

1. Overview

The Isle of Man Ship Registry wishes to advise clients that from 1st January 2020, MARPOL Annex VI requires all fuel used on board ships to have a sulphur content not exceeding 0.5% m/m unless the ship has an equivalent means of compliance. Within Emission Control Areas (ECAs) the limit remains unchanged at 0.1% m/m sulphur content.

In addition to this, it is prohibited to carry fuel oil with a sulphur content exceeding 0.5% m/m after 1 March 2020 unless an equivalent means of compliance is fitted to the ship.

2. Equivalent Means of Compliance

The Isle of Man is able to accept Exhaust Gas Cleaning Systems (EGCS) as an equivalence under MARPOL Annex VI Regulation 4.1 provided that they are approved by a Recognised Organisation in accordance with the IMO guidelines within MEPC.259(68).

Operators using EGCS should be aware of local regulations which may restrict discharge of washwater within certain areas.

3. Non-Availability of Compliant Fuel

It remains unclear whether there will be sufficient supply of compliant fuel in all ports. If there is not, Annex VI does not require ships to deviate from their intended voyage or to delay their voyage to achieve compliance. Where the only option is to bunker non-compliant fuel, a Fuel non-Availability Report (FONAR) should be submitted to the Isle of Man Ship Registry (who will submit this to IMO) and to the ship's destination port. The standard format for a FONAR, and associated guidance, can be found within [MEPC.320\(74\)](#).

It should also be noted that, if a ship arrives in a port with non-compliant fuel due non-availability of compliant fuel, a port state may request a record of the actions taken to attempt to achieve compliance and evidence that the ship attempted to purchase compliant fuel, so detailed records must be kept in this regard.

4. Ship Implementation Plan

IMO has published a template Ship Implementation Plan for Achieving Compliance with the Sulphur Limit and associated guidance within MEPC.1/Circ.878. Although this is not mandatory, operators should consider the usefulness of completing such a plan, particularly where difficulties are anticipated.

Please note - The Isle of Man Ship Registry cannot give legal advice. Where this document provides guidance on the law it should not be regarded as definitive. The way the law applies to any particular case can vary according to circumstances - for example, from vessel to vessel. You should consider seeking independent legal advice if you are unsure of your own legal position.

