



İstanbul :

Sayı:

Our Reference : 510

06.02.2019

Konu:

Subject : MARPOL EK-VI Kural 18'in Geliştirilmiş Uygulaması Hk.

SİRKÜLER No: 89 / 2019

İlgi: ICS (Uluslararası Deniz Ticaret Odası)'in 28.01.2019 tarihli ve MC(19)09 sayılı yazısı

Sayın Üyemiz,

İlgi yazı ile ICS Üyelerinden, Marshall Adaları Cumhuriyeti tarafından ICS Sekreteryası'na sunulan "MARPOL EK-VI Kural 18'in Daha İyi Uygulanması" başlıklı taslak önerisi hakkındaki görüş ve önerilerin gönderilmesi talep edilmektedir. Bahse konu taslak öneriler Ek'te üyelerimizin bilgisine sunulmuştur.

Bilgilerinizi arz/rica ederiz.

Saygılarımızla,

İsmet SALİHOĞLU
Genel Sekreter

EKLER:

Ek-1: İlgi yazı ve Eki özet Türkçe çevirisi (3 syf.)

Ek-2: İlgi yazı ve Eki (8 syf.)

DAĞITIM:

Gereği:

- Tüm Üyelerimiz (Web)
- Türk Armatörler Birliği
- S/S Gemi Armatörleri Motorlu Taş. Koop.
- Vapur Donatanları ve Acenteleri Derneği
- İMEAK DTO Meslek Komitesi Başkanları
- İMEAK DTO Şube ve Temsilcilikleri
- GİSBİR
- Yalova Altınova Tersane Girişimcileri San.ve Tic.A.Ş
- TÜRKLİM
- GESAD
- S.S. Deniz Tankerleri Akaryakıt Taş. Koop .
- Gemi Yakıt İkmalcileri Derneği
- Yetkilendirilmiş Klas Kuruluşları
- Gemi Sahibi Firmalar

Bilgi:

- Meclis Başkanlık Divanı
- Yönetim Kurulu Başkanı ve Üyeleri
- İMEAK DTO Çevre Komisyonu
- Meclis Üyeleri
- İMEAK DTO Şube Y/K Başkanları
- Gemi Makineleri İşletme Mühendisleri Odası
- Gemi Mühendisleri Odası
- WISTA Türkiye Derneği

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EK-1

28 Ocak 2019

(Serbest Çeviridir)

**MARPOL EK-VI KURAL 18'İN GELİŞTİRİLMİŞ UYGULAMASINDA
MEPC 74'E SUNULAN TASLAK ÖNERİLER**

Yapılması Gereken: Üyelerden, bu sirkülerde verilen bilgileri dikkate almaları ve Ek'te bulunan taslağı incelemeleri talep edilmektedir. Üyelerden 13 Şubat 2019 tarihine kadar görüşlerini bildirmeleri talep edilmektedir.

Marshall Adaları Cumhuriyeti tarafından ICS Sekreteryası'na "**MARPOL EK-VI Kural 18'in Daha İyi Uygulanması**" başlıklı bir taslak öneri gönderilmiştir. 15 Şubat 2019 tarihine kadar herhangi bir görüş, öneri veya iyileştirme / geliştirme talebinde bulunan bahse konu taslak öneri, 28 Ocak 2019 tarihinde iletilmiştir.

Taslak öneri, **IMO Küresel Entegre Denizcilik Bilgi Sistemi**'ne (GISIS) önerilen iyileştirmeler yoluyla, MARPOL EK-VI Kural 18'in uygulanmasıyla ilgili veri toplama ve analizini önermektedir. Sunumun ilk taslağı Ek'te bulunmaktadır.

