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Subject : **Kükürt Düzenlemelerinin Armatörler Üzerindeki Etkileri Hk.**

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Sayın Üyemiz,

İlgi: 12.02.2015 tarihinde Lloyd's List gazetesinde yayınlanan bir yazı.

İlgi yazıda, armatörlerin ve diğer denizcilik endüstrisi aktörlerinin en yeni kükürt emisyonu kurallarını nasıl algıladıklarını –ya da bu kurallardan nasıl etkilendiklerini- saptamak amacıyla, Lloyd's List tarafından üçüncü yıllık kükürt anketinin başlatılmak üzere olduğu bildirilmektedir. Bir sonraki kükürt kuralı değişikliğinin önümüzdeki beş yıl içerisinde yapılacağı ve yakıt arzı konusundaki belirsizliklerin sürmekte olduğu göz önüne alındığında, armatörlerin geleceğe ilişkin düşünceleri de ankette yer alacaktır.

Kükürt düzenlemelerinin armatörler üzerindeki etkilerini ele alan ilgi yazının Odamızda yapılan Türkçe özet çevirisi ilişikte sunulmuştur (Ek-1).

Bilgilerinizi arz ve rica ederiz.

Saygılarımızla,

MURAT TUNCER
Genel Sekreter**EKLER:**

Ek-1: İlgi yazının Türkçe çevirisi

Ek-2: İlgi yazı

DAĞITIM:**Gereği:**

- Tüm Üyelerimiz (Web Sayfasında)
- Türk Armatörler Birliği
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- Vapur Donatanları ve Acenteleri Derneği
- İMEAK DTO Çevre Komisyonu
- 13,15,16,17,18,19,20,21,22,23,24,25,27,28, 29,30,47 No.'lu Meslek Komitesi Bşk.
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- İMEAK DTO Şubeleri
- Türk Uzakyol Gemi Kaptanları Derneği
- Gemi Sahibi Firmalar

Bilgi:

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Kükürt Düzenlemeleri Armatörler İçin Bir Sorun Olmaya Devam Ediyor

Lloyd's List, armatörlerin ve diğer denizcilik endüstrisi aktörlerinin en yeni kükürt emisyonu kurallarını nasıl algıladıklarını –ya da bu kurallardan nasıl etkilendiklerini- saptamak amacıyla üçüncü yıllık kükürt anketini başlatmak üzeredir.

Bir sonraki kükürt kuralı değişikliğinin önümüzdeki beş yıl içerisinde yapılacağı ve yakıt arzı konusundaki belirsizliklerin sürmekte olduğu göz önüne alındığında, armatörler geleceğe ilişkin düşüncelerini de ankette belirteceklerdir.

Petrol fiyatlarında en son meydana gelen ani düşüş, kükürt emisyonu kurallarının deniz taşımacılığında doğurması beklenen sert sonuçları hafifletmiş olsa da armatörleri etkileyen temel meseleler varlığını sürdürmeye devam etmektedir.

2015 yılının ilk ayları itibariyle, emisyon kontrol bölgelerinde (Emission Control Areas – ECAs) faaliyet gösteren gemiler, önceden kullandıkları ağır yakıtlardan daha pahalı olan damıtık (distillate) yakıtları kullanmak zorunda kalmışlardır.

Yani gemilere bir egzoz gazı temizleme sistemi tesis edilmedikçe; bugüne kadar birçok gemi için durum böyle değildir. Gaz temizleyicilerin (scrubbers) hala pahalı olmasının yanı sıra, limanda kullanımları hakkında gene de bazı sorunlarla karşılaşmaktadırlar, bunlar daha yüksek kükürt içeriği olan daha ucuz yakıtların kullanımının devam etmesini kolaylaştırmaktadır.

Kükürt kuralları gereğince, kükürt ECA'ları içerisinde bir geminin kullandığı yakıtın % 0.1'den daha düşük kükürt içeriğine sahip olması gerekmektedir. Anılan kurallar 2008 yılında bir uluslararası konferansta kabul edilmiş ve Uluslararası Denizcilik Örgütü'nün (International Maritime Organization – IMO) deniz kirliliği kurallarında değişiklik yapılmasına neden olmuştur.

