

Circular From NORTH

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Ports Declare Ban on EGCS Discharges

Exhaust gas cleaning systems (EGCS) – more commonly referred to as scrubbers – are an accepted equivalent measure in complying with the IMO 2020 global sulphur cap. The use of scrubbers has split the shipping industry. Ports around the world are looking at the impact of scrubber use in their waters.

A number of ports and regions have already stated that they will not allow the discharge of washwater from scrubbers.

The table below summarises North's understanding of the positions taken by ports that have or will prohibit the use of scrubbers, or have placed conditions on their use.

This information is to the best of our knowledge and is for guidance only. For up to date and definitive information, contact the local authorities or agents.

Country	Port	Open loop EGCS discharge allowed?	Comments
Australia	All	Yes	According to AMSA Marine Notice 05/2019 , wash water testing should be conducted upon commissioning of the EGCS and repeated every twelve months, as a minimum, for a period of two years. Ships may be directed not to discharge wash-water from an EGCS in Australian waters if this data, or evidence that samples have been taken for analysis, cannot be provided to AMSA before arrival at the first Australian port.
Bahrain	Bahrain	No	Open loop operation not allowed in port or at anchor Open loop operation is allowed in Bahraini territorial waters and exclusive economic zone (EEZ) as long as it can be proved that the discharge of washwater complies with MEPC.259(68) and there is no negative impact on marine ecosystems.

Belgium	All	No	Belgian federal law states discharge only allowed in coastal and open seawaters when at least 3nm off coast Discharges must not imperil EU Water Framework Directive objectives. Flemish regional law also confirms discharge not allowed in ports or inland waters.
PR China	Inland river Emission Control Areas (ECAs), Port areas within coastal ECAs and Bohai Sea – the sea area within lines connecting the junction point of shorelines of Dandong, Dalian and shorelines of Yantai, Weihai.	No	China MSA guidance prohibits the discharge of water washings from open- loop scrubbers in certain areas. The prohibited areas are: Inland river Emission Control Areas (ECAs) Port areas within coastal ECAs Bohai Sea – the sea area within lines connecting the junction point of shorelines of Dandong, Dalian and shorelines of Yantai, Weihai. The guidelines also prohibit the incineration of the water washing residues from any type of exhaust gas scrubber. Ships are required to keep accurate records of the stowage and disposal of the washing washings. If a vessel is not able to store the washing water it is required to switch to low sulphur fuel (not exceeding 0.5%) prior to entering the above areas. The guidelines also state that under certain circumstances a vessel may apply for an exemption if it uses fuel that does not meet the MSA’s requirements. A copy of the MSA’s guidelines for ships operating within the ECAs, including enforcement details can be found here.
Egypt 埃及	Suez Canal 苏伊士运河	No 不允许	Suez Canal Authority has issued Circular 08/2019. Clarification provided here. The authority puts no conditions or restrictions on marine fuels until Egypt ratifies MARPOL Annex VI – as such, sulphur cap is not in

force.

Wash water from open-loop scrubbers is not permitted to be discharged during transit of the canal.

Germany	Inland Waterways , canals and ports within inland waterways	No	See the Convention on the Collection, Deposit and Reception of Waste Produced during Navigation on the Rhine and Inland Waterways (CDNI) https://www.cdni-iwt.org/de/faq/divers/
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Gibraltar	Gibraltar	No	Closed loop scrubbers are permitted in Gibraltar waters, Hybrid scrubbers operating in closed loop mode are also permitted, and open loop scrubber are temporarily not permitted as a precautionary measure until the Gibraltar Government arrives at a definitive policy decision with regards to (solely) open loop scrubbers
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Ireland	Dublin and Waterford	No	Refer to Port of Dublin's NOTICE TO MARINERS No. 37 of 2018 Prohibition on the Discharge of Exhaust Gas Scrubber Wash Water http://www.dublinport.ie/wp-content/uploads/2018/06/37-2018-Prohibition-on-the-Discharge-of-Exhaust-Gas-Scrubber-Wash-Water.pdf Port of Waterford weblink http://www.portofwaterford.com/news/marine-notice-prohibition-on-the-discharge-of-exhaust-gas-scrubber-wash-water
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Latvia	All Ports	Conflicting advice	EUROPEAN COMMISSION REPORT (2016): Allowed – no restrictions, but national authorities are of the position that open-loop scrubber discharge should be prohibited in territorial waters and ports ABS Report (2018): Prohibited in port waters Correspondents Pandi Balt Ltd advised in August 2018 that washwater discharges currently allowed under regulations but likely to be prohibited in future.
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Lithuania	All Ports	Conflicting advice	EUROPEAN COMMISSION REPORT (2016): Allowed – no restrictions (in accordance with IMO Washwater Guidelines MEPC 184(59)).
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ABS Report (2018): Prohibited in territorial waters and ports