ICS'nin, diğerlerinin yanı sıra sisteme yüklenen güvenlik raporlarında yakıt kalitesi ve ayrıntılandırılması GISIS Modülü'nün geliştirilmesini önerdiği MSC 100/8/1 dökümanını desteklediği Üyelerin bilgisi dahilindedir. Sekreteryaya, Ek'te bulunan taslak sunumun, IMO Sözleşmelerinde yakıt kalitesi ve güvenliği için mevcut hükümlerin etkili bir şekilde uygulanması konusunda MSC 100. Dönem Toplantısı'na sunulması niyetiyle tutarlı olduğunu düşünmektedir.

Üyelerden, taslak teklifi gözden geçirmeleri, desteklerini sunmaları ve 13 Şubat 2019 Çarşamba tarihine kadar görüşlerini göndermeleri talep edilmektedir.

Sunil Krishnakumar
Kıdemli Teknik Danışman

(sunil.krishnakumar@ics-shipping.org)

Ekler:**Ek - MARPOL Ek VI'nın Kural 18'in daha iyi uygulanmasına ilişkin MEPC Taslak sunumu**

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ÖNERİLER*(19. Paragraf)*

Akaryakıtta %0,50 m/m küresel kükürt üst limitinin etkili ve sorunsuz bir şekilde uygulanmasını desteklemek için, eş sponsorlar Komiteyi, MARPOL EK-VI Kural 18'in uygulanmasının arttırılmasıyla ilgili olarak veri toplama ve analiz önlemini kurumsallaştırmayı kabul etmesi için teşvik etmektedir. Bahse konu tedbir, GISIS veri tabanının mevcut MARPOL EK-VI GISIS Veri Tabanı Modülüne yapılan iyileştirmeler, mevcut veri toplama hükümlerinin genişletilmesi ve bu teklife Ek'te belirtilen stratejiye göre toplanan verilerin periyodik analizlerinin yapılması yoluyla oluşturulacaktır.

(20. Paragraf)

Veri toplanmasının GISIS veri tabanındaki iyileştirmeler uygulanır uygulanmaz başlaması önerilmektedir. Komiteden veri toplama sisteminin kurulması için sabit bir zaman dilimi oluşturulması veya veri toplama tedbirinin süresiz olarak yerinde kalmasının uygun olup olmadığını onaylaması istenmektedir.

(21. Paragraf)

Ayrıca, oluşturulan veri analizi raporlarının, ilgili alt komiteler tarafından garanti altına alınabilecek daha fazla değerlendirme için MEPC Komitesi'ne yıllık olarak raporlanması önerilmiştir. Bununla birlikte, 1 Ocak 2020'den sonraki ilk kritik yılda, ilk iki rapor, %0.50 m/m küresel akaryakıt kükürt sınırının uygulanmasının açık bir değerlendirmesini yapmak için sırasıyla MEPC 75 ve MEPC 76 Dönem Toplantılarında dikkate alınmalıdır. Bir önceki yıla ilişkin sonraki raporlar bundan sonra yıllık olarak hazırlanacaktır.

(22. Paragraf)

[Son olarak, MSC 100. Dönem Toplantısı'nın "Akaryakıt Kullanımına İlişkin Gemilerin Güvenliğini Artıracak Önlemlerin Geliştirilmesi" konusundaki sonuçlar göz önüne alındığında, MARPOL EK-VI Kural 18'in, MSC Komitesi'nin bu yeni çalışma sonucuna destek olmasında etkili bir şekilde uygulanmasının sağlanmasına da dikkat edilmelidir.]

