



İstanbul :

Sayı

Our Reference : 3595

Konu

Subject : "ICS'in MSC'nin 100'üncü Dönem Toplantısına Ait Önerisi Hk."

20.09.2018

Sirküler No: 539 / 2018

Sayın Üyemiz,

**İlgi:** Uluslararası Deniz Ticaret Odası(ICS)'nin 14.09.2018 tarihli ve MC(18)80 sayılı yazısı ve Eki

ICS Üyeleri, "IMO Sözleşmeleri'nde, yakıt kalitesi ve güvenliğinin mevcut hükümlerinin etkili uygulanmasına ilişkin, ICS'ın MSC 100'e önerisi" hakkındaki sirkülerini değerlendirilmesi için 25 Eylül 2018 tarihine kadar ICS'in sekreteryasına görüş bildirmeleri ve/veya destek vermeleri, ilgi yazı ile talep edilmektedir.

İlgi yazı Sirkülerin Odamızda yapılan Türkçe çevirisi (Ek-1) ile "Yakıt Kalitesi ve Güvenliği İçin Mevcut Hükümlerin Etkin Bir Şekilde Uygulanması" hakkında hazırlanan Bilgi Notu (Ek-2) ilişikte sunulmaktadır.

Konu ile ilgili varsa görüş ve önerilerinizin [erkin.tugran@denizticaretodasi.org.tr](mailto:erkin.tugran@denizticaretodasi.org.tr) adresine 24 Eylül 2018 tarihi mesai saati bitimine kadar gönderilmesini, bilgilerinize arz ve rica ederiz.

Saygılarımızla,

Murat TUNCER  
Genel Sekreter

**EKLER:**

Ek-1: İlgi yazı sirkülerinin Türkçe çevirisi (2 syf.)

Ek-2: İlgi yazı ve Eki (7 syf.)

**DAĞITIM:****Gereği:**

- Tüm Üyelerimiz (Web)
- Türk Armatörler Birliği
- S/S Gemi Armatörleri Motorlu Taş. Koop.
- Vapur Donatanları ve Acenteleri Derneği
- İMEAK DTO Meslek Komitesi Başkanları
- İMEAK DTO Şube ve Temsilcilikleri
- GİSBİR
- GESAD
- Yalova Altınova Tersane Girişimcileri San. ve Tic.A.Ş
- TÜRKLİM
- Gemi Sahibi Firmalar

**Bilgi:**

- Ulaştırma, Altyapı Bakanlığı  
Deniz ve İçsular Düzenleme Genel Müdürlüğü
- Ulaştırma ve Altyapı Bakanlığı  
Deniz Ticareti Genel Müdürlüğü
- Çevre ve Şehircilik Bakanlığı  
Çevre Yönetimi Genel Müdürlüğü
- Meclis Başkanlık Divanı
- Yönetim Kurulu Başkanı ve Üyeleri
- İMEAK DTO Şube Y.K. Başkanları
- Türk Loydu Uygunluk Değerlendirme Hiz. A.Ş.
- Gemi Makineleri İşletme Mühendisleri Odası
- Gemi Mühendisleri Odası
- WISTA Türkiye Derneği

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EK-1

(Serbest Çeviridir)

14 Eylül 2018

MC(18)80

DENİZCİLİK KOMİTESİ

Kopya: GEMİ İNŞAA VE EKİPMAN ALT KOMİTESİ  
ÇEVRE ALT KOMİTESİ  
TÜM ÜYELER (Bilgi için)

## IMO SÖZLEŞMELERİNDE, YAKIT KALİTESİ VE GÜVENLİĞİNDE MEVCUT HÜKÜMLERİN ETKİLİ UYGULANMASINA İLİŞKİN, ICS’İN MSC 100’E ÖNERİSİ

**Yapılması Gerekenler:** Üyeler, Sekretarya tarafından hazırlanan ve Ek'te bulunan yakıt kalitesi ve güvenliği konusundaki MSC 100’üncü Dönem Toplantısına hazırlanan taslak görüşü, değerlendirmeye davet edilmektedir. MSC 100'e, 25 Eylül 2018 tarihine kadar doküman sunulması için üyelere sekreteryaya görüş bildirmeleri ve/veya destek vermeleri talep edilmektedir.

