

Don't panic on ECAs

Shipowners must act decisively, but not panic, should their fuel test results show levels of sulphur marginally exceeding the 1.50% limit imposed within the MARPOL Annex VI Emission Control Areas (ECAs) – previously known as Sulphur Emission Control Areas (SECAs).

Since the enforcement of ECAs, Lintec Testing Services Ltd has found many examples of bunker fuel samples which exceeded the 1.50% sulphur limit, but fell within the accepted 95% confidence limit for a single test.

A bunker fuel exceeding the 1.50% sulphur limit is not a technical problem as it will not affect the operation of the vessel.

However, it is a legislative problem, and the vessel must act to protect itself in the eyes of the law.

As a result, Lintec Testing Services Ltd has developed straightforward guidelines to clarify matters for clients, so that the shipowner and charterer can take the necessary steps when dealing with this grey area.

In cases when the commercial sulphur result of the sample tested by Lintec is confirmed to exceed the 1.50% limit, Lintec recommends that the fuel supplier is notified of the result.

The shipowner, or charterer, should ask the supplier to confirm, in writing, that the fuel supplied to the vessel meets the requirements of the MARPOL Annex VI ECA limit.

Should the supplier state that the fuel does meet this regulation, the reply must be stored with the MARPOL sample and all evidence recorded in the Annex VI logbook.

However, in cases where the supplier fails to act on the request from the vessel, or where the supplier confirms that the fuel was in fact in excess of the ECA limit, Lintec recommends that vessel immediately notifies the flag state administration and the port state authority should also be advised.

If port state authority removes the MARPOL Annex VI sample for testing and finds the fuel to be in excess of 1.50% sulphur, the vessel should be able to provide written evidence from the supplier, clearly stating that the fuel supplied met the ECA regulations.

By following Lintec's recommendations the vessel will be able to present a record of the actions taken to purchase and use fuel compliant to the current ECA limits.

It must be noted that as a consequence of the latest revision of MARPOL Annex VI, the sulphur content of fuel oil for use on board ships in ECAs shall not exceed 1.00% on and after 1 July 2010.