ÖNERİLEN GISIS VERİTABANI GELİŞMELERİ VE VERİ ANALİZİ STRATEJİSİ**Bilgi Toplama**

1 GISIS Veritabanı modülü konusunda MARPOL Ek VI'da yapılan geliştirmeler:

a. "Yakıt Durumu" (18.1 ve 18.2.5) ile "Yakıt Kalitesi" (18.9.6) için ayrı bölümlerin oluşturulması;

I. Kural 18.1 (akaryakıt mevcudiyeti) için:

- 'Giriş Tarihi' için alan eklenmesi, arama işlevselliği eklenmesi, tedarikçi URL'si ve iletişim bilgileri için alan eklenmesi,

II. Yönetmelik 18.2.5 (yakıtın uygunsuz olduğuna dair kanıtlar) için:

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- Standart FONAR ile uyumlu hale getirmek için veri alanlarının genişletilmesi (PPR 6 ile tamamlanacaktır)

III. 18.9.6 Kuralı için (14 veya 18 numaralı kurallara uygunsuzluk durumları):

- Basamaklı seçim listeleri kullanılarak kural tanımlamasının ilgili gereksinimlere göre bağlanması, bu bölümdeki uygunsuzluğu belirtme seçeneğinin silinmesi (18.2.5), akaryakıt kalitesi parametrelerini belirtmek için kullanılan onay kutucuklarının genişletilmesi, olumsuz etkiler / hasar bildirmek için gönüllü olarak doldurulacak alanlar eklenmesi , laboratuvar raporları ve takip işlemleri (18.9.4)

b. Kullanıcı dostu arayüz iyileştirmeleri yapılması

c. Genel durum verilerinin gösterge tablosunun eklenmesi ve arama / rapor işlevlerinin eklenmesi

2 Tüm Üye Devletlerin (Taraf olmayanlar da dahil) derhal rapor etmesini teşvik etmek ve gönüllü olarak verilerin girilmesini kolaylaştırmada Üye Devletler ile diğer kuruluşlar arasında işbirliğinin teşvik edilmesi için MEPC Sirküleri yayımlanmalıdır.

Veri Analizi

3 Aşağıdakilerle ilgili istatistiksel bilgiler içeren MEPC Komitesi tarafından değerlendirilen 3 Yıllık Özet Raporu:

- Akaryakıt mevcudiyeti ve bulunabilirlik raporları
- Kural 14 uyarınca kükürt sınırlarına uyulmaması
- Akaryakıt kalitesi sorunları ve bunun sonucunda teknik / operasyonel zorluklar

4 Bölgesel ve küresel olarak sonuçlar sunan istatistiksel bir bilgi analizi dahil edilmelidir.

5 Analiz raporu, MARPOL uyarınca zorunlu raporlama sistemi için benzer bir standart format kullanılarak, Üye Devletlerin raporlama durumlarının bir listesiyle birlikte, MEPC Sirküleri olarak yayınlanmalıdır (örn. MEPC.1 / Circ.874). Rapor asgari olarak şunları içermelidir:

- Uygunluk bildiren taraf olan ülkelerin yüzdesi
- Uygunluk bildiren taraf olmayan ülkelerin yüzdesi
- Uygun yakıtın bulunması konusunda; yere göre ayrılmış (bölge / liman), akaryakıt türü, tarihi ve uygunluk durumuna göre raporlar
- Kükürt limitine uygun olmayan yakıtlar; yere göre ayrılmış (bölge / liman), akaryakıt türü tarihi ve uygunluk durumuna göre raporlar
- Düşük yakıt kalitesi raporları; yere göre ayrılmış (bölge / liman), akaryakıt türü, etkilenen kalite parametreleri ve tarihi ile ilgili raporlar
- Düşük yakıt kalitesinden kaynaklanan gemilerdeki hasar bildirme raporları

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28 January 2019

MC(19)09

To: **MARINE COMMITTEE**

Copy: **ENVIRONMENT SUB-COMMITTEE**
ALL FULL AND ASSOCIATE MEMBERS (for information)

**DRAFT SUBMISSION TO MEPC 74 ON ENHANCED IMPLEMENTATION OF
REGULATION 18 OF MARPOL ANNEX VI**

Action required: *Members are invited to note the information provided in this circular and review the draft submission attached at Annex. Members are requested to provide their comments by 13 February 2019.*

Members are informed that the Secretariat has received from the Republic of Marshall Islands a draft submission titled "enhanced implementation of regulation 18 of MARPOL Annex VI". The draft submission was received today (28 January 2019) with a request for any comments, suggestions or improvements to this initial draft by 15 February 2019.