Sekretaryanın “IMO Sözleşmelerinde yakıt kalitesi ve güvenliği için mevcut hükümlerin etkin bir şekilde uygulanması” başlıklı bir taslak görüşü MSC 100'e hazırladığı, üyelere bildirilmektedir. Taslak öneri, üyelerin yakıt kalitesi ve güvenliği ile ilgili endişelerine istinaden geliştirilmiştir.

“2020 Yılında Uygun Yakıtlara İlişkin Güvenlik Uygulamaları ve İlgili Zorluklar” başlıklı MEPC bildirisine ICS’in destek vermesi gerekip gerekmediğinin üyeler tarafından değerlendirilmesini isteyen MC (18) 63 ve MC (18) 68 yayımları, üyeler tarafından bilinecektir. Üyeler arasında bu dokümanın ortak sponsorluğunu destekleyecek herhangi bir fikir birliği olmamasına rağmen, üyeler belgede vurgulanan yakıt kalitesi ve güvenliği ile ilgili endişeleri paylaşmaktadır. Alınan geri bildirimlere dayanarak, Sekretarya, üyelerin dile getirdiği bazı kaygıların ele alınması kaydıyla, MSC 100'e yakıt güvenliği ve kalitesi konusunda bir dokümanın sunulmasını destekleyecek bir mutabakat sağlanacağını değerlendirmektedir.

Yakıt, MARPOL EK-VI Kural 14 hükümlerini karşılayacak olup, ayrıca MARPOL EK-VI Kural 18 ve SOLAS II-2 hükümlerinin gerektirdiği şekilde de kaliteye sahip olması ve güvenli kullanılması gerekmektedir. Üyeler 1 Ocak 2020 tarihi ve sonrasında tüm gemi sahipleri için eşit şartların sağlanmasından ve aynı zamanda, kalitesiz yakıtların, gemi adamlarını ve gemileri tehlikeye atmayacağından emin olmakla ilgilenmektedir.

Bu nedenle Sekretarya, Ek'te bulunan “IMO Sözleşmelerinde Yakıt Kalitesi ve Güvenliği için Mevcut Hükümlerin Etkin Bir Şekilde Uygulanması” başlıklı bir taslak öneriyi MSC 100'e hazırlamıştır.

Bu doküman yalnızca güvenlikle ilgilidir ve yakıt kalitesi ve güvenliği hususunda kaygılarını belirtmekte olup, 1 Ocak 2020 tarihinde yürürlüğe girecek olan MARPOL EK-VI Kural 14'teki değişikliklerin sadece basit bir işlevi değildir. Ayrıntılı bilgi: Erkin TUĞRAN, Dış İlişkiler Birimi Telefon:252 0130-246 E-mail: erkin.tugran@denizticaretodasi.org.tr



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Sirküler No: 539 / 2018

Ancak, mevcut kaygıların, endüstrinin 2020'ye hazır olunurken %0.5 kükürtlü yakıtta geçişini gerçekleştirmesiyle daha da belirgin hale geldiği kabul edilmektedir.

MARPOL EK-VI ve/veya SOLAS'a taraf olan IMO üyesi ülkelerin, MARPOL EK-VI Kural 18 ve SOLAS II-2 hükümleri uyarınca yakıt kalitesinin ve güvenliğinin düzenlenmesi konusunda zaten yükümlülüklerinin olduğu, taslak öneri tarafından ileri sürülmektedir.

