



DECEMBER 22, 2011

CIRCULAR NO. 39/11

TO MEMBERS OF THE ASSOCIATION

Dear Member:

TURKEY - NEW FUEL OIL SULPHUR CONTENT REGULATIONS

Members whose vessels trade in Turkish waters should be aware that, effective January 1, 2012, new regulations concerning limits on the sulphur content of fuel oil used by vessels in Turkish waters and on board Turkish-flagged vessels will enter into force. A copy of the relevant circular issued by the Turkish General Directorate of Marine Transport is appended hereto.

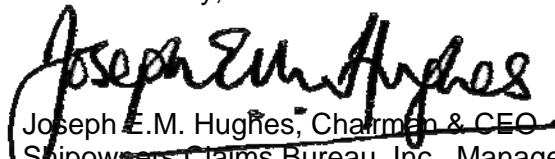
The circular suggests that the forthcoming requirements will be as follows:

- All vessels either alongside in Turkish ports or sailing within inland waterways shall use fuel oil containing not more than 0.1% sulphur by mass.
- All passenger vessels engaged on regular routes shall, while within Turkish territorial waters, use fuel oil containing not more than 1.5% sulphur by mass.
- Turkish-flagged vessels, when sailing within an Emission Control Area (ECA), shall use fuel oil containing not more than 1.5% sulphur by mass. However, notwithstanding this regulation, Members will be aware that the overriding priority is compliance with MARPOL Annex VI which currently requires all vessels sailing within an ECA to use fuel oil containing not more than 1.0% sulphur by mass, regardless of flag.

Members who may be affected by the above are advised to ensure that their vessels comply with the new Turkish regulatory requirements by January 1, 2012.

Should Members have any questions your Managers will be pleased to assist.

Yours faithfully,


Joseph E.M. Hughes, Chairman & CEO
Shipowners Claims Bureau, Inc., Managers for
THE AMERICAN CLUB

ISTANBUL & MARMARA, AEGEAN, MEDITERRANEAN, BLACKSEA REGIONS
CHAMBER OF SHIPPING

Istanbul :

Our Reference : 3528

21.09.2011

Subject : **About Quality of Fuel**

Circular No: 517 / 2011

Reference: 07.09.2011 dated and 25963 numbered letter of Prime Ministry, Undersecretariat of Maritime Affairs, General Directorate of Marine Transport.

It is enclosed herewith the Reference letter containing that vessels coming to ports of our country can not use marine diesel whose Sulphur content exceeds 0.1 % by mass as of 01.01.2012 and also, vessels with Turkish Flag shall not use marine fuels whose sulphur content exceeds 1,5% in SOx Emission Detection Fields determined by IMO in accordance with Marpol Annex-VI,

Likewise, Passenger Vessels sailing in our country's marine jurisdictions can not use marine fuels whose Sulphur content exceeds 1.5 % by mass.

Respectfully submitted,

Yours Faithfully,

Signature
Murat TUNCER
General Secretary

ANNEXES:

ANNEX-1: Reference letter (2 pages)

DISTRIBUTION:

Due:

- To All Members (in Web page)
- Turkish Shipowners Association
- S/S Ship Owners Motor Carriers Coop.
- Maritime Association of Shipowners and Agents
- IMEAK DTO 14 and 30 Numbered Prof. Com. Chair.
- Association of Ship Fuel Suppliers
- S/S Sea Tankers Fuel Oil Transport Coop.

Information:

- Y/K Chairman and Members
- IMEAK DTO Environment Commission

REPUBLIC OF TURKEY, PRIME MINISTRY, UNDERSECRETARIAT OF MARITIME AFFAIRS
General Directorate of Marine Transport

Number : B.02.01.DNM/0.06.14.01.143.01/25963

07/09/2011

Subject : Quality of Fuel

TO ISTANBUL & MARMARA, AEGEAN, MEDITERRANEAN, BLACKSEA REGIONS
CHAMBER OF SHIPPING
(Meclis Mebusan Cad. No: 22 Fındıklı / ISTANBUL)

