

## Expert thinking on critical issues

**SAFETY4SEA**, in association with the **North of England P&I Club**, discusses topical industry issues.

**Q:** “To date, has enforcement of the IMO global fuel sulphur cap been successful?”



**George Teriakidis**  
Area Manager,  
East Mediterranean  
& Black Sea, DNV GL Hellas S.A.

**Yes.** Despite all the concerns and the challenging task of preparing the entire fleet for an almost simultaneous fuel switch, the transition has been smooth. There have been indeed reported increased cases of quality problems with fuels, as well as machinery issues that are related to fuel quality as well as scrubber failures. Except only a handful of serious cases, there have not been major disruptions due to fuel availability or any major safety incidents. This can be attributed to good preparation of vessels, crew training and engagement by all stakeholders when problems occurred. Overall, the shipping industry has successfully managed this challenging transition, although certain minor issues still remain.



**Mark Smith**  
Loss Prevention Executive,  
The North of England P&I Club

**No.** PSC may not have visited as many vessels as expected after IMO 2020 because of the global pandemic. Inspections and fuel oil sampling can't be carried out behind a computer screen so have we really seen the levels of enforcement we expected? I doubt it. If owner's fuel test analysis returns 0.54% s content or above, it's clear cut! Test methods have limitations with regards to their accuracy and a single test result of 0.53% sulphur does not conclusively prove that a fuel has failed to meet the 0.50% sulphur limit. The amended procedure recognizes single test reproducibility and allows a test margin of up to 0.53% sulphur. The aim of IMO 2020 enforcement should be to penalize ship-owners and charterers who are not making any effort to comply.



**Bill Stamatopoulos**  
Business Development Manager South  
Europe,  
Bureau Veritas

**Yes,** the enforcement of the global fuel sulphur cap has been successful. The guidance issued by IMO and other stakeholders so as to explain the rationale of this change and to enhance preparedness was very effective. This new era marked a significant milestone to improve air quality, preserve the environment and protect human health. Ship operators and fuel suppliers have adapted either by the use of VLSFO or by the use of exhaust gas cleaning systems. Monitoring compliance and enforcing the new limit, falls under the remit of Governments and national authorities of Member States that are Parties to MARPOL Annex VI. Flag and PSC are ensuring that ships are compliant via document checks, fuel samples, targeting mechanisms, remote sensing and use of sniffers.



**Dr. Edmund Hughes**  
Director,  
Green Marine Associates Ltd.

**Maybe.** It is difficult to assess whether enforcement of the 0.50% global sulphur limit has been successful due to the impact of the COVID-19 pandemic which has affected global trade with a knock-on effect of depressing shipping activity. As a consequence, global bunker fuel oil demand has been impacted leading to a significant narrowing of the price spread between HFO and VLSFO so providing less of an economic incentive for ship operators to not comply. Furthermore, with the carriage ban of non-compliant fuel oil only coming into force on 1 March 2020, COVID-19 has limited the scope of enforcement action by PSC authorities thus potentially reducing insight into the rate of compliance and the scale of any non-compliance.



**Charalampos Giantzikis**  
Technical Manager,  
Arcadia Shipmanagement Co Ltd

**Yes**, we can say that the IMO global sulphur cap has been successful. We read that IMO had only 55 reported cases of non-availability, globally and had no reports of safety issues linked to compliant fuel. Regarding violations because of the Covid-19 pandemic, PSC inspections for compliance were very limited. From the operators' side, fuel analysis shows sulphur content values being between 0.50 and 0.53, while same is 0.50% or lower on the BDN. Main issues are still stability and storage and there are cases of sludging and filter clogging. Last but not least cylinder lubrication presents a challenge to the operators, since they have to decide themselves on issues like TBN and piston ring composition.



**Panos Kourkountis**  
Technical Director, Sea  
Traders SA

**Yes**. In 2019 the preparations for the enforcement of the 2020 fuel cap were overwhelmed by the uncertainties regarding the availability of compliant fuel, the price difference between new and old fuels and the quality issues of the new fuels. Many companies decided to tackle the uncertainties by installing scrubbers on their ships. The gap between the cost of high and low Sulphur was reduced within the first 2-3 months of 2020 and the price difference does not justify investment in scrubbers. Poor quality fuels have plagued the shipping industry for quit a long time. Issues of compatibility and stability and the matching of fuels with lubricants were added to the existing problems but the matter seems to be under control.



**Fotis N. Dalmyras**  
Technical Director,  
Andriaki Shipping Co. Ltd.

**Yes**, generally we can say that the transition to Very Low Sulphur Fuels (VLSFO) has been successful. Andriaki was among the Tanker Operators that selected not to install SOx Scrubbers, but changed over to VLSFOs. This required significant preparatory work and good planning, so as to minimise HFO inventories by the end of 2019 and to accommodate the VLSFO in as clean storage tanks as possible. However, operation with VLSFOs has not been trouble free. Problems related to fuel injection systems and pistons/liners wear have been experienced. Continuous monitoring, adoption of Engines manufacturers' recommendations and correct selection of appropriate lubricants and feed rates are prerequisites for reduction of operational problems and downtime.



**Søren Høll**  
CEO,  
KPI OceanConnect

**Yes**. When IMO 2020 first entered into force, there were concerns that there wouldn't be enough compliant fuels to meet both land and maritime demand. But the reality is that there were only 55 FONARs filed to the IMO in 2020. And, perhaps more significantly, it has not received any reports of safety issues linked to VLSFO since the rules came into effect. The bigger concern for operators in the last 18 months has been inadvertent non-compliance; and we have worked to ensure that any bunkers we deliver meet the standards of ISO 8217 and PSC. Any bunker partner that doesn't appreciate the risks of marginally off-spec fuels is taking a big gamble with their customers' balance sheets and reputations.



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