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23.08.2021

Konu : Sierra Leone'de Uygulanan "IMO 2020 Hizmet Bedeli" Hk.

Sirküler No: 892

Sayın Üyemiz,

Uluslararası Deniz Ticaret Odası (International Chamber of Shipping-ICS) tarafından Odamıza gönderilen, 10.08.2021 tarihli Ek-1'de sunulan yazı ile;

Sierra Leone Cumhuriyeti tarafından Temmuz 2021 ayından itibaren, Free Town Limanı, Peppel, Nitti ve Özel Demirleme Alanlarına gelen gemiler için her uğrakta, gemide kullanılmak üzere bulunan bir ton yakıt başına 15 ABD Dolarına kadar yeni bir "IMO 2020 Hizmet Bedeli"nin uygulanacağını bildiren ve Ek-2'de yer alan bir tebliğ yayınladığı belirtilmektedir.

Ayrıca, geminin egzoz gazı temizleme sistemi (scrubber) ile donatılma durumuna bakılmaksızın, % 0,5 kükürt içeriği sınırına uymayan yakıt taşıdıkları tespit edilmesi durumunda, gemi sahiplerinin ve işletenlerin 1 Eylül 2021 tarihinden itibaren 15.000 ABD Doları tutarında ceza ile karşı karşıya kalabilecekleri ifade edilmektedir.

Yukarıda yer alan sebeplerden dolayı ICS tarafından, Ek-3'te sunulan bilgi notu ile Uluslararası Denizcilik Örgütü (International Maritime Organization-IMO), Denizcilik Danışma Grubu (Consultative Shipping Group-CSG) ve Avrupa Komisyonu (ECSA ile işbirliği içinde) ile temasa geçildiği, bahse konu bilgi notunda denizcilik sektörünün Küresel Kükürt Üst Limiti kuralı ile yeni ulusal "IMO 2020 Hizmet Bedeli" arasındaki olası uyumsuzluk ve bunun oluşturabileceği olumsuz örnekler hakkındaki çekincelerinin yer aldığı bildirilmektedir.

Bu kapsamda, konu hakkında denizcilik sektörünün çekincelerine, ICS tarafından gerçekleştirilen eylemlere ve sektör paydaşlarının durumuna yönelik bilgileri içeren ICS'in yazısının Türkçe tercümesi Ek-4'te sunulmaktadır.

Bilgilerinize arz/rica ederim.

Saygılarımla,

Cengiz ÖZKAN
Genel Sekreter V.**Ek:**

- 1- ICS'in 10.08.2021 Tarihli Yazısı (3 sayfa)
- 2- Sierra Leone Liman İdaresi'nin Tebliği (4 sayfa)
- 3- ICS'in Bilgi Notu (1 sayfa)

Bu belge, 5070 sayılı Elektronik İmza Kanuna göre Güvenli Elektronik İmza ile İmzalanmıştır.

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4- ICS'in Yazısının Türkçe Tercümesi (2 sayfa)

Dağıtım:

Gereği:

- Tüm Üyeler (WEB sayfası ve e-posta ile)
- İMEAK DTO Şube ve Temsilcilikleri
- Türk Armatörler Birliği
- S.S. Gemi Armatörleri Motorlu Taşıyıcılar Kooperatifi
- GİSBİR (Türkiye Gemi İnşa Sanayicileri Birliği Derneği)
- VDAD (Vapur Donatanları ve Acenteleri Derneği)
- TÜRKLİM (Türkiye Liman İşletmecileri Derneği)
- KOSDER (Koster Armatörleri ve İşletmecileri Derneği)
- Yalova Altınova Tersane Girişimcileri San.ve Tic.A.Ş.
- UTİKAD (Uluslararası Taşımacılık ve Lojistik Hizmet Üretenleri Derneği)
- TAİS (Türk Armatörleri İşverenler Sendikası)
- WISTA Türkiye Derneği
- Türk Uzakyol Gemi Kaptanları Derneği
- GEMİMO (Gemi Makineleri İşletme Mühendisleri Odası)

Bilgi:

- Yönetim Kurulu Başkan ve Üyeleri
- İMEAK DTO Şube YK Başkanları
- İMEAK DTO Çevre Komisyonu
- İMEAK DTO Meslek Komite Başkanları