We understand Lithuanian authorities are studying whether EGCS wash water discharges have serious impacts on the marine environment or not. When results will be clear, conclusions will be provided.

Malaysia	All Ports	No	Vessels fitted with scrubbers that call at Malaysian ports must change over to compliant fuel or operate in closed-loop mode before entering Malaysian waters (12 nautical miles from land).
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Pakistan	Port of Karachi and Port Bin Qasim	No	Pakistan's Ministry of Maritime Affairs circular 001/2020 prohibits use of open loop scrubbers and therefore compliant fuel must be used Hybrid scrubbers must be operated in closed-loop mode
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Panama	Panama canal	No	NT NOTICE TO SHIPPING No. N-1-2019 "Vessel Requirements", Section 31 b. (7) states:
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*"Vessels are not required to changeover to light fuel on their propulsion engines if equipped with a type approved **closed-loop exhaust gas cleaning system (scrubbers)** kept in operation, during the entire transit. The date and time of the period of operation of this equipment shall be recorded in the engine room logbook."*

Additionally, Section 28 (5) of the same document states: *"Residues from the Exhaust Gas Cleaning System (EGCS) washwater are to be collected on board. Discharging these residues into the water bodies under the responsibility of the Panama Canal or incinerating them on board is not permitted."*

The Notice can be read [here](#).

Portugal	All Ports	No	Use of open loop scrubbers are not allowed from entry of the ship into
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the port, along the port channel and at berth (moored), until the ship leaves the port. Only closed loop operation is allowed.

Singapore	Singapore	No	Ban on the use of open loop scrubbers expected to take effect on 1 January 2020
Spain	Algeciras, Cartagena, Huelva	No	Use of open loop scrubbers is prohibited at the Spanish ports of Algeciras, Cartagena and Huelva. At present no other Spanish ports have imposed this ban.
United States	Californian Ports and Waters	No	The Californian ARB OGV regulations stipulate only distillate fuels can be used to comply with the 0.1% sulphur limit Changeover to compliant distillate fuel (MGO or MDO) prior to entering Californian waters
United States	Connecticut Ports and Waters	No	Discharge of exhaust gas scrubber washwater into Connecticut waters from any vessel is prohibited VGP 2013: 6.5.9 Discharge of exhaust gas scrubber washwater into Connecticut waters from any vessel covered under the VGP or sVGP is prohibited. This condition is necessary for compliance with CGS section 22a-427, Standards No.1, 2, 9, 12, 14, 15, and 24 of the CT WQS.
United States	Hawaii Ports and Waters	Yes – conditional	Additional requirements under VGP 2013 Section 6.6. The State of Hawaii (Clean Water Branch) issued ‘Blanket Section 401’ Water Quality Criteria (WQC). This covers 27 categories of effluent discharge from an applicable vessel (EGCS washwater being one) that have received the best control or treatment into waters of the State of Hawaii incidental to the normal operation of the applicable vessels
United Arab	Abu Dhabi Ports	Yes – conditional	Abu Dhabi Ports Company Policy:

Emirates

Sludge generated from exhaust gas scrubber washwater discharge must not be discharged into port waters.

Exhaust gas scrubber washwater discharge may only be discharged in port waters if free from pollutants.

Any exhaust gas scrubber sludge should be discharged from a vessel to an ADPC licensed waste disposal contractor

http://www.adports.ae/wp-content/uploads/2017/01/20131003_Vessel-Discharge-Draft-C.pdf

United Arab Emirates

Fujairah

No

[Notice to Mariners No. 252](#) from Port Fujairah prohibits use of open loop scrubbers in its waters

Source of Information: The North P&I Club