Emniyet açısından kritik olan bu konunun düzenlenmesinin iki ayrı sözleşmeye ayrıldığı halihazırdaki durum, bu sözleşmelerden birinin MSC'ye tabi olmasından ve diğerinin de MEPC'nin yönetimine tabi olmasından dolayı daha sorunlu hale getirilmiştir. Bu düzenleme, MEPC'nin hem çevre uygunluğu hem de yakıtla ilgili güvenlik konularını etkileyen kararlardan sorumlu olmasından dolayı potansiyel anlaşmazlık ile sonuçlanmıştır.

Taslak öneri, bir dizi görüş sunmaktadır ve MSC'nin değerlendirilmesi için üç ana görüş içermektedir:

- MARPOL EK-VI Kural 18'in güvenlik hükümleri, SOLAS içerisine dahil edilmelidir;
- Üye devletlerin, yakıt tedarik zincirinde daha yüksek standartları teşvik etmek amacıyla bunker tedarikçisi lisanslama programlarını tanıtmaları için teşvik edilmesi; ve
- IMO Küresel Entegre Deniz Taşımacılığı Bilgi Sistemi (GSIS - The IMO Global Integrated Shipping Information System), yakıt kalitesi ve güvenlik verilerinin daha büyük ayrıntılara sahip olmasını sağlamak için geliştirilmelidir.

Taslak öneri, çevresel konular hakkında yorum yapmamakta olup, bu konuların güvenlikle ilgili olanlardan ayrı olarak MEPC'nin yönetimine tabi olduğu kabul edilmektedir. Uygulandığı takdirde tekliflerin, mevcut gerekliliklerinin daha etkin bir şekilde uygulanmasını kolaylaştırdığı ve güvenlikle ilgili konuları, çevre koruma ile ilgili olanlardan ayırarak ve daha iyi bilgi yönetimi sağlayarak, gemi adamları ve gemiler için daha fazla güvenlik sağlamayı teşvik edeceği düşünülmektedir.

**Ekler:**

Ek – "IMO Sözleşmelerinde Yakıt Kalitesi ve Güvenliği İçin Mevcut Hükümlerin Etkin Şekilde Uygulanması"

*İngilizceden Çeviren: Erkin TUĞRAN*

*İMEAK DTO Çevre Sorumlusu*

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14 September 2018

MC(18)80

To: **MARINE COMMITTEE**

Copy: **CONSTRUCTION & EQUIPMENT SUB-COMMITTEE**  
**ENVIRONMENT SUB-COMMITTEE**  
**ALL FULL AND ASSOCIATE MEMBERS (for information)**

**PROPOSED ICS SUBMISSION TO MSC 100 REGARDING EFFECTIVE IMPLEMENTATION OF EXISTING PROVISIONS FOR FUEL QUALITY AND SAFETY IN IMO CONVENTIONS**

***Action required: Members are invited to review a draft submission to MSC 100 on the matter of fuel oil quality and safety which has been prepared by the Secretariat and which is attached at Annex. Members are requested to provide comment and indicate their support (or otherwise) for the Secretariat to submit the document to MSC 100 by 25 September 2018.***

Members are informed that the Secretariat has prepared a draft submission to MSC 100 titled "Effective implementation of existing provisions for fuel quality and safety in IMO Conventions". The draft submission was developed in response to the concerns of Members with respect to fuel oil quality and safety.

Members will recall circulars MC(18)63 and MC(18)68 which requested Members to consider whether ICS should co-sponsor a submission to MEPC titled "Safety Implications and Respective Challenges Associated with 2020 Compliant Fuels". Although there was no consensus amongst Members to support co-sponsorship of this document, Members did share the concerns related to fuel oil quality and safety highlighted in the document. Based on feedback received, the Secretariat considers that there would be a consensus to support submitting a document on the matter of fuel oil safety and quality to MSC 100, provided that certain concerns expressed by Members were addressed.

Fuel oil is to meet the provisions of MARPOL Annex VI regulation 14, it is also to be of an appropriate quality and safe to use as required by the provisions of MARPOL Annex VI regulation 18 and SOLAS II-2. Members are concerned to ensure that there is a level playing field for all shipowners on and after 1 January 2020, they are also concerned to ensure that poor quality fuel oil does not endanger seafarers and ships.