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10 August 2021

SPC(21)27

TO: SHIPPING POLICY COMMITTEE

**Copy: MARINE COMMITTEE
ALL FULL AND ASSOCIATE MEMBERS (For Information)**

SIERRA LEONE: IMO 2020 SULPHUR CAP SERVICE CHARGE

Action Required: To note that in July, the government of the Republic of Sierra Leone issued a notification, attached at Annex A, advising that a new 'IMO 2020 Service Charge' of up to \$15 (USD) per metric ton of bunker fuel on board, will be imposed (per visit) on all ships calling to the Port of Free Town, Peppel, Nitti and Dedicated Anchorage Areas. In addition, it warns that shipowners and operators could face a penalty of \$15,000 USD from 1 September if found to be carrying fuel oil non-compliant with the 0.5% limit on sulphur content, irrespective of whether the vessel is fitted with an exhaust gas cleaning system. ICS has therefore contacted the IMO Secretariat, the Consultative Shipping Group (CSG) and the European Commission (in collaboration with ECSA) with a briefing note (see Annex B), outlining industry's concerns about the potential incompatibility between the global 2020 sulphur cap regulation and the new national 'IMO 2020 service charge' and the negative precedent this might set. In response, the IMO Secretariat are currently in contact with the Sierra Leone Maritime Authority, and have requested that ICS raise this issue formally which would allow them to explore additional options. Members are therefore encouraged to contact the Secretariat (helio.vicente@ics-shipping.org and sunil.krishnakumar@ics-shipping.org) with any reports from their companies which could corroborate the issues posed by this service charge.

Background

In July, the government of the Republic of Sierra Leone issued a notification, attached at **Annex A**, related to the national implementation of the IMO 2020 sulphur cap regulations. The notification stipulates that the Sierra Leone Ports Authority, in consultation with the Ministry of Transport and Aviation, and alongside "a competent institution for efficiency and standardization", would jointly oversee the implementation and enforcement of the regulations as of 15 July 2021.

The Government's notice also introduced a new so called "IMO 2020 Service Charge on Vessels Calling at the Port of Free Town, Peppel, Nitti and Dedicated Anchorage Areas". It appears to suggest that a new charge of up to \$15 (USD) per metric ton of bunker fuel on

board the ship, will be imposed (per visit) on any ship calling to the aforementioned ports or anchorage areas (covering all vessel types and sizes). **The first invoices from the government were expected by 30 July 2021.**

Industry concerns regarding new service charge

While industry recognises the importance of Sierra Leone implementing and enforcing the global sulphur cap regulations, ICS is concerned that this new “IMO 2020 service charge”, in addition to being superfluous, goes far beyond the scope and spirit of the limit set in Annex VI of the MARPOL Convention. The title of the charge is also misleading, giving the impression that it is an IMO endorsed fee or part of the IMO regulatory framework for reducing sulphur emissions.

Equally concerning is the fact that from 1 September 2021, shipowners and operators could face penalties of \$15,000 (USD) *“should they continue to carry fuel that contains sulphur content higher than 0.5 percent even though the ship has an exhaust gas cleaning system”*.

This new policy is contrary to the implementation of the IMO regulation, noting that MARPOL Annex VI (Regulation 4) allows for ships with approved EGCS to use fuel oil with a sulphur content higher than 0,5% (i.e. HSFO). The new notification also fails to recognise the very limited circumstances and conditions which might provide a valid reason for shipowners to be issued with a Fuel Oil Non-Availability Report (FONAR) if a vessel is unable to obtain compliant fuel oil.

ICS Action

In response to the notification made by the government of the Republic of Sierra Leone, ICS contacted the IMO Secretariat, the Consultative Shipping Group, and the European Commission (in collaboration with ECSA), to make the organisations aware of the issue. An updated briefing note is attached at **Annex B** for members’ ease of reference.

The briefing document outlines the industry’s concerns regarding this new charge, highlighting the potential incompatibility between the global 2020 sulphur cap regulation and the new national IMO 2020 service charge. It is hoped that such an intervention may provide the necessary impetus for the government to revoke this initiative.