The draft submission proposes data collection and analysis associated with the implementation of regulation 18 of MARPOL Annex VI through recommended enhancements to the IMO Global Integrated Shipping Information System (GISIS). The initial draft of the submission is attached at **Annex**.

Members may recall that ICS had co-sponsored the submission MSC 100/8/1 that *inter alia* proposed the improvement of the GISIS module to provide greater granularity in fuel quality and safety reports which are uploaded onto the system. The Secretariat considers that the draft submission attached at the annex is consistent with the intention of its submission to MSC 100 on the matter of effective implementation of existing provisions for fuel quality and safety in IMO conventions.

Members are requested to review the draft submission and advise their support (or otherwise) along with providing any other comments to the undersigned (sunil.krishnakumar@ics-shipping.org) by Wednesday 13 February 2019.

Sunil Krishnakumar
Senior Technical Advisor

Enclosures:

**Annex - Draft MEPC submission on enhanced implementation of regulation 18 of
MARPOL Annex VI**

MARINE ENVIRONMENT PROTECTION
COMMITTEE
74th session
Agenda item 5

MEPC 74/5/X
8 March 2019
Original: ENGLISH

Pre-session public release:

AIR POLLUTION AND ENERGY EFFICIENCY

Enhanced implementation of regulation 18 of MARPOL Annex VI

Submitted by [cosponsors]

SUMMARY

Executive summary: In response to the invitation by MEPC 73, the cosponsors provide a more fully developed proposal for a [data collection and analysis measure] through recommended enhancements to the IMO Global Integrated Shipping Information System (GISIS) database and a strategy for data analysis. The proposal focuses on enhancing the existing provisions of regulation 18 of MARPOL Annex VI relating to fuel oil quality and non-availability of compliant fuel oils, in order to promote greater understanding of the effectiveness of implementation of these provisions and to facilitate consistent enforcement of regulations 14 and 18 of MARPOL Annex VI.

Strategic direction, if applicable: 1

Output: 1.17

Action to be taken: Paragraph 23

Related documents: MEPC 73/5, MEPC 73/5/14, MEPC 73/19

Background

1 The Committee will recall its consideration of the discussion at the Intersessional Meeting on Consistent Implementation of Regulation 14.1.3 of MARPOL Annex VI (ISWG-AP 1) related to the safety implications associated with the use of low-sulphur fuel oil (MEPC 73/5, paragraphs 16 to 23). In this connection, document MEPC 73/5/14 (Bahamas et al.) provided information on respective challenges that the industry faces with the transition to 0.50% m/m sulphur fuel oil and proposed to establish an experience-building phase (EBP) associated with the worldwide availability of safe compliant fuel oil.

2 Based on the ensuing discussion and views expressed (MEPC 73/19, paragraphs 5.30 to 5.32), the Committee invited further concrete proposals to MEPC 74 on how to enhance the implementation of regulation 18 of MARPOL Annex VI, in particular on fuel oil quality and reporting of non-availability of compliant fuel oils, including the enhancement of the GISIS MARPOL Annex VI module to support data collection and analysis.

3 In response to this invitation, the cosponsors [and several other interested Members] collaborated informally to prepare a more fully developed proposal for a data collection and analysis measure. The proposal follows the principles of the basic structure for the measure, provided in the annex to MEPC 73/5/14. However, the focus is clearly placed on the provisions of regulation 18 of MARPOL Annex VI and collection of data relating to fuel oil quality and non-availability of compliant fuel oils. It is envisaged that subsequent analysis of this data would promote greater effectiveness of implementing these provisions and consistent enforcement of regulations 14 and 18 by Parties to MARPOL Annex VI.