The Secretariat has therefore prepared a draft submission to MSC 100 titled "Effective implementation of existing provisions for fuel quality and safety in IMO Conventions", which is attached at Annex. The document is concerned only with safety and highlights that fuel oil quality and safety are existing concerns and not simply a function of changes to MARPOL Annex VI regulation 14 which enter into force on 1 January 2020. However,

it is recognised that these existing concerns may become significantly more acute as the industry implements its transition to 0.5% sulphur fuel in readiness for 2020.

The draft submission asserts that those IMO member states who are parties to MARPOL Annex VI and/or SOLAS already have obligations to regulate fuel oil quality and safety under the provisions of MARPOL VI regulation 18 and SOLAS II-2. The current situation whereby regulation of this safety critical matter is divided across two separate conventions is made more problematic since one of these conventions is subject to the oversight of MSC and with the other is subject to the oversight of MEPC. This arrangement has resulted in a potential conflict of interest as MEPC is responsible for taking decisions which affect both environmental compliance and matters of safety related to fuel oil.

The draft submission provides a number of views and includes three principal proposals for the consideration of MSC:

- The safety provisions of MARPOL Annex VI regulation 18 should be incorporated within SOLAS;
- Encouragement for member states to introduce bunker supplier licensing schemes in order to promote higher standards in the fuel oil supply chain; and
- The IMO Global Integrated Shipping Information System (GSIS) should be improved to provide greater granularity of fuel quality and safety data.

The draft submission does not comment on environmental matters, since it is recognised that such matters are separate and distinct from those concerning safety and are rightfully subject to the oversight of MEPC. If implemented it is considered that the proposals would facilitate more effective implementation of existing requirements and promote improved safety for seafarers and ships by separating safety matters from those related to environmental protection and providing better information management.

The deadline for submission to MSC 100 is 1 October 2018. **Members are therefore requested to review the draft submission as a matter of urgency and advise their support (or otherwise) along with providing any other comments to the undersigned ([john.bradshaw@ics-shipping.org](mailto:john.bradshaw@ics-shipping.org)) by Tuesday 25 September 2018.**

John Bradshaw  
Technical Director

Enclosures:

Annex – Effective implementation of existing provisions for fuel quality and safety in IMO Conventions

MARITIME SAFETY COMMITTEE  
100th session  
Agenda item 2

MSC 100/X/X  
xx September 2018  
Original: ENGLISH

**ANY OTHER BUSINESS**

**Effective Implementation of Existing Provisions for Fuel Quality and Safety in IMO Conventions**

Submitted by ICS.....

**SUMMARY**

*Executive summary:* At the Intersessional Meeting on Consistent Implementation of Regulation 14.1.3 of MARPOL Annex VI (ISWG-AP 1) it was agreed to recommend that MEPC 73 refer fuel oil safety related concerns to MSC 100 for further consideration. This document provides proposals to assist the Maritime Safety Committee to address these concerns and to improve safety. Importantly the co-sponsors emphasise that this is an existing safety matter, however it is expected to become more acute as a result of amendments to MARPOL Annex VI regulation 14 which enter into force on 1 January 2020.

*Strategic Direction, if applicable:*

*Output:*

*Action to be taken:* Paragraph 31

*Related documents:* MSC 98/23, MSC 99/22, MEPC 73/5, ISWG-AP 1/2/12, MEPC.1/Circ.875.

**Introduction**

1 At MSC.99 the Committee noted that MEPC 71 had instructed the PPR Sub-Committee to report safety issues related to low sulphur fuel oil to MSC and that an Intersessional Meeting on Consistent implementation of regulation 14.1.3 of MARPOL Annex VI had been scheduled for July 2018. The Committee further noted that the outcome of consideration of this matter at MEPC 73 would be reported to MSC 100 (MSC 99/22 2.2 – 2.3). The Committee had already taken an interest in fuel safety at MSC 97, and had invited the MEPC to provide it with relevant information on the matter with a view to ensuring that safety aspects were adequately covered (MSC 98/23 22.28).