Current status of advocacy efforts

IMO

In response to the ICS request to intervene on this matter, the IMO Secretariat has contacted the Sierra Leone Maritime Authority and the General Manager of the Sierra Leone Port Authority, who in turn suggested that the implementation of the new service charge had been agreed between the government and all the shipping agents **(presumably not the companies directly)** during a recent meeting. The Port Authority further noted that the charge represents an ‘administration fee’ for “carrying out the emissions test which all the parties agreed to”.

The above notwithstanding, the IMO Secretariat agreed that the new fee is a matter of concern and a practice that could potentially be replicated in other ports. However, the

IMO Secretariat also suggested that they would be unable to take any further action unless ICS formally expresses its concerns regarding the charge to the IMO, which would allow them to explore additional options. Further discussion between ICS and IMO is expected this month for agreement on the way forward.

In the meantime, it would be very helpful if ICS member national associations and their member companies could provide any additional corroborating information that highlights the concerns of shipping companies regarding this new service charge. So far, ICS has only received such reports from 2 shipping companies impacted by the charge. The names of companies affected will be omitted from any external communication with IMO and other organisations.

CSG

Given the leadership role of CSG countries at the IMO, the group is well placed to discuss and raise concerns at governmental level about the incompatibility between the global 2020 sulphur cap regulation and the new national 'IMO 2020 service charge'. The Secretariat has received confirmation from the CSG that they are already assessing the status of this regulation and are considering the next steps, including a potential approach to the Sierra Leone Government.

European Commission

ICS and ECSA jointly produced a briefing document, shared with both DG TRADE and DG MOVE, requesting intervention from the Commission on this issue. As the EU is one of Sierra Leone's main trade partners, and has a delegation in the country, it is hoped that pressure from the European Commission will strengthen the advocacy efforts to have this charge repealed. A response from the Commission is expected in the coming days or weeks.

Members are encouraged to contact the Secretariat (helio.vicente@ics-shipping.org and sunil.krishnakumar@ics-shipping.org) with any reports from their companies which could corroborate the issues posed by this service charge.

Georgia Spencer-Rowland
Policy Adviser



SIERRA LEONE PORTS AUTHORITY

**ADDRESS TO
SEE BELOW**

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PMB 386 CLINE TOWN
FREETOWN, SIERRA LEONE
TELEPHONE: +232-76310734
Website: www.freetownport.com
Email: afofana@slpa.sl

Our Ref: SLPA/GM/06/07/2021/1

Date: 6th July, 2021

Dear Sir

Introduction

IMO 2020 is a term used to describe the implementation of the Regulations to Annex VI of the International Convention for the Prevention of Pollution from Ships (MARPOL). MARPOL is one of the most important international marine environmental conventions and IMO 2020 aims to improve air quality and protect the environment by reducing Sulphur Oxide produced by ships.

With effect from January 1, 2020, ships will be required to use:

1. fuel oils with a Sulphur content of 0.5 percent m/m or lower;
2. an approved equivalent means of compliance such as exhaust gas cleaning systems (EGCS) commonly referred to as "scrubbers"; or
3. Non-fuel oil alternatives such as switching to Liquefied Natural Gas (LNG) as fuel.

It is anticipated that, at least initially, most ships will utilize new blends of fuel oil which meet the 0.5 percent limit on Sulphur in fuel oil or compliant marine gas or diesel oil.

It is important to note that IMO 2020 will not affect designated emission control areas (ECAS) where there is already a stricter Sulphur limit of 0.1 percent m/m in place, such as in the Baltic Sea, the North Sea, the North American ECA and the US Caribbean ECA as well as the 0.1 percent Sulphur cap already in place in European Union ports.

Implementation and enforcement of IMO 2020

Following the 74th session of the IMO's Marine Environment Protection Committee (MPEC), the IMO released the 2019 Guidelines for Consistent Implementation of the 0.5 percent Sulphur Limit under MARPOL Annex VI (the 2019 Guidelines), which aim at ensuring a consistent implementation of IMO 2020 across port and flag states. In addition, the 2019 Guidelines provide helpful guidance to state parties on interpreting their obligations under and implementing IMO 2020.

Enforcement, compliance and monitoring of the IMO 2020 Sulphur limit is the responsibility of the state parties that have ratified MARPOL and acceded to Annex VI and are therefore obliged to give effect to and enforce its provisions. Accordingly, this directive includes flag states (in whose registries ships are flagged) and port states obliged to enforce IMO 2020 within their territorial waters.