Bunu takiben Avrupa Birliği, iki önemli farklılık olsa da yakıtın kükürt içeriği ile ilgili kurallarını uluslararası kurallarla uyumlu hale getirmek amacıyla değiştirmiştir. Birinci olarak, yakıt arzı hakkında yakında piyasaya sunulacak olan ve belki de ECA dışındaki alanlarda en yüksek kükürt oranı uygulamasının 1 Ocak 2016 tarihine ertelenmesi tavsiyesinde bulunabilecek bir uluslararası çalışmanın sonuçlarına rağmen, ECA dışındaki bölgelerde en yüksek oran % 3.5'ten % 0.5'e düşürülmüştür. İkinci farklılık ise, ECA dışındaki Avrupa sularında faaliyet gösteren yolcu gemilerinin 2020 yılına kadar % 1.5 ya da daha düşük kükürt içeren yakıt kullanmalarının gerekmesidir.

IMO'nun kuralları duyurmasından altı buçuk sene sonra kuralların yürürlüğe girmesiyle birlikte, öncekinden daha fazla korku ve endişe duyulmaktadır.

Armatörler IMO'nun kararından iki yıl sonra, işletme masraflarının aşırı yükselmesi anlamına gelebilecek bir sorunla karşı karşıya olduklarını fark etmişlerdir. Söz konusu sorunla baş edebilmenin tek yolu, örneğin yüksek navlun ücretleri veya bilet fiyatlarıyla bu masrafların müşterilere aktarılmasıdır.

Bunun mümkün olmadığı yerlerde ise, yük sahiplerinin deniz taşımacılığı yerine karayolu ve demiryolu taşımacılığını daha çok tercih etmeleri ya da işletmecilerin rotalarını kapatmaları korkusuydu. Örneğin, yalnızca bir ECA'da faaliyet gösteren gemilere sahip kısa mesafeli deniz taşımacılığı yapan iki işletme olan DFDS ve Transfennica rotaları kapatarak faaliyetlerine son vermiştir.

Ham petrol fiyatlarındaki düşüş, yakıt fiyatlarında bir azalma olmasına yol açmış; fakat akaryakıt ve dizel yakıtlar arasındaki büyük fiyat farkı bir kükürt sürşarjının başlamasına sebep olmuştur.

LNG, operasyonel maliyetlerin düşürülmesinde giderek gelişen bir çözümdür. LNG dizel yakıtlardan daha ucuzdur ve kükürt içermeyen yakıtın kullanımında gerekli olan teknoloji masraflı iken işletme maliyetleri daha düşüktür. Bu durum, özellikle de kısa mesafeli deniz taşımacılığı veya tahsis edilmiş rota işletmeleri için yeni inşa gemiler sipariş eden bazı armatörler için cazip bir seçenektir.

Şimdiki halde yeni ikilemler bulunmaktadır. Birincisi kuralların nasıl yürürlüğe gireceği sorunudur. Tüm IMO kuralları bayrak ve liman devleti denetimleri yoluyla uygulanmaktadır. Bazı bayrak idarelerinin kükürt kurallarını çok sert şekilde uygulayacaklarına ilişkin ciddi endişeler bulunmaktadır. Ayrıca, verilebilecek cezanın seviyesi veya mürettebatın kükürt kurallarını bilerek ihlal etmeleri durumunda bir geminin ne kadar süre tutulacağına dair sorular bulunmaktadır. Armatörler, yakıt kalitesi hakkında da endişelidir. Mürettebat sıklıkla, yakıt tedarikçilerinin bilhassa kükürt içeriği olmak üzere yakıt hakkında verdikleri bilgilere güvenmek zorundadırlar. Bunlara ilaveten, egemenlik meselesi de bir sorun olarak karşımıza çıkmaktadır. Armatörler, köprü üstündeki ve liman girişlerindeki insansız hava aracına ve emisyon algılayan detektörlere rağmen, cezaların çok düşük olacağına inanmaktadırlar. Bu bir ölçüde ülkelerin, diğer karasularında meydana gelen kural ihlallerine karşı harekete geçmelerini sağlayacak yargı hakkına ülkelerin sahip olmaması nedeniyledir.