4 Discussions during the collaborative process touched upon a wide range of issues associated with the implementation of regulation 18 of MARPOL Annex VI. The discussion was intended to clearly identify the preferred approach for the data collection and analysis measure through enhancement of the IMO GISIS database (expand the existing MARPOL Annex VI reporting module or develop a new stand-alone module), explore ways the GISIS database could be enhanced and the reporting process improved, and to identify a strategy for the data analysis to best achieve the goals of the measure.

Data Collection and GISIS Database Enhancements

5 Firstly, when considering a preferred platform for the measure, although some preference had been indicated for a separate dedicated module for this purpose, it was agreed to stay with the existing structure of the MARPOL Annex VI module of the GISIS database due to time constraints for development. It is considered rather important to begin the data collection measure as early as possible before 1 January 2020.

6 In enhancing the GISIS module, due attention must be placed on improving the interface functionality of the module itself. A more user-friendly experience can be achieved through using pull-down menus, cascading pick lists, and tick-boxes with pop-up instructions as far as possible where consistency of data would be critical for analysis. For the sake of clarity there would be benefit in reorganizing the module into two distinct sections for "Fuel Oil Availability" and "Fuel Oil Quality" reports and information, separate from the other reporting sections under the MARPOL Annex VI module. It was also suggested that a 'dashboard' summary of critical data fields along with ad-hoc search and report functionality could also ease accessibility of relevant information within a port or geographical area.

7 To achieve the goals of the proposed measure, a finer granularity in the reported data was also considered to be essential. The GISIS database as currently structured only allows for the submittal of data in a general way, which not only makes the interface somewhat difficult but also limits the degree of analysis that can be carried out for the purpose of identifying trends and regional "hot-spots" where implementation of requirements and availability are problematic. Discussion focused on sections 18.1, 18.2.5 and 18.9.6 of the MARPOL Annex VI module as currently structured, and the cosponsors identified several recommendations to better enhance the scope of information to be reported.

8 Specifically, in relation to regulation 18.1, it was noted that information as currently displayed is difficult to analyse and separate into reports, particularly due to a lack of date of

notification. Suggestions were made to add a field for the date when the notification under 18.1 was entered to facilitate data analysis. It was also considered desirable to expand functionalities similar to the tools in place for port reception facilities, such as including search functions to identify suppliers within listed ports/terminals or regions, adding fields to include links and contact information for listed suppliers, and to also enable correlation between ports/terminals reporting availability and received reports of fuel oil non-availability,

9 In the section for regulation 18.2.5, it was noted that information critical for analysis (such as the date of the notification) should be set as mandatory so that the entry cannot be saved unless this information is entered. Also, while notifications in some instances are being added as attachments, the information therein may be important for analysis. One solution would be to expand and harmonize the data fields in this section to coincide with information submitted in a standardized Fuel Oil Non-Availability Report (FONAR), being developed and finalized at PPR 6 as part of the guidelines for Consistent Implementation of Regulation 14.1.3 of MAPROL Annex VI.

10 In this regard, the cosponsors also discussed the possibility of broadening the scope of information to be reported or collected beyond what was required under MARPOL Annex VI, since some of the information in the FONAR may not be expressly required in accordance with regulation 18.2.5. Given that required information to be reported can only be mandated by regulation 18 of MARPOL Annex VI, any additional information beyond the scope of MARPOL Annex VI should only be made available on a voluntary basis, and if fields are made available to report such non-required information it should be clearly marked in the GISIS database as voluntary. However, as this information will have great utility for subsequent analysis, its reporting should be encouraged.