Port states must enforce the provisions of MARPOL by monitoring vessels within their territorial waters and reporting non-compliance to the relevant flag state. This reporting ensures that there is adequate low Sulphur compliant fuel available within their jurisdiction and provides shore-based facilities for the receipt and removal of scrubber waste. Against this background, the Sierra Leone Ports Authority in consultation with the Ministry of Transport and Aviation, had consented to implement this important International member state mandate in July, 2021. It is also important to note that Sierra Leone is 18 months behind the global mandate to implement IMO 2020 statutory instrument. In view of the above, the Sierra Leone Ports Authority will serve as the consulting Government agency to implement IMO 2020. Furthermore, the Port Authority will undertake a joint implementation of the same with a competent institution for efficiency and standardization.

The implementation of IMO 2020 in Sierra Leone

Following consultative meetings between the Government of Sierra Leone and the Sierra Leone Ports Authority on one hand and registered shipping lines in Sierra Leone, on the other hand, several deliberations were held surrounding the implementation of IMO 2020 at the Port of Freetown. After careful consideration of the various outcomes from the consultative meetings, the Ministry of Transport and Aviation and Sierra Leone Ports Authority wishes to inform all Shipping lines and Registered Agencies that **the implementation of IMO 2020 in Sierra Leone will take effect from the July 15 2021. Below are the implementation guidelines for the attention of all Shipping lines and Agencies.**

1.0 VALIDITY OF VESSEL'S COMPLIANCE CERTIFICATE

- 1.1 The validity of the Compliance Certificate for vessels are as follows:
- a. Certificate for Vessels greater than 500 GRT will be valid for **7 days**
 - b. Certificate for Vessels lesser than 500 GRT will be valid for **5 days**

2.0 IMO 2020 SERVICE CHARGE ON VESSELS CALLING AT THE PORT OF FREETOWN, PEPEL, NITTI AND DEDICATED VESSELS ANCHORAGE AREAS

2.1 The IMO Implementation tariff is as follows

NO	TOTAL BUNKER ONBOARD (MT)	TONNAGE COST PER METRIC TON (\$)
1	001 - 300	15
2	301 - 500	14

3	501 - 750	13
4	751 - 1000	12
5	1001 - Above	11

3.0 IMPLEMENTATION TIMELINE AND INVOICING FORMALITIES

- 3.1 The commencement date will be on July 15 2021. This cuts across for all vessel types and sizes.
- 3.2 Invoicing will be per vessel attendance. Bill notification will be sent to the client immediately after attendance together with the Compliance Certificate.
- 3.3 Bill notifications will be accumulated on a monthly basis for each client, and a monthly invoice generated and sent to the client on the last day of each calendar month.
- 3.4 Based on the above commencement date, it is expected that the first set of invoices will be sent out to various clients on July 30 2021.

4.0 PENALTY ON VESSEL FOR NON COMPLIANCE WITH IMO 2020

The Port of Freetown will extend a grace period spanning from 15th July, 2021 – 31st August, 2021 for vessels that are non compliance.

Penalties would not be instituted against defaulting or Non- compliance vessels on or before 31st August, 2021. However, a non compliance report together with a warning letter would be issue to such vessel for corrective action to be taken against their next call at the Port and within this grace period as stipulated above.

Effective 1st September, 2021 ships owners and operators could face ship penalties of **\$15,000** (Fifteen Thousand United States Dollars) should they continue to carry fuel that contains sulphur content higher than 0.5 percent even though the ship has an exhaust gas cleaning system

It is also important to note that tariffs and fines attached therein are subjected to periodic reviews based on prevailing circumstances.

5.0 CONCLUSION

Much work remains to be done to ensure a consistent approach to compliance with IMO 2020. Given that Sierra Leone is 18 months behind the global implementation date (January 1, 2020); the Port Authority will take appropriate measures to ensure compliance by initial inspections based on documents and other methods such as remote sensing and portable devices. If there are clear grounds to conduct a more detailed inspection, sample analyses and other detailed inspections can be undertaken. The samples to be analyzed may be the representative samples provided with the Bunker Delivery Note.