2 The Intersessional Meeting on Consistent implementation of regulation 14.1.3 of MARPOL Annex VI considered a range of safety related matters related to the use of low sulphur fuel oil and recommended that MEPC 73 invite MSC 100 to consider the outcome of the meeting (MEPC 73/5 16 – 24).

3 The co-sponsors welcome the interest being taken by the Committee in fuel safety related matters, and the recognition of MEPC that safety issues related to fuel oils are within the purview of MSC.

4 The interest of the Committee is a response to safety concerns related to low sulphur fuels which are expected to enter use as the revised MARPOL Annex VI regulation 14.1.3 takes effect in 2020. The co-sponsors consider that fuel safety is an existing concern and that it should not be considered only as a transitional matter for the 2020 changes to the MARPOL Convention. However, it is also recognized that these concerns will become much more acute as a result of changes to MARPOL Annex VI regulation 14, as a result of which it has become a matter of urgency requiring the attention of the Committee.

### **Background**

5 The quality of fuel oil is a safety critical matter, document ISWG-AP 1/2/12 provided a summary of the effects of fuel quality on safety. The safety critical nature of fuel oil quality is already recognised in both the MARPOL and SOLAS Conventions. Whether or not a fuel oil is safe will be determined by the physical composition and qualities of a particular fuel oil, by the requirements of machinery and by arrangements for fuel handling and treatment onboard.

6 MARPOL Annex VI regulation 18.3 prohibits the addition of any substance or chemical waste to fuel oil which:

- jeopardizes the safety of ships or adversely affects the performance of the machinery;
- is harmful to personnel; or
- contributes to additional air pollution.

This clearly establishes responsibilities for parties to MARPOL Annex VI to ensure that fuels supplied within their jurisdiction are suitable for use onboard and will not present a risk to seafarers or ships machinery.

7 SOLAS II-2 regulation 4.2 requires that marine fuel oils must have a flash point of 60°C or higher in order to reduce the risk of fires onboard. This is a longstanding, clear and unambiguous requirement, ships cannot use fuel with a flash point lower than 60°C unless they have been certificated in accordance with the IGF Code.

8 In addition those provisions of the MARPOL and SOLAS Conventions, the industry relies on international standard ISO8217 *Petroleum products -- Fuels (class F) -- Specifications of marine fuels*. This standard defines standard marine fuel oil grades as well as specifying quality parameters for these fuels. The current version of this standard is ISO8217:2017.

9 Paragraphs 5 – 8 of this document make it clear that fuel safety is addressed in both the MARPOL and SOLAS Conventions. If a fuel oil purchaser correctly specifies fuel of the appropriate grade within ISO8217 then the fuel as delivered should be of an appropriate quality and safe to use. Unfortunately, experience indicates that this is not always the case.

10 The co-sponsors recognize that the great majority of fuel oil supplied to ships is of a satisfactory quality and safe to use, however the size of the market for marine fuel oil

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(approximately 300 million tonnes per annum) means that even a very small percentage of this total is still a significant issue and cannot be treated as merely a statistical outlier not warranting further attention.

11 For example, the co-sponsors draw attention to a series of linked problems reported this year. A batch of off spec fuel in the US Gulf ports initially affected over 100 ships crewed by approximately 2000 seafarers. The effects of this fuel included engine failure and damage to machinery and fuel handling equipment, the problem is believed to have been use of inappropriate cutter stock, the standard fuel analysis tests did not identify the problem. Similar onboard problems were reported with fuel loaded in Panama and Singapore several weeks later. In August it was estimated that by that point over 200 ships had been affected.

