

Loss Prevention 29 Feb, 2024

## Fines for improper use of onboard Exhaust Gas Cleaning Systems (EGCS)



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**The Club has been made aware of cases where vessels were fined by local authorities for improper use of onboard Exhaust Gas Cleaning Systems (EGCS).**

EGCS – also called the exhaust gas scrubber - is one of the alternative methods of compliance with MARPOL Annex VI regulations. However, it is a timely reminder to the members that many countries and individual ports have banned the discharge of wash water from the use of EGCS in open-loop mode in certain waters. When the prohibiting measure is national, then the restriction applies to inland and territorial waters as well as to the national ports. However, in other instances, the restriction can be implemented at a port level and would apply to anchorages and berths only. The ships may be allowed to switch EGCS to the closed-loop mode or have to use a fuel compliant with relevant requirements. In rare cases, use of a closed-loop scrubber is also banned, and in others, so-called “bleed-off water” discharge from closed-loop scrubbers may be banned explicitly. However, this kind of ship discharges may fall under the definition of contaminated waters and will be prohibited from being dumped overboard along with other illegal discharges.



Liability for fines imposed on a vessel may not always be covered if the discharge of hazardous substances from the vessel is not considered accidental.

Given that the requirements on the use of EGCS differ from authority to authority and are subject to change, we recommend that shipowners always clarify with ship agents or local P&I correspondents before calling unfamiliar ports.