



# ESSF Sub Group Implementation – Report to Plenary

Timothy Wilson



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# The Implementation SG -Objectives

**Facilitate MSs and the shipping community** in the overall preparation needed to ensure enforcement of, and compliance to, the revised sulphur Directive 2012/33/EU.

Establishing a **technical basis for a EU harmonised approach** to sampling and reporting – which is practical, proportionate and cost effective.

**Assist the Commission** in developing **Implementing Acts**, fixing EU binding rules on sampling strategies and reporting; all to be adopted by end 2014.

**Ensure coherence and synergies with the work of other Sub-groups** under ESSF, and at international level to advise and inform the ESSF on viable solutions.

**To address and integrate** the current and diverse implementation strategies of individual MSs.

To ensure a **cost effective implementation** of the provision of the Sulphur Directive to achieve the environmental objectives and ensure the sustainability of the shipping market.

# The SG work has formed Working Packages to cover key issues raised

The **three plenary papers cover** the areas that have been central to discussions in the two SG meetings of December '13 and March '14. These are:

1. **Sampling Methods** –developing guidelines for on board sampling and inspection
2. **Sampling Frequency** –a risk based targeting approach under discussion
3. **Reporting obligations of the MSs** - consensus for a uniform reporting format.

Remaining Work Packages include:

- **Emissions monitoring tools** - remote sensing technologies and novel methods of sampling
- **Transition** - safety implications & timing required for changing from HFO to MGO
- **Scrubbers** being used in ports, which have raised uncertainties as to what the present status of local controls are in Europe -A WP has been set up (led by NL) to enquire of the MSs.

## Sampling Methods- Article 6.1

SG has been reviewing the most pragmatic, safe and cost effective approach.

*Member States shall take all necessary measures to check by sampling that the sulphur content of fuels used complies with Articles 3\*, 3a\*\*, 4\*\*\*, 4a\*\* and 4b\*\*. ....The sampling .....shall be carried out in such a way that samples are **representative** of the fuel examined.....*

This Includes:

Sampling of fuel marine fuel ..... On delivery [as per IMO guidelines MEPC 182(59)]

Sampling and analysis of the sulphur content of marine fuel for on-board combustion **(No Guide !)**

Supported by review of documentation such as: log books / BDN's/ change over records etc....

**Some MSs are already drawing samples from engine fuel service systems** finding this to be the most definitive and practical way to determine compliance of fuel for combustion.

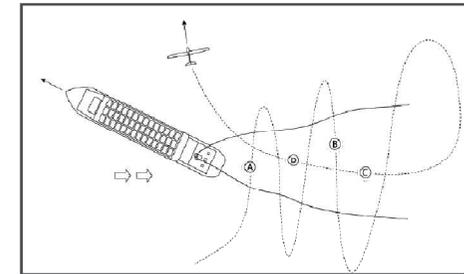
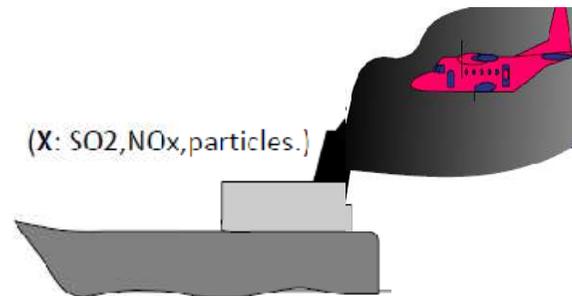
**The SG recommends** the plenary support the continued development of the 'On-board Sampling' Guide being proposed - the key elements being: **designated sampling points / staged inspection / sample analysis protocol / analysis interpretation.....**

## Two further areas being discussed

- SG seeks incentives for the MSs and shipping community **to pursue novel ways / technologies** that can reduce the inspection and reporting obligations for demonstrating :

*remote sensing under trial by Germany, Finland, Sweden, Denmark*

*Using the AIS to record fuel type and track fuel temperatures entering the engine reflecting whether HFO or MGO is in use.....*



- The SG recommends the MSs provide a notice to all owners/operators of ships intending to operate in and visit an ECA-SO<sub>x</sub> their responsibilities to ensure:

**Transition plans** are in well place that will ensure ships are compliant from 01 January 2015.

**Crews are competent** in applying the switch over from HFO to MGO safely, being aware of the potential operational and technical risks. *(Thanks for the input from VDR , RBSA and a number of ship operators in highlighting the safety concerns)*

# Recommendations

Time is short with 01 January 2015 only 6 months away and we will be ready!

We recommend for the plenary to support the continued efforts of the SG which has highlighted the issues and continues to work on the solutions.

It is the SG's priority to deliver in a timely manner the 'guidelines' which will:

- provide the technical basis needed for the adoption, by the Commission and the Member States, of the Implementation rules in a pragmatic and cost effective timely manner
- reinforce the EU compliance culture aligning with the IMO initiatives.
- **facilitate MSs and the overall shipping community's** preparation for the monitoring of compliance and enforcement of the 2012/33/EU sulphur standards in the EU.

Timothy Wilson CEng CMarEng MIMarEST  
Principal Specialist Engineer  
Marine Consultancy FOBAS  
Fuels, Lube and Emissions  
T +44 (0)2380 249641 E [timothy.wilson@lr.org](mailto:timothy.wilson@lr.org)

Lloyd's Register EMEA  
Mountbatten House, Southampton, SO15 2JU



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