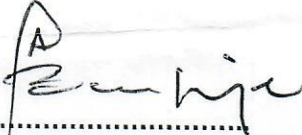
The Authority further wish to assure its valued clients that, All possible efforts will be made to avoid the ship being unduly detained or delayed; especially the sample analysis will not unduly delay the operation, movement or departure of ships.

Finally, the Authority wishes to express its sincere thanks and appreciation to all Shipping Lines and Agencies for your continued support towards improving our Port and our collective efforts towards meeting up with our international obligations.

Yours faithfully

For and on behalf of

SIERRA LEONE PORTS AUTHORITY



Dr. Abdulai Fofana
General Manager

Addressed to:

The General Manager, Maersk Line, Sierra Leone
The General Manager, CMA, CGM
The General Manager, MSC
The General Manager, Bollore Transport and Logistics
The General Manager, OBT Shipping Agency
The General Manager, SLNSC
The General Manager, Trans Sahara Shipping Company
The General Manager, Destiny Shipping Agency
The General Manager, Integrated Service Solution
The General Manager, AMA
The General Manager, IMATRIX 101
The General Manager, Global Logistics Shipping Company

Copy: Minister of Transport and Aviation
Deputy Minister of Transport and Aviation
Permanent Secretary, MoTA
Deputy General Manager, SLPA
Operation and Monitoring Manager, SLPA
Company Secretary, SLPA
Harbour Master, SLPA
Security and Intelligence Manager, SLPA

Briefing Note Regarding Global Shipping Sector Concerns about a New so-called “IMO 2020 Service Charge” for Implementation of IMO Sulphur Cap Regulations in Sierra Leone

The International Chamber of Shipping (ICS) has been made aware that on 6 July, the government of the Republic of Sierra Leone issued a notification, **attached** for ease of reference, related to national implementation of the IMO 2020 sulphur cap regulations.

A new so-called IMO 2020 service charge

The notification stipulates that the Sierra Leone Ports Authority in consultation with the Ministry of Transport and Aviation, and alongside “a competent institution for efficiency and standardization” would jointly oversee the implementation and enforcement of the regulations as of this month (15 July 2021).

The Government’s notice also introduced a new so called “*IMO 2020 Service Charge on Vessels Calling at the Port of Free Town, Peppel, Nitti and Dedicated Anchorage Areas*”. It appears to suggest that a new charge of up to \$15 (USD) per metric ton of bunker fuel on board the ship, will be imposed (per visit) on any ship calling to the aforementioned ports or anchorage areas (covering all vessel types and sizes). The first invoices from the government are expected on 30 July 2021.

ICS concerns regarding new service charge

The industry continues to invest in ways to address its environmental responsibilities, acknowledging the additional impact that potential seaborne trade growth rates could have on the environment unless dealt with appropriately. This includes considerable investments to address the impact of sulphur emissions from ships.

While it is a welcome and positive move by Sierra Leone to implement and enforce the global sulphur cap regulations, ICS is concerned that this new “IMO 2020 service charge”, in addition to being superfluous, also goes far beyond the scope and spirit of the limit set in Annex VI of the MARPOL Convention. The title of the charge is also misleading, giving the impression that it is an IMO endorsed fee or part of the IMO regulatory framework for sulphur emissions.

Barring a mistake in the government’s notification document, equally concerning is the fact that from 1 September 2021, shipowners and operators could face penalties of \$15,000 (USD) “should they continue to carry fuel that contains sulphur content higher than 0.5 percent even though the ship has an exhaust gas cleaning system”.

This new policy is therefore contrary to the implementation of the IMO regulation, noting that MARPOL Annex VI (Regulation 4) allows for ships with approved EGCS to use fuel oil with a sulphur content higher than 0,5% (i.e. HSFO). To our knowledge, this initiative is unprecedented compared to how other IMO Member States are implementing and enforcing the regulation around the world.

The new notification also fails to recognise the very limited circumstances and conditions which might provide a valid reason for shipowners to be issued with a Fuel Oil Non-Availability Report (FONAR) if a vessel is unable to obtain compliant fuel oil.