11 Lastly, for regulation 18.9.6, this was considered to be one section of the MARPOL Annex VI module with the greatest opportunity for improvement. Users are required to manually enter the regulation under 14 or 18 that was identified as an area of non-compliance. This leads to user error and duplication of entries, for example if section 18.9.6 is used to report a fuel oil non-availability case (which should instead be reported under section 18.2.5 of the module). Accordingly, it was noted this section should be used only for reporting non-compliance with sulphur requirements and quality with respect to equipment damage and safety issues. To this end, the section can be modified to utilize cascading pick-lists to limit the selection of relevant regulations to which non-compliance can be reported. Also, for the purpose of analysis in the case of fuel oil quality issues, expanded fields and tick-boxes could be utilized to capture more specific information on the particular fuel oil quality parameters identified to be off specification and also report any adverse effects to the ship, machinery damage, technical/operational problems, etc. Similarly with 18.2.5, additional fields should also be provided for voluntary reporting of information such as responses on follow-up actions per regulation 18.9.4 or near-misses, and clearly marked as voluntary.

12 In the context of capitalizing on useful or relevant information that may not be limited only to the reporting obligations of Parties to MARPOL Annex VI, and with the intention of seeing comprehensive data for subsequent analysis, the cosponsors engaged in a rather interesting discussion of possibly extending reporting rights to entities beyond Parties to MARPOL Annex VI. For example, some third-party organizations, such as fuel testing services, could provide very comprehensive statistical information on individual sample analysis results relating to fuel oil quality parameters. Consideration was also given to possibly extending reporting rights to Recognized Organizations.

13 While precedent was noted that reporting of relevant notifications to the MARPOL Annex VI module is not limited only to Parties to the convention, the majority of cosponsors

expressed the view that reporting should be limited only to Member States. Aside from legal considerations, this was considered necessary to preserve the integrity of the reported data as the IMO Secretariat is not expected to validate the reported data prior to analysis. However, owing to benefits for analysis purposes, the cosponsors consider it appropriate for Member States to collaborate with third-party entities where relevant and appropriate towards inputting voluntary data on sample test data relating to fuel quality parameters provided the Member State remains the focal point and the responsible entity for the accuracy of the data submitted.

Data Analysis and Report

14 The second element to the proposed measure will be for the Committee to consider an analysis of the collected data by reviewing an Analysis Report on a periodic (annual) basis. The key objective of the Analysis Report will be to give "visibility" to the data in order to assist the Committee gauge the implementation of regulations 14 and 18 of MARPOL Annex VI, inform industry stakeholders, and to also facilitate Parties in considering actions to take in carrying out enforcement obligations under the convention.

15 It was generally agreed that basic statistical results or reports could be generated from the collected information in the MARPOL Annex VI module by the IMO Secretariat. In the interest of developing a comprehensive report, it may be worthwhile to also evaluate other modules of the GISIS database to see if relevant associated information can be extracted during analysis (such as the Port State Control module for instances relative to Reg 18.9.5).

16 The cosponsors consider that to enable the goals of the proposed measure to be met, the analysis should provide information on three main areas:

- Fuel oil availability and non-availability
- Non-compliance with sulphur limits under regulation 14
- Fuel oil quality issues and resulting technical / operational challenges

17 The form of the Analysis Report could build on existing precedent, using a format similar to that used for summary reports on Alleged Inadequate Reception Facilities or the mandatory reporting system under MARPOL (i.e. MEPC.1/Circ.874). Importantly, however, it will be highly desirable to present the results of the analysis on a regional basis, as well as globally. Regional results will help to identify 'hotspots' with regard to areas where availability of compliant fuel oils are either problematic or readily available. The analysis could also be used to help resolve discrepancies with ports reporting availability that are also identified in non-availability reports.

18 By generating the Analysis Report in such a format, the results of the analysis could then be promulgated as an MEPC circular. This has the potential additional benefit of encouraging future and more widespread reporting by including a status of reporting by Member States and will also allow greater transparency of information for use by all industry stakeholders.

