

# Preparing for Port State

## Quick guidance for vessels on proving compliance

The reduction of the MARPOL Annex VI global fuel sulphur cap to 0.50% will come into force on 1 January 2020, followed by a prohibition on the carriage for use of non-compliant fuel from 1 March 2020 (unless fitted with equivalent measures such as an exhaust gas cleaning system).

The sulphur cap regulation is set by the IMO, but enforcement is the responsibility of the individual states and this may vary. We look at what to expect from port State control (PSC).



### WHY AM I BEING INSPECTED?

PSC target vessels based on their risk. Typical risk factors include vessel's historic PSC performance, its age, flag, classification society and ISM manager performance. PSC might also target a vessel if they are alerted by a third party (such as a pilot) or by 'sniffing' devices that detect stack emissions.

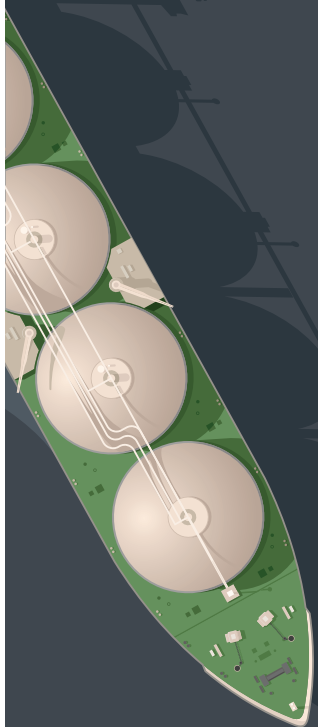
### THE INSPECTION PROCESS

The IMO have issued guidelines to PSC. However, the process will depend on whether the vessel has an exhaust gas cleaning system (EGCS) installed, and it could vary from state to state.

#### Initial Inspection

The first stage of the inspection is likely to be a review of the vessel's documentation that relate to fuel sulphur compliance:

- Ship's certificates relating to MARPOL Annex VI (e.g. IAPPC + supplement, EIAPPC).....
- Bunker delivery notes (BDN) retained as required .....
- Bunker operation checklists .....
- Oil Record Book(s) – Part 1 .....
- Bunker certificates of quality .....
- Ship implementation plan .....
- If using different fuels for compliance (e.g. 0.50%S max and 0.10%S max):**
- Written fuel changeover procedures in a working language.....
- Records of fuel changeovers when entering and exiting emission control areas (ECAs).....
- If non-compliant fuel is on board or the fuel is suspected to be non-compliant:**
- Any notification to the flag State, destination port State and the authorities of the country of where bunkers were delivered .....
- Any letters of protest issued by the vessel and other commercial documentation relevant to non-compliant bunker delivery .....
- Any FONAR submissions with supporting evidence.....
- If vessel is fitted with exhaust gas cleaning systems (EGCS):**
- Certificates to show EGCS is an approved "equivalent means" of compliance .....
- BDN of high sulphur bunkers indicates that it is to be used on unit with EGCS .....
- Evidence that the EGCS is operational and is being used .....
- Any notifications to flag State and destination port State of EGCS malfunctions .....
- If there has been any malfunction to the monitoring instrumentation, provide alternative documentation to prove compliant operation .....



## 2020 Shorts: Simple suggestions on complying with the IMO 2020 Sulphur Cap

# Preparing for Port State (cont).

### More Detailed Inspection

If the initial inspection gives clear grounds for port State to believe that the condition of the vessel and its equipment do not correspond with the documentation or the crew are not familiar in the relevant operations, this may escalate to a more detailed inspection.

### Fuel Sampling

If the vessel is not fitted with EGCS, or the use is prohibited in port, then PSC are likely to check that its fuel is compliant. This may require testing of:

- the MARPOL delivered sample (drawn at time of bunkering and retained by the vessel)
- the not-in-use onboard sample (drawn from the vessel's bunker storage tanks during inspection)
- The in-use sample (drawn as close as possible to the engine inlet during inspection)

If requested by PSC to draw samples of the fuel in use, consider the following:

- Does the proposed sampling point allow for a sample to be drawn safely?
- Does the proposed sampling point allow for a representative sample to be taken?
- Does the chief engineer and PSCO agree on the sampling point?
- Are samples drawn into clean suitable bottles and sealed with identification tags?

### Documentation

The ship's records are likely to come under greater scrutiny. This includes:

- Do the fuel consumption logs accurately reflect the current remains on board and record the fuel used when in and outside ECA?
- Is there enough compliant fuel on board to reach the next destination?
- Are the crew familiar with the onboard operational procedures and record-keeping requirements relating to bunkers?

### If vessel is fitted with exhaust gas cleaning systems (EGCS):

- Has the EGCS and its monitoring systems been installed and operated in accordance with the manufacturer's instruction?
- Are the monitoring systems fully operational, tamper-proof and allow continuous monitoring?
- Can the vessel evidence compliance with the parameters listed in the system documentation?
- Are the crew familiar with correct operation of the EGCS and the record-keeping requirements?

**TOP TIP: Reduce the risk of a detailed PSC inspection by properly preparing for the initial inspection!**

## USEFUL LINKS

North's 2020 Vision expertise area <http://bit.ly/2sIYTg9>

RESOLUTION MEPC.321(74) - 2019 GUIDELINES FOR PORT STATE CONTROL UNDER MARPOL ANNEX VI CHAPTER 3  
<http://bit.ly/2sDlols>

MEPC 74/18/Add.1 - ANNEX 13 DRAFT AMENDMENTS TO MARPOL ANNEX VI  
<http://bit.ly/2Rksx5z>

RESOLUTION MEPC.259(68) - 2015 GUIDELINES FOR EXHAUST GAS CLEANING SYSTEMS  
<http://bit.ly/33UVQ1y>

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