



SUBJECT: IMO Sulphur Cap 2020

REFERENCE:

- a) *International Convention for the Prevention of Pollution from Ships (MARPOL)*
- b) *Agreement covering delegation of Statutory Services.*

TO: Ship-owners, operators, masters and officers of Antigua and Barbuda flagged ships, and recognized organizations

1. INTRODUCTION

This Information Notice draws attention of all persons involved in operating vessels to the limit for Sulphur in fuel oil used onboard ships operating outside designated emission control areas.

2. SUBJECT

1. From the 1 January 2020, the limit for Sulphur in fuel oil used onboard ships operating outside designated emission control areas, will be reduced to 0.50% m/m (mass by mass), from 3.50% m/m.
2. For ships operating in a Sulphur Emission Control Area (ECAs) under MARPOL, the limit will remain unchanged at 0.10% m/m, as it has been since 1 January 2015.
3. On 1 March 2020, a carriage ban comes into force, that prohibits the carriage of non-compliant fuel oil for combustion purposes for propulsion, or operation onboard ships, unless the ship has a scrubber installed.
4. The ban mandates that fuel oil used onboard ships must not exceed the 0.50% Sulphur limit.
5. Therefore, carriage of fuel oil for use onboard ships will be prohibited from 1 March 2020, if the sulphur content is more than 0.50%, but this does not apply to fuel oil being carried as cargo.
6. It is possible that despite best efforts, a ship may not be able to obtain compliant fuel.
7. In this case, the ship must complete a Fuel Oil Non-Availability Report (FONAR).
8. However, a FONAR is not an easy way to avoid compliance and ships must provide evidence that they attempted to obtain compliant fuel oil, as their voyage plan stated, but the fuel was not available.
9. In addition, they must prove that attempts were also made to find an alternative source for such fuel oil.

10. A copy of the FONAR should be submitted to the Flag State and related Port State as soon as it is determined that compliant fuel oil will not be available.
11. The regulations are clear and there will be penalties if ships are caught carrying non-compliant fuel.
12. No relief will be given, unless there is an absolute case that the Master could not get compliant fuel or that, by doing so it would endanger the ship.
13. Enforcement of the new sulphur content requirements will primarily be through Port State Control (PSC) inspections.
14. An initial inspection would include checking documents such as the IAPP certificate, record books, bunker delivery notes (BDNs), FONARS, fuel changeover procedures and the ship implementation plan (SIP).
15. If there are clear grounds, then the Port State Control Officer (PSCO) may conduct a more detailed inspection, including onboard sampling, or an analysis of the MARPOL delivered sample.
16. For ships fitted with scrubbers, the PSCO may check that the system is working and operated, using the approved documentation.
17. [Recognised Organisations \(ROs\)](#) authorized under MARPOL are listed on the ADOMS website

Issued by

Antigua and Barbuda
Department of Marine Services and Merchant Shipping
(ADOMS) St. John's