



25 JANUARY 2025

Implementation of Mediterranean Sea Emission Control Area (ECA) Regulations

Applicable to: This FLEET SAFETY LETTER should be brought to the attention of ship-owners, ship managers, operators, Masters of Vanuatu-registered ships and Recognized Organizations

We hereby inform you that, effective 1 May 2025, the Mediterranean Sea will officially become an Emission Control Area (ECA) under MARPOL Annex VI. This regulation requires vessels operating within this area to utilize fuel oil with a sulphur content not exceeding 0.10% m/m.

This change follows the adoption of Resolution MEPC.361(79), which amends MARPOL Annex VI to include the Mediterranean Sea as an ECA. These regulations aim to reduce sulphur oxide (SOx) and particulate matter emissions to safeguard air quality and protect the marine environment.

Key Requirements for Compliance

1. Fuel Oil Changeover Procedures:

Vessels using separate fuel oils to comply with MARPOL Annex VI Regulation 14 must carry a written procedure outlining how the fuel oil changeover will be conducted.

The procedure must ensure sufficient time for the fuel oil system to be fully flushed of non-compliant fuel (sulphur content > 0.10% m/m) prior to entering the Mediterranean ECA.

The following records must be logged as required:

- The volume of low-sulphur fuel oil in each tank.
- The date, time, and position of the vessel when fuel oil changeover is:
- Completed prior to entering the ECA.
- Commenced after exiting the ECA.

2. Port State Control (PSC) Inspections:

PSC officers will inspect vessels to verify compliance. This includes:

- Ensuring the master and crew are familiar with and have implemented necessary fuel oil changeover procedures.
- Reviewing logbook entries for fuel oil changeover as required under MARPOL Annex VI.
- Checking Fuel Oil Delivery Notes (BDNs) and onboard records to confirm compliance with the sulphur limit ($\leq 0.10\%$ m/m).
- Conducting initial inspections, either within the ECA or at the first port after exiting the ECA, to ensure: Evidence of compliant fuel oil delivery and usage.
- Records of bunkering operations and compliance as per MARPOL Annex VI Regulation 18.5.
- If clear grounds for non-compliance are identified, detailed inspections may be carried out, including verifying familiarity with the changeover procedures.

3. Fuel Oil Non-Availability Report (FONAR):

In cases where compliant fuel oil is unavailable, vessels must submit a Fuel Oil Non-Availability Report (FONAR). Key points include:

- The FONAR is not an exemption but serves as evidence of efforts made to obtain compliant fuel oil.
- The report must include evidence detailing the vessel's attempts to procure compliant fuel from both local and alternative sources.

The vessel must notify:

- Its Administration.
 - The competent authority of the destination port.
 - The IMO, via the competent authority, about the non-availability of compliant fuel oil.
- The competent authority will assess the FONAR and determine further actions.

4. Additional Notes on Compliance:


Logbook entries, electronic record books, and BDNs must be maintained meticulously to demonstrate compliance. Masters and crew must be trained and familiarized with fuel oil changeover procedures and associated MARPOL Annex VI requirements.

Related Information Materials The following documents provide additional guidance:

- Resolution MEPC.361(79): Mediterranean Sea ECA for Sulphur Oxides and Particulate Matter.
- Resolution MEPC.305(73): Prohibition on the carriage of non-compliant fuel oil.
- Resolution A.1185(33): 2023 Procedures for Port State Control.
- Resolution MEPC.320(74): Guidelines for consistent implementation of the sulphur limit.

Shipowners and operators are strongly urged to implement these measures promptly. Compliance with the new Mediterranean ECA regulations is mandatory and subject to verification by PSC inspections. Non-compliance may result in detention, fines, or other penalties.

For any questions or clarifications regarding these requirements, please contact info@register-vu.com


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