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Çeviren: Selin YELESER

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How are sulphur emission regulations impacting the shipping industry?
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Sulphur regulations remain a headache for owners

Thursday 12 February 2015, 13:20 by Craig Eason

REGULATION 

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The fundamental issues of sulphur emission rules impacting shipowners still remain. [Jordi C/Shutterstock.com](#)

From route closures to issues surrounding compliance and engine performance, the arrival of new sulphur emission regulations at the start of the year has been anything but simple

LLOYD'S List is about to launch its third annual sulphur survey to determine how shipowners and other industry players have perceived — or been impacted by — the recent sulphur emission regulations.

Owners will also provide their thoughts about the future, given that the next sulphur rule change is in five years' time and there are still questions about fuel

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availability.

The results of the 2014 survey can be found here.

The recent and sudden drop in fuel prices has taken the edge off the predicted dominant impact of sulphur emission rules on the shipping industry, but the fundamental issues impacting shipowners still remain.

For the past six weeks, vessels operating in emission control areas have had to use distillate fuels that are more expensive than the heavy fuel oils they were able to use previously.

That is unless vessels have an exhaust gas-cleaning system installed, which to date is not the case for many. While scrubbers are expensive and still face some issues about their use in ports, they enable cheaper

fuels that have higher sulphur content to continue to be used.

The sulphur rule in itself is simple. Fuel used by a ship inside designated sulphur ECAs must have less than 0.1% sulphur content. The rules were agreed at an international conference in 2008, becoming amendments to the International Maritime Organization's marine pollution rules.



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Subsequently the European Union amended its sulphur in fuel regulations to be aligned with the international ones, albeit with two key differences: the non-ECA cap will drop from 3.5% to 0.5%, regardless of the findings of an international study on fuel availability that is about to be launched and may lead to a recommendation for the non-ECA cap to be postponed to January 1, 2016; and passenger vessels operating in non-ECA European waters have to use a fuel of 1.5% sulphur content or lower until 2020.

With the rules now in force, six and a half years after the IMO first announced them, there is just as much consternation and concern as before.

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A couple of years after the IMO decision, shipowners began to realise they were facing a problem, as it would mean their operating costs could rocket. The only way to cope with this would be to pass this cost on to customers, for example through higher freight rates, or ticket prices.

Where this was not possible, there was the fear that cargo owners would use more road and rail transportation rather than sea transport, and operators may have to close down routes. DFDS and Transennica are two shortsea operators with vessels operating exclusively in an ECA that have closed off routes.

The drop in crude oil prices has led to a drop in fuel prices, but a large price differential between fuel oils and diesel oils is still present, which has led to the introduction of a sulphur surcharge.

This is different to a bunker adjustment factor and one bunker purchaser at an international shipowner pointed out that these two financial instruments appear in different aspects of operational accounts — one being a hedging strategy, the other an additional tariff on freight rates — so they should not be confused with each other.

Liquefied natural gas is, as most Lloyd's List subscribers know, a growing solution for reducing operational costs. LNG is cheaper than diesel fuels and while the technology to use the fuel, which has no sulphur content, is costly, the operating costs are lower. This makes it an attractive possibility for some shipowners, particularly those ordering newbuildings for shortsea or dedicated route operations.

Inspections

Now there are new dilemmas. First is the ongoing issue of how the regulations will be enforced. All IMO regulations are enforced through flag and port state inspections. There are serious questions about some flag authorities' interest in enforcing the sulphur rules too harshly, as clearly flags rely on being an attractive register for commercial tonnage, and there is the risk of deflagging.

The IMO's mandatory flag state audit scheme may help here, but as this is still being rolled out, it is too early to tell. There is the role of the classification society here to consider. Flag states increasingly use class societies as recognised organisations to undertake inspections on certain aspects of regulations on a flag state's behalf. This is a profitable point of pride for the class society.



Sulphur Survey 2015

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There has been a movement by the shipowner members of the Trident Alliance, who have signed up to a charter of compliance to the sulphur emission rules, saying they want robust enforcement regimes to make sure that deliberate rule-breakers are caught and dealt with in a way that will be a strong deterrent to others.

There may be problems in achieving this.

Port state inspectors visiting a ship in port have a long list of both paperwork and equipment that could and should be checked. There is a valid concern that inspectors will opt to inspect vessels where they know the job will be easy, namely newbuildings, where faults and breaches of the rules are less likely to occur and the paperwork will be minimal.

The European Union, through the European Maritime Safety Agency, has developed guidelines on how port state inspectors should go about checking for compliance: checking paperwork, log books and bunker delivery notes first, then turning to samples if needed.