Reference: a) 04.08.2011 dated and 1116 numbered your letter,
b) 21.06.2011 dated and 2480 numbered letter of İMEAK Chamber of Shipping addressed to your Ministry,
c) "Regulation on Reduction of Sulphur Rate in Some Types of Fuel Oils", which has entered into force by being published in 6 October 2009 dated and 27368 numbered Official Gazette,
d) "Regulation about Making Amendment in the Regulation on Reduction of Sulphur Rate in Some Types of Fuel Oils", which has entered into force by being published in 31 December 2009 dated and 27449 numbered Official Gazette,

It is stated that it is requested to continue using the normal marine fuels in the reference (b) letter by İMEAK (Istanbul & Marmara, Aegean, Mediterranean, Blacksea Regions) Chamber of Shipping on account of the fact that any emission detection field has not been declared in our country yet by stating with your reference (a) letter that vessels coming to ports of our country as of 2012 can not use marine diesel whose sulphur content exceeds 0,1 % under the scope of "Regulation on Reduction of Sulphur Rate in Some Types of Fuel Oils", which has entered into force with 29.09.2005 dated and 2009/15478 numbered Council of Ministers' Decision; it can not be understood how to make the application for the fossil fuels. In the continuation of letter, it is requested to assess the reference (b) letter sent in the attachment of letter with reference to the works conducted by our Undersecretariat in connection with marine fuels and to inform its result to your Ministry.

As it is known, reference (c) regulation, enacted in coordination with your Ministry for harmonization with European Union Directives before "Environment Section" negotiated within the scope of harmonization works conducted in European Union membership process, has replaced with reference (d) regulation.

When reference (b) letter is inspected, it is understood that reference (c) and (d) regulations are interpreted as "vessels coming to ports of our country can not use marine diesel whose sulphur content exceeds 0.1% by mass as of 01.01.2012". Before aforementioned regulation is enacted and subsequently, meetings have been organized by the sector representatives regarding the subject with the participation of Energy Market Regulatory Board (EPDK), Association of Ship Fuel Suppliers and Chamber of Shipping and such developments have been mentioned in the aforementioned meetings.

In this respect, marine fuels have been determined by the regulations enacted by EPDK and while fuels which are commonly defined as gas oil or diesel in the marine language, are called as Group I marine diesel and Group II marine diesel in the relevant regulations, fuels which are commonly defined as fuel oil in the marine language, are called as marine fuel in the relevant regulations. These fuels are produced and supplied to the market according to TR ISO 8217 standard in our country.

REPUBLIC OF TURKEY, PRIME MINISTRY, UNDERSECRETARIAT OF MARITIME AFFAIRS
General Directorate of Marine Transport

Number : B.02.01.DNM/0.06.14.01.143.01

.../.../2011

Subject : Quality of Fuel

It is resolved in 7th article of reference (c) regulation amended with reference (d) that marine fuels whose sulphur content exceeds 0,1 % by mass can not be used as of 01.01.2012 in the inland vessels and in the vessels on the quay. It has been resolved according to the communiqué enacted by EPDK and published in 11 October 2009 dated and 27373 numbered Official Gazette (Bunker Fuel Serial No: 3) that from among marine fuels supplied to the market or circulating as of 31.12.2011, Group I marine diesel can contain maximum 0,1 % sulphur and Group II marine diesel can contain maximum 1,5 % sulphur and this situation is supportive to the provision of aforementioned regulation.

Although it is also stated according to 5th article of reference (c) regulation amended with reference (d) that marine fuels, whose sulphur content exceeds 1,5 %, is not used in SOx Emission Detection Fields in our country's marine jurisdictions, there is not any SOx Emission Detection Field determined in our country yet. However, it has been also resolved in this article that vessels with Turkish flag can not use marine fuels whose sulphur content exceeds 1,5% in accordance with MARPOL Annex 6 in SOx Emission Detection Fields defined by International Maritime Organization. Additionally, it has been also resolved in this article that all passenger vessels providing regular service should use marine fuels whose sulphur content does not exceed 1,5 % while they are sailing in our country's marine jurisdiction.

Consequently, marine fuels have been regulated with the aforementioned regulations and there is not any additional regulation made by our Undersecretariat.

I kindly request you to be informed and to take necessary actions.

Signature

Dr. Ozkan POYRAZ
On behalf of Undersecretary
General Manager

DISTRIBUTION

Due:

To Ministry of Environment and Urban Planning
(General Directorate of Environment Management)

Information:

IMEAK Chamber of Shipping