12 Although most of the major bunker stations used by the shipping industry are located within countries which are parties to MARPOL Annex VI, this is not the case for all of them. Hence, regulating fuel oil safety via the SOLAS Convention would provide wider coverage of bunker stations.

13 Although shipowners have fuel oil delivered to their ships tested, the standard tests cannot identify all possible contaminants. In the minority of cases where fuel oil quality is compromised to the point where it becomes a risk to safety, it is common that the standard tests have not identified any cause for concern. This means that by the time the crew is aware of a problem the engine and fuel systems may already have been damaged and/or suffer degraded performance, presenting a risk to safety.

14 If a ship loses power as a result of blocked fuel filters, fuel pump failure, failure of fuel separators or damage to the engine then the consequences are determined by luck. For example the position of the ship and proximity to other ships or structures when power is lost. Even in cases where the engine continues to operate but with degraded performance, whether the ship suffers serious consequences is determined to a great extent by luck. For example if the ship is in proximity to land in an area of strong currents or adverse weather then a reduction in available power might have the same ultimate effect as a complete breakdown. The fact that in most cases ships are able to safely anchor, or continue at reduced power while repairs are made or fuel systems reconfigured should not obscure the fact that in slightly different circumstances these incidents could easily result in allusion, collision or grounding.

15 Whether or not a particular fuel is appropriate for a ship is determined to some extent by the onboard arrangements, for example not all ships are able to operate using residual fuel oils. However, even where ships are provided with the necessary systems to operate with residual fuel oils, the fuel must still meet certain quality requirements and meet the fuel specifications provided by machinery suppliers. Classification approvals for machinery and equipment are predicated on operators using fuel of appropriate quality. For example the LR rules for machinery (to take just one example) stipulate that *Machinery is to be capable of operating at defined power ratings with a range of fuel grades specified by the engine, boiler or machinery manufacturer and agreed by the Owner/Operator.*

16 Although safety is regulated by the SOLAS Convention, supported by other associated codes and classification society rules, aspects of fuel safety are regulated by the MARPOL Convention. This has created a division of responsibility between two Committees for this safety critical matter, it has also led to some conflation between matters of safety and environmental protection which is considered to be unhelpful.

## Discussion



17 The co-sponsors assert that matters of fuel safety must be considered solely as a safety matter. Whilst recognizing that the matter is particularly topical because of the amendments to MARPOL Annex VI regulation 14 which enter into force on 1<sup>st</sup> January 2020, concerns about fuel quality and safety have existed for many years and should not be conflated with environmental compliance.

18 The co-sponsors recognize the responsibility of fuel oil purchasers to correctly specify appropriate fuel for their needs, recognizing the capabilities and fuel handling and treatment arrangements of ships for which the fuel oil is ordered. Where a fuel oil purchaser correctly specifies the appropriate fuel they should have confidence that the fuel which is delivered will meet the agreed specification and also be compliant with applicable requirements of MARPOL and SOLAS. Just as it is for the purchaser to correctly specify fuel to be delivered to a ship, it is the responsibility of the fuel supplier to ensure that the fuel which is delivered complies with the agreed specification and applicable statutory requirements. This principle underpins the *IMO Guidance on Best Practice for Fuel Oil Purchasers/Users for Assuring the Quality of Fuel Oil Used on Board Ships* (MEPC.1/Circ.875, paragraph 1.2).

19 Fuel quality and safety is addressed in IMO instruments, primarily by SOLAS II-2 and MARPOL Annex VI regulation 18. Although the requirements provided in MARPOL Annex VI regulation are generic and high level in nature, if satisfactorily applied they would ensure that fuel supplied to ships is safe to use.

20 Experience indicates that whilst parties to the SOLAS Convention actively enforce the provisions of SOLAS II-2, there is a more uneven approach by parties to MARPOL Annex VI in enforcing regulation 18 of that convention. There appears to be a widely held view amongst parties to MARPOL Annex VI that fuel quality is a commercial matter, not a regulatory matter related to the safety of seafarers and ships.