SIERRA LEONE: IMO 2020 KÜRESEL KÜKÜRT ÜST LİMİTİ HİZMET BEDELİ

Sierra Leone Cumhuriyeti tarafından Temmuz 2021 ayında, Uluslararası Denizcilik Örgütü (IMO) 2020 Kükürt Üst Limiti düzenlemelerinin ulusal ölçekte uygulamasıyla ilgili olarak bir tebliğ yayınlanmıştır. Bahse konu tebliğ ile, Sierra Leone Liman İdaresinin, Ulaştırma ve Havacılık Bakanlığı'yla istişare halinde ve "verimlilik ve standardizasyon için yetkili bir kurum" ile birlikte, 15 Temmuz 2021 tarihinden itibaren düzenlemelerin uygulanmasını ve ortaklaşa denetleyeceği öngörülmektedir.

Ayrıca tebliğ, "Free Town Limanı, Peppel, Nitti ve Özel Demirleme Alanlarındaki Gemiler için IMO 2020 Hizmet Bedeli" olarak adlandırılan yeni bir uygulama getirmektedir. Belirtilen limanlara veya demirleme alanlarına gelen tüm tip ve büyüklükteki gemiler için her uğrakta, gemide kullanılmak üzere bulunan bir ton yakıt başına 15 ABD Doları tutarında hizmet bedeli uygulanacağı görülmektedir. Uygulama ile ilgili ilk faturaların 30 Temmuz 2021 tarihinde Sierra Leone Hükümeti'nden alınması beklenmiştir.

Yeni "Hizmet Bedeli" Uygulamasına Yönelik Denizcilik Sektörünün Çekinceleri

Denizcilik sektörü, küresel kükürt üst limiti düzenlemelerinin Sierra Leone tarafından uygulanması ve zorunlu tutulmasının önemini kabul etmektedir. Ancak ICS, yeni "IMO 2020 Hizmet Bedeli" uygulamasının gereksiz olduğunu düşünmekte, MARPOL Ek-VI'da belirlenen üst limit kuralının kapsamı ve yapısının çok ötesinde olduğuna kanaat getirerek endişe duymaktadır. Hizmet Bedeli uygulamasının isminin de yanıltıcı olduğu, bu uygulamanın IMO tarafından onaylanmış bir hizmet bedeli veya kükürt emisyonlarını azaltmaya yönelik IMO düzenleyici çerçevesinin bir parçası olduğu izleniminin yansıtıldığı değerlendirilmektedir.

1 Eylül 2021 tarihinden itibaren gemi sahiplerinin ve işletenlerin "*gemide egzoz gazı temizleme sistemi (scrubber) tesis edilmiş olsa bile % 0,5'ten daha yüksek kükürt içeriğine sahip yakıt bulundurmaya devam etmeleri halinde*" 15.000 ABD Doları tutarında ceza ile karşı karşıya kalacak olmaları da endişe yaratmaktadır.

MARPOL Ek-VI Kural 4 uyarınca, onaylı scrubber sistemiyle donatılan gemilerin %0,5'ten daha yüksek kükürt içeriğine sahip yakıt kullanabileceği göz önünde bulundurulduğunda, Sierra Leone tarafından uygulanan "hizmet bedeli"nin IMO Küresel Kükürt Üst Limiti kuralına aykırı olduğu düşünülmektedir. Aynı zamanda yeni tebliğ, bir geminin uygun yakıt elde edememesi durumunda, gemi sahiplerine Uygun Yakıt Eksikliği Raporu (Fuel Oil Non-Availability Report-FONAR) verilmesi için geçerli bir neden sağlayan çok sınırlı durum ve koşullarla da tutarsızlık oluşturmaktadır.

ICS Tarafından Gerçekleştirilen Eylemler

Sierra Leone Cumhuriyeti'nin yayınladığı tebliğe ilişkin olarak ICS tarafından, denizcilik sektörü kuruluşlarını gelişmelerden haberdar etmek için IMO ve Denizcilik Danışma Grubu'nun (Consultative Shipping Group-CSG) yanı sıra Avrupa Topluluğu Armatörler Birliği (European Community Shipowners' Associations-ECSA) vasıtasıyla Avrupa Komisyonu ile temasa geçilmiş olup konu ile ilgili Ek-4'te yer alan bilgi notu hazırlanmıştır.

