

09 August 2004

Subject: MARPOL Annex VI on Air Pollution Prevention

Technical Manager/Superintendent,

This letter is to inform you of new regulations which may apply to one or more of the ships you own or operate which is classed with ABS. In light of the recent ratification of MARPOL Annex VI on Air Pollution Prevention, MARPOL Annex VI is scheduled to enter into force on 19 May 2005.

Ships of 400 gt and above and floating drilling platforms built on or after 19 May 2005, flying the flag of a signatory Party to Annex VI and intending to engage on international voyages will, on delivery, need to obtain an International Air Pollution Prevention Certificate. Similarly, existing ships built before 19 May 2005 will need to be certificated no later than the first scheduled drydocking after 19 May 2005, but in all cases by 19 May 2008.

As of July 2004, the Parties to Annex VI consist of Bahamas, Bangladesh, Barbados, Denmark, Germany, Greece, Liberia, Marshal Islands, Norway, Panama, Samoa, Singapore, Spain, Sweden, and Vanuatu. An up-to-date listing is maintained at www.imo.org. However, it should be noted that on or after 19 May 2005 signatory States can require foreign flag ships operating in their jurisdictional waters and their flag ships to comply with the applicable provisions of MARPOL Annex VI. Prerequisites for certification include two significant retroactive aspects:

- Diesel engines (except emergency diesel engines, engines installed in lifeboats and any device or equipment intended to be used solely in case of emergency) with a power output of more than 130kW installed on ships, irrespective of GT, built on or after 1 January 2000 must be certified by, or on behalf of, the ship's Flag State to the requirements contained in the mandatory NO_x Technical Code. Engines which, after that date, are replacement 'new' engines, substantially modified, or have had their maximum continuous rating increased by 10% or more are also subject to the NO_x certification requirements, irrespective of the date of build of the ship onto which those engines are installed. In the case of platforms and drilling rigs those diesel engines used solely in connection with the exploration, exploitation or processing functions are exempt from these NO_x controls.
- Incinerators installed on board ships after 1 January 2000 must be type-approved based on the guidelines contained in Resolution MEPC.76(40). The Guidelines address electrical and mechanical safe guards, fire protection provisions, emission limits and operational controls. Furthermore, in all cases from the entry into force date, there will be controls on the types of material which can be incinerated together with operator training requirements.

There are potential fuel oil segregation requirements for ships burning residual blend fuel oils and which operate within the SO_x Emission Control Areas (SECA) introduced by Annex VI, to date - the Baltic from 19 May 2006 and the North Sea probably from late 2007. In these areas there will need to be:

- a sufficiently segregated fuel oil storage, settling and service tank capacity, together with the necessary change over arrangements, to handle both the fuel oils used outside of SECAs and the 1.5% m/m sulphur maximum fuel oils to be used at all times when within the SECAs. In some cases, duplicate engine lubricant storage may also be necessary to cope with the differing requirements of the two fuel grades. For ships where such arrangements are not possible, conversion work will be necessary.

As alternatives to the 1.5% m/m maximum sulphur fuel oil, the Annex provides for control by means of either exhaust gas cleaning systems or other equivalent means. However, the Guidelines covering these options have yet to be developed by IMO these are not currently available options.

Additionally, from 19 May 2005 all fuel oils are to be obtained from duly registered suppliers (registered by the appropriate authorities in the country in which they operate). Bunker delivery notes, of a specified content, are to be maintained onboard ships of 400 gt, and above, and floating drilling rigs and platforms engaged in international voyages, for a minimum period of 3 years from the date of bunker delivery. A retained sample, drawn by the supplier at the ships receiving manifold in accordance with the Resolution MEPC.96(47), of all supplied fuel oils is to be kept under the ship's control until the corresponding fuel oil has been substantially consumed, but in any case, for at least 12 months from the date of delivery. In this respect 'fuel oils' is to be understood as covering all grades from light gas oils through to heavy residual blend products.

After 19 May 2005, installation of equipment containing ozone depleting substances (ODS) will not be permitted, existing equipment may however be re-charged as necessary. In service, there must be no deliberate emissions of ODS and when those gases are to be disposed, it must be to appropriate reception facilities provided at ship repair or ship breaking yards.

As a further point, it must be noted that Annex VI introduces a number of operational factors which will need to be reflected in the ship's safety management system.

With regard to other marine air pollution controls your attention is drawn to the action being taken by the European Union which may change the existing 0.2% m/m maximum sulphur gas oil limit and instead, amongst other provisions, would unilaterally apply the SECA requirements irrespective of flag or coastal State ratification status.

Very truly yours,



Lenny Pendexter,
Vice President / Chief Surveyor
American Bureau of Shipping

cc: Assistant Chief Surveyors
Vice Presidents Engineering