Proposal

19 In order to support an effective and smooth implementation of the 0.50% m/m global fuel oil sulphur limit, the cosponsors urge that the Committee agree to institutionalize a data collection and analysis measure associated with the enhancement of implementation of regulation 18 of MARPOL Annex VI. The measure would be established through enhancements to the existing MARPOL Annex VI module of the GISIS database, expanding existing data collection provisions and carrying-out periodic analysis of the data collected according to the strategy outlined in the Annex to this submittal.

20 It is proposed that the data collection commence as soon as the enhancements to the GISIS database are applied. [The committee is requested to confirm if a fixed timeframe for the data collection should be established, or if it would be appropriate for the data collection measure to remain in place indefinitely.]

21 It is further proposed that generated reports of the data analysis are reported to the MEPC on an annual basis, for further consideration by relevant sub-committees as may be warranted. However, during the first critical year after 1 January 2020, the first two reports should be made available for consideration at MEPC 75 and MEPC 76 respectively in order to make a clear assessment of implementation of the 0.50% m/m global fuel oil sulphur limit. Subsequent reports for the prior year would be produced annually thereafter.

22 [Lastly, taking into account the outcome of MSC 100 on 'development of measures to enhance safety of ships relating to the use of fuel oil', consideration should also be given to providing the data collected for the purpose of the effective implementation of regulation 18 of MARPOL Annex VI to MSC as well in order to aid the work of MSC on this new output.]

Action Requested of the Committee

23 The Committee is invited to consider the proposals in paragraphs 19-22 above and take action as appropriate.

ANNEX

PROPOSED GISIS DATABASE ENHANCEMENTS AND DATA ANALYSIS STRATEGY

Data Collection

- 1 Institute enhancements to the MARPOL Annex VI module of the GISIS Database by:
 - a. Creating distinct sections for "Fuel Oil Availability" (18.1 and 18.2.5) and "Fuel Oil Quality" (18.9.6);
 - i. For regulation 18.1 (fuel oil availability):
 - Add field for 'date of entry', add search functionality, add field for supplier url and contact information
 - ii. For regulation 18.2.5 (evidence of non-availability):
 - Expand data fields to harmonize with the standard FONAR (to be finalized by PPR 6)
 - iii. For regulation 18.9.6 (non-compliance with regulation 14 or 18):
 - Lock regulation identification to relevant requirements using cascading pick-lists, delete option to cite non-availability in this section (18.2.5), expand using tick-boxes to specify fuel oil quality parameters, add voluntary fields for reporting adverse effects / damage, lab reports and follow-up actions (18.9.4)
 - b. Institute user-friendly interface improvements; and,
 - c. Include a dashboard of overview data and include search/report functions
- 2 An MEPC circular should be issued to urge immediate reporting by all Member States (including non-Parties), and to encourage cooperation between Member States and other organizations to facilitate input of voluntary data.

Data Analysis

- 3 Annual Summary Report¹ considered by MEPC containing statistical information on:
 - a. Fuel oil availability and on non-availability reports;
 - b. Non-compliance with sulphur limits under regulation 14; and,
 - c. Fuel oil quality issues and resulting technical / operational challenges.
- 4 An analysis of statistical information should be included, presenting results on a regional basis as well as globally.
- 5 A report of the analysis should be published as an MEPC circular, along with a listing of the status of reporting by Member States, using a similar standard format for the mandatory reporting system under MARPOL (i.e. MEPC.1/Circ.874). The report should include as a minimum:
 - a. #/% of parties reporting availability
 - b. #/% of non-parties reporting availability
 - c. # of reports of non-availability, broken down by location (region/port), type of fuel oil and date
 - d. # of reports on sulfur non-compliance, broken down by location (region/port), type of fuel oil and date
 - e. # of reports of poor quality, broken down by location (region/port), type of fuel oil, affected quality parameter(s) and date

¹ It is proposed that for the first year after 1 January 2020, two summary reports are produced – data up to the first quarter of 2020 reported to MEPC 75, and up to the third quarter of 2020 reported to MEPC 76.

f. Report on damage to ships caused by poor F/O quality