21 Whilst the co-sponsors recognize that IMO regulates ships, not fuel refiners and blenders, they would also highlight the fact that parties to MARPOL Annex VI have accepted obligations under regulation 18 of the annex which do extend their responsibilities to regulating the fuel supply chain. Further, it is essential for safety of seafarers and ships that these obligations are properly fulfilled.

22 The fact that some matters of fuel safety are addressed in the SOLAS Convention, and others in the MARPOL Convention has resulted in a fractured regulatory structure for this safety critical matter, with a split of responsibility between the MEPC and MSC.

23 A lack of granularity in the IMO Global Integrated Shipping Information System (GISIS) module for MARPOL Annex VI regulation 18.9.6 means that in order to identify reports of unsafe fuel it is necessary to go through each report, the great majority of which concern non-conformities which whilst serious and reportable do not threaten safety.

24 MARPOL Annex VI regulation 18.9.1 requires parties to maintain a register of bunker suppliers, these registers are generally just supplier directories with no quality checks applied to gain admission to the register. Therefore, for the most part they provide no useful information about whether those in the register are quality orientated suppliers. As a related observation, in some cases these registers are not easy to find.

25 A measure which could improve fuel quality and mitigate the safety risks associated with poor quality fuel oil would be for member states to implement fuel oil supplier licensing schemes. This would impose quality requirements on, and promote more effective regulation of, fuel oil suppliers. Such a scheme has been implemented in Singapore, the co-sponsors

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welcome the action of Singapore in this matter and consider that it has resulted in improvements to the fuel oil supply chain in that country.

26 Information regarding cases where unsafe fuel has been supplied should be more readily available, this could be addressed by making changes to GSIS to provide greater granularity and a search function.

27 Separating safety and environmental matters by inserting all fuel safety related requirements in the SOLAS Convention would end the fractured nature of how fuel oil safety is regulated in IMO instruments. This would facilitate a single Committee, MSC, taking ownership of fuel safety matters and would promote more effective regulation for this safety critical matter.

### **Proposal**

28 The co-sponsors propose that IMO should review MARPOL Annex VI regulation 18 with a view to identifying those requirements which are concerned with safety, rather than with reducing emissions to air. The Organization could then consider appropriate regulatory amendments to incorporate these provisions within the SOLAS Convention. This would separate fuel oil safety from emissions to air and ensure that fuel safety matters were considered by MSC. MEPC would continue to regulate fuel oil matters which are related to environmental protection and emissions to air. This would end the current unsatisfactory situation of a safety critical issue (fuel oil safety) being addressed in two separate Conventions which are managed by two separate Committees of the Organization and facilitate transparency and clarity by ensuring that safety matters are considered only in the context of safety. This would avoid potential conflicts of interest between safety and environmental protection which exist under current arrangements whereby MEPC is responsible for regulating some aspects of fuel oil safety.

29 The Organisation should consider means by which the current requirement to maintain a register of bunker suppliers could be amended to encourage parties to MARPOL Annex VI to establish bunker supplier licensing schemes. Details for these schemes, including fuel oil suppliers with the necessary accreditation could then be provided in GSIS to facilitate effective information sharing.

30 GSIS should be improved to provide greater granularity of fuel quality and safety reports which are uploaded onto the system. This could be achieved by creating a new GSIS module for fuel oil safety matters, separating reporting of fuel oil safety from reporting of fuel oil issues under MARPOL Annex VI regulation 14 and other reportable matters which do not affect safety.

31 The co-sponsors accept that these proposals would not in themselves address all fuel quality and safety issues. However, they would provide effective measures to improve safety for seafarers and ships by promoting more effective regulation of fuel oil and be a significant improvement over the current situation. Importantly, they would separate matters related to safety from those related to emissions to air and environmental protection.

### **Action requested of the Committee**

32 The Committee is invited to consider the proposals in paragraphs 25 – 28 and take action as appropriate.