

MEMBER ALERT



Shipowners Claims Bureau, Inc., Manager
One Battery Park Plaza 31st Fl., New York, NY 10004 USA
Tel: +1 212 847 4500
Fax: +1 212 847 4599

<https://www.american-club.com>

OCTOBER 30, 2019

SULFUR CAP 2020 UPDATE

In view of the fast approaching IMO 2020 legislation, Members are reminded of some important issues to consider and ensure to have in place prior to January 1, 2020 including preparations for port State control (PSC) inspections.

- Bunker contracts and agreements with suppliers to be in place well before 2020;
- Legal review of charter party bunker clauses should be completed;
- A documented ship-specific IMO recommended implementation plan as set forth in *MEPC.1/Circ.878, Guidance on the Development of a Ship Implementation Plan for the Consistent Implementation of the 0,50% Sulphur Limit Under MARPOL Annex VI*;
- A Fuel Oil Management Plan to be in place covering:
 - Bunkering procedures including a Bunkering Operation Logbook to be available;
 - Sampling procedures, methods, locations, sealing, labeling and instructions for handling and retention;
 - Note of Protest forms for delivery issues should be made available;
 - Chief Engineers should be familiar with post-2020 Bunker Delivery Notes (BDNs) and required content;
 - Fuel change-over policies for entering and leaving ECA's to be fully documented and understood by the officers and crew and Fuel Change-Over Registration Logbook to be available; and
 - Non-Availability of Compliant Fuels report forms should be available for Emission Control Areas (ECAs).
- Engine builder's recommendations for consumption of LSFO to be followed and all engine manuals and all operating instructions updated, including instructions on the possible use of additives in fuels – both HFO and ULSGO to combat potential issues with:
 - viscosity;
 - acidity;
 - low flashpoints;

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- ignition & combustion quality;
- increased levels of catalytic fines; and
- lubricating oil supplier's recommendations to be ready for implementation.
- Fuel tanks, sludge tanks, drain tanks, bunkering system etc., are emptied and cleaned (as necessary) of all high sulfur fuels and sludge;
- Contingency plans to be in place (carriage of LSGO or LSFO in designated tanks) in case of scrubber plant malfunction; and
- Sample points to be fitted to allow sampling when request by PSC. All sample points to be adequate for location, system pressures and temperatures and classification society approved.

Members are reminded that bunker related guidance can be found on the Club's website at:

<https://www.american-club.com/page/bunker-fuels>

Your Managers recommend that Members take note of this information and be guided accordingly.