Bahse konu bilgi notu, IMO 2020 Küresel Kükürt Üst Limiti kuralı ile yeni ulusal "IMO 2020 Hizmet Bedeli" arasındaki uyumsuzluğun altını çizerek, sektörün bu yeni uygulama ile ilgili

çekincelerini özetlemektedir. Böyle bir bilgilendirmenin, Sierra Leone tarafından yapılan bu girişimin iptal edilmesine yönelik gerekli ivmeyi sağlayacağı öngörülmektedir.

Destek Veren Tarafların Mevcut Durumu

• Uluslararası Denizcilik Örgütü

ICS'in konuya müdahale talebi üzerine, yeni "Hizmet Bedeli"nin uygulanması hususunun hükümet ve tüm gemi acenteleri arasında yakın tarihli bir toplantıda kararlaştırıldığını belirten Sierra Leone Denizcilik İdaresi ve Sierra Leone Liman İdaresi Genel Müdürü ile IMO tarafından temasa geçilmiştir. Liman İdaresi tarafından, söz konusu ücretin "tüm tarafların kabul ettiği emisyon testinin gerçekleştirilmesi" için bir "idare ücreti" olduğu belirtilmiştir.

Konu hakkında yapılan açıklamalara rağmen IMO tarafından, yeni bir ücretlendirme uygulamasının endişe konusu olduğu ve muhtemelen diğer limanlarda tekrarlanabilecek bir uygulama olduğu kabul edilmiştir.

Bununla birlikte Uluslararası Denizcilik Örgütü, ICS tarafından yeni uygulamaya ilişkin alternatif sunulmadan resmi bir şekilde çekinceler ifade edilmedikçe konu hakkında herhangi bir işlem yapılmayacağını belirtmiştir. ICS ve IMO arasında, ileriye dönük anlaşma için bu ay içerisinde görüşme yapılması beklenmektedir.

Ayrıca, ICS üyesi ulusal birlikler ve üye şirketleri tarafından, denizcilik sektörünün bu yeni "Hizmet Bedeli" ile ilgili çekincelerini belirten ilave bilgiler sağlanmasının çok faydalı olacağı düşünülmektedir. Bahsi geçen bilgileri içeren raporlar, şimdiye kadar hizmet bedeli uygulamasından etkilenen iki denizcilik firması tarafından ICS'e iletilmiştir. Bu durumdan etkilenen firmaların isimleri, IMO ve diğer kuruluşlar ile herhangi bir şekilde paylaşılmayacağı belirtilmektedir.

• Denizcilik Danışma Grubu

CSG ülkelerinin IMO'daki liderlik rolü göz önüne alındığında Danışma Grubu, Küresel Kükürt Üst Limiti kuralı ile yeni ulusal "IMO 2020 Hizmet Bedeli" arasındaki uyumsuzluk hakkında hükümet düzeyinde değerlendirmelerin yapılması ve çekincelerin dile getirilmesi için iyi bir konumda yer almaktadır. CSG tarafından, Sierra Leone Hükümeti'ne sunulacak farklı bir yaklaşım da dahil olmak üzere yeni bir düzenlemenin değerlendirildiği belirtilmiştir.

• Avrupa Komisyonu

ICS ve ECSA tarafından, Avrupa Komisyonu Ticaret Genel Müdürlüğü (DG TRADE) ile Mobilite ve Ulaştırma Genel Müdürlüğü'yle (DG MOVE) paylaşılan, Avrupa Komisyonu'ndan bu konuda müdahale talep eden bir bilgi notu hazırlanmıştır. Sierra Leone'nin ana ticaret ortaklarından birisi konumundaki Avrupa Birliği, ülkede bir delegasyona sahip olduğundan, Avrupa Komisyonu tarafından yapılan baskının "Hizmet Bedeli" uygulamasının kaldırılması yönündeki savunma çalışmalarını güçlendireceği düşünülmektedir. Önümüzdeki süreçte Avrupa Komisyonu'ndan bir yanıt beklenmektedir.

Bahse konu "Hizmet Bedeli" uygulamasına yönelik sorun yaşanması halinde konu hakkındaki raporların helio.vicente@ics-shipping.org ve sunil.krishnakumar@ics-shipping.org e-posta adreslerine iletilmesi önerilmektedir.