

ISTANBUL & MARMARA, AEGEAN, MEDITERRANEAN, BLACK SEA REGIONS
CHAMBER OF SHIPPING

Our reference: 4677

Subject: About Sulfur Scheme for Marine Fuels

Circular No: 647/2011

- Ref. (a) "Regulation on Reduction of Sulfur Content of Some Fuel Types" published by the Ministry of Environment and Forestry in the Official Gazette no. 27368 of 06.10.2009
(b) "Regulation Amending the Regulation on Reduction of Sulfur Content of Some Fuel Types" published by the Ministry of Environment and Forestry in the Official Gazette no. 27449 of 31.12.2009 (4th re-publication)
(c) Letter from the General Directorate for Maritime Transport of the Undersecretariat for Maritime Affairs of the Ministry of Transport, Maritime and Communications no. 34438 of 07.12.2011

Please kindly find enclosed for your information the letter referred to in (c) above covering that:
The regulation referred to in (b) as amended by the regulation referred to in (a) above provides that those maritime fuels having a sulfur content exceeding 0.1% by mass may not be used in inland water crafts and ships at the quay within the marine jurisdiction of our country as from 1 January 2012;

Those ships which transit Turkish Straits are not subject to the provision for use of maritime fuels having a sulfur content not exceeding 0.1% by mass as long as they keep their transit navigation;

Those ships flying Turkish Flag may not use maritime fuels having a sulfur content exceeding 1.5% through SOx Emissions Control Areas as referred to in the regulation, but currently there is no SOx Emissions Control Area in our country;

All passenger ships operating regular service under a line permission as issued by Maritime Administration are required to use maritime fuels having a sulfur content not exceeding 1.5% by mass;

Compliance with these provisions shall be inspected by Maritime Administration and relevant provisions of the Law on Environment no. 2872 shall apply in case of any non-compliance.

Best regards.

Murat TUNCER
Secretary General

ENCLOSURE:

Encl. 1: Letter referred to in (c) above (2 pages)

CC:

For action:

All members (on the website)
Turkish Union of Shipowners
Limited Liability Motor Vehicle Cooperative of Ship-owners
Committee

Maritime Association of Ship-owners and Agents
TURKLIM

IMEAK DTO 14, 16, 17, 18, 19, 20, 21, 22, 23,
24, 25, 26, 27, 29, 30, 31, 32, 33, 36, 44, 45, 46

Chairmanship of Professional Committee no. 47

Bunker Suppliers' Association

Limited Liability Tankship Fuel Transporters' Cooperative

For information:

Chairman and Members of Board of
Directors

IMEAK DTO Environment

IMEAK DTO Branch Offices

All Agents

REPUBLIC OF TURKEY
MINISTRY OF TRANSPORT, MARITIME AND COMMUNICATIONS
Undersecretariat for Maritime Affairs
General Directorate for Maritime Transport

No: B.02.01.DNM/0.06.14.01.143.01/34438

07/12/2011

Subject: Sulfur Scheme for Marine Fuels

IMEAK CHAMBER OF SHIPPING
ISTANBUL

- Ref. a) "Regulation on Reduction of Sulfur Content of Some Fuel Types" published by the Ministry of Environment and Forestry in the Official Gazette no. 27368 of 06 October 2009
b) "Regulation Amending the Regulation on Reduction of Sulfur Content of Some Fuel Types" published by the Ministry of Environment and Forestry in the Official Gazette no. 27449 of 31 December 2009
(c) Our letter no. 25963 of 07.09.2011
(d) Letter from Lloyd's Register no. 2301/EY/es/347 of 11.11.2011

Detailed information has been requested by the letter referred to in (d) above on some matters covered by our letter referred to in (c) above.

As can be understood from relevant articles of the regulation referred to in (a) above as amended by the regulation referred to in (b) above, as from 01 January 2012, the requirement for use of maritime fuels having a sulfur content not exceeding 0.1% by mass applies to "inland water crafts" and "ships at quay". The definition of "inland water" in this regulation covers "natural and artificial lakes, dam lakes, fishponds and rivers", and the "inland water craft" means "any and all boats intended for transport of commodities and passengers and fishery boats". The term "ships at quay" means the ships which are safely moored or anchored within the borders of any port during loading, unloading or accommodation or during the times of no load operation. Therefore, as from 01 January 2012, all boats and fishery boats sailing in inland waterways as well as all boats moored or anchored within the port borders are required to use maritime fuel having a sulfur content not exceeding 0.1%. In this context, the regulation provides that "the ships shall complete fuel exchange operations as soon as possible following arrival at the port and as late as possible before they leave the port".

As can be understood from Article 2 "Scope" of the regulation, the provisions of the regulation shall apply within "the marine jurisdictions or designated pollution control areas". As also can be understood from this article of the regulation, "the fuels used in war ships and military purpose ships" are not covered by the regulation. The ships that arrived at Turkish ports as well as those which are anchored in anchorage zone are subject to the requirement for use of maritime fuel having a sulfur content not exceeding 0.1% by mass as long as they are safely moored or anchored during loading, unloading or accommodation or during the times of no load operation except for incases specified in paragraph 2 of Article 7 of said regulation. In this context, the obligation for the ships at quay to use maritime fuel having a sulfur content not exceeding 0.1% by mass does not apply if such ships stay moored or anchored at the port for during a period not exceeding two hours according to the published tariff.

However, those ships which transit Turkish Straits are not subject to the provision for use of maritime fuels having a sulfur content not exceeding 0.1% by mass as long as they keep their transit navigation.

All passenger ships operating regular service under a line permission as issued by our administration are required to use maritime fuels having a sulfur content not exceeding 1.5% by mass. The regulation further provides the definitions of “regular service” and “passenger ship”, and any passenger ship operating regular service under a line permission as issued by our administration is required to shift to said maritime fuel before entering marine jurisdictions or designated pollution control areas and use said fuel in such areas.

These provisions apply to maritime fuels, and considered to apply to all maritime fuels without discrimination among fuels used in main machinery, auxiliary machinery, boiler or other machinery.

Although provided for in the regulation, there is no SOx emissions control area in our country currently. Necessary statistical and measuring activities should be made to establish risk and damage analyses in order to declare such an area. Our projects are in progress for completing and evaluate the results of these studies to cover primarily Turkish Straits and Marmara Sea and then all marine jurisdictions on institution basis. These projects are at evaluation stage, and a final decision may only be taken whether such an area could be designated based on the project outputs upon commencement and completion of these projects.

Pursuant to said provisions, the bunker delivery reports and ship journals shall be inspected to check whether the fuel exchange operations of the ships have been performed properly. In addition, the samples delivered to the ship during bunker delivery and the fuel contained in the tank as declared by the ship to contain the fuel in compliance with these provisions shall be sampled and sent for analysis. Relevant provisions of the Law on Environment no. 2872 shall apply in case of any nonconformity.

(Signature)
Özkan PYRAZ, PhD
Genral Director
f. Minister

CC

For action

Lloyd’s Register
IMEAK Chamber of Shipping
Mersin Chamber of Shipping

For information:

Ministry of Environment and Forestry
(General Directorate for Environmental Management)