There is also a requirement in the making for all European countries to inspect at least 10% of vessels calling at European ports for sulphur compliance, and then to have fuel sampled on a certain percentage of those vessels. The latter point will apply from January next year.

These are all welcome moves, but do not answer two burning questions that owners still have.

First of all, there is the level of fine, or how long vessels will be detained if crews are found to be deliberately breaking the sulphur rules. Shipowners are also concerned about fuel quality. Crews often have to trust the word of the bunker supplier regarding fuel characteristics, particularly sulphur content. Bunker suppliers in some parts of the world have been known to fabricate bunker delivery notes. The Trident Alliance wants port state inspectors to act against deliberate non-compliance of the rules, and not when fuel is only slightly over the threshold, an indication of accidental non-compliance.

Secondly, there is the issue of sovereignty. Shipowners have confided in Lloyd's List that despite the hype of aerial drones and emission-sensing detectors on bridges and at port entrances, they are concerned that fines will be too low. This is partly because countries do not have jurisdiction to act against breaches in regulations in other territorial waters.

Technology and maintenance

Shipowners with vessels operating in global trading patterns, and therefore entering and leaving the ECAs of northern Europe and North America, have already been given advice on how to ensure they safely switch between diesel and fuel oils to avoid blackouts, problems with valves and potential engine fires.

A few days ago, MAN Diesel and Turbo issued additional information to ship operators advising them on a few key issues on using low-sulphur fuels in two-stroke engines.

The advice qualifies the type of lube oil that should be used, and the condition of the fuel as it is being fed into the ships' engines, particularly two-stroke engines, which historically have been designed specifically to use fuel oils.

But the enginemaker says fuels of less than 0.1% can be used when appropriate actions are taken. The viscosity of the fuel should be kept above two centistokes at the point of entry into the engine, and when using a low-sulphur fuel, a lube oil of with a low base number should be used.

MAN Diesel and Turbo also says owners are advised to keep crew informed of the challenges, remove cat-fines from the fuel and monitor the consumption of the engine cylinder regularly.

A numbers game



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The BN of lube oil is a reference to the levels of an alkaline in the oil that can work to counteract the formation of acid due to the sulphur in fuel oils. A high BN number is needed with fuels of a high sulphur content and an even higher BN lube oil is recommended for long-stroke engines or engines running slowly, such as when slow steaming.

When the engine runs slowly, or has a long piston stroke, the fuel residue can sit on the cylinder wall for longer, leaving an acid residue, which can lead to what is known as cold corrosion.

Conversely, when lube oils with high BN numbers are used with a bunker fuel that has very low sulphur content, there is a build-up of calcium compounds that can create friction problems between piston and cylinder.

Lube oil makers are incredibly competitive, and there has been a war of words in some technical circles as these oil companies battle for market position.

There is one lube oil maker, Total Lubmarine, that has a range of products with different BN numbers, but has one oil, known as Talusia Universal, which it claims can work with nearly all sulphur percentages.

Total Lubmarine global marketing director Serge Dal-Farra says the company has been putting a lot of research and development capital into its products and meeting the challenges in the market.

While it will follow enginemakers' guidelines, Total is also investing in chemistry, taking another look at how the issue of acidity in the fuel-burning process can be tackled.

While it is not talking openly about the product, Lloyd's List believes it involves using new chemicals to react against the sulphur acid build-up in fuels.

Two-stroke engines also use a system oil, but not to the volume that cylinder oils are used. However, while lube oils are mixed with fuels during their use in an engine and therefore are part of the combustion process, system oils can be collected and reused.

If a shipowner is a customer of Lukoil, a Russian company that is one of the newest lube oil suppliers on the market, then that used system oil can be mixed with lube oil, in a unique piece of technology Lukoil has developed. This equipment, known as iCOLube, will mix the lube oil and service oil to produce a lubricant with the right BN for the engine and sulphur content of the fuel being used.

There are critics of the iCOLube system, but the concept has been accepted by a small handful of customers since its launch a little over a year ago, not least Mediterranean Shipping Company, which has installed the system in its 19,224 teu containership MSC Oscar and will be putting it on the other giant boxship newbuildings coming out of Daewoo Shipbuilding in South Korea.

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