



SHIP SAFETY BULLETIN

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**Subject: Regulations for Vessel Air Emissions:
Sulphur in Fuel Content Verification Process**

Purpose

This bulletin informs stakeholders that Marine Safety Inspectors will start verifying compliance with the 0.1% sulphur content requirements for marine fuel through on-site fuel sampling and testing effective **August 22, 2016**.

Background

The *Vessel Pollution and Dangerous Chemicals Regulations* (the Regulations) set out provisions to implement the North American Emission Control Area (NA-ECA) adopted under Annex VI to the *International Convention for the Prevention of Pollution from Ships* (MARPOL)

Since January 1, 2015, the sulphur content of marine fuel used on board a vessel must not exceed 0.10% by mass within the Canadian jurisdiction of the NA-ECA, as set out in Section 111 of the Regulations. The NA-ECA standard should provide important benefits to Canada. It is expected to result in a more than 90% decline in sulphur oxide emissions from vessels.

Since most vessels must use more expensive low sulphur fuel oil to comply with these standards compared to vessels operating outside of ECAs under MARPOL, Transport Canada will rigorously monitor vessels to ensure they are complying with the NA-ECA standards.

Transport Canada will use portable fuel analyzers onboard vessels to measure the sulphur content of its fuel oil to verify compliance with the NA-ECA standard. Test results will help inspectors make informed decisions on the next enforcement steps during the course of the inspection.

Keywords:

1. Air Emissions
2. Marine Fuels
3. Regulations
4. Sulphur
5. Pollution Prevention

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Scope

- The process applies to all vessels operating in waters under Canadian jurisdiction that are using petroleum-based fuel oils, either residual or refined products.
- This process does not apply to a vessel that is:
 - using a sulphur emission control system or an alternative to petroleum-based fuels;
 - a foreign vessel powered by a propulsion boiler that was not originally designed for continued operation on marine distillate fuel or natural gas;
 - a Canadian vessel:
 - under a fleet averaging program as set out in Section 111.1 of the Regulations; or
 - exempted from Section 111 of the Regulations by a decision of the Marine Technical Review Board (MTRB); or
 - a vessel operating under a waiver issued under Regulation 3 or 4 of Annex VI to MARPOL.

Fuel Sulphur Content Verification

During an inspection of a vessel, a Marine Safety Inspector may require a sample of fuel from the engine's fuel system and perform an analysis of the fuel sample using a fuel analyzer.

Depending on the results of the analysis, the inspector may also forward the samples to an accredited laboratory to confirm compliance with the fuel oil sulphur content requirements. If the analyzer is not available, the inspector may forward the fuel sample directly to the laboratory for analysis.

The vessel's authorized representative will be informed of the analytical results. In addition, Transport Canada will share the results with industry stakeholders, other maritime administrations and the International Maritime Organization, but will make data on individual ships anonymous.