

Circular 197/ 2019

To: Vessel Owners, Managers, Masters, Officers, Deputy Registrars and Other Interested Parties

Subject: MARPOL Annex VI – New China Domestic Emission Control Area & Data collection of Energy Consumption

Date: 4th February 2019

Summary

1. New China Domestic ECA Plan 2018

China's Ministry of Transport released two regulations in the 4th quarter of 2018, which entered into force on Jan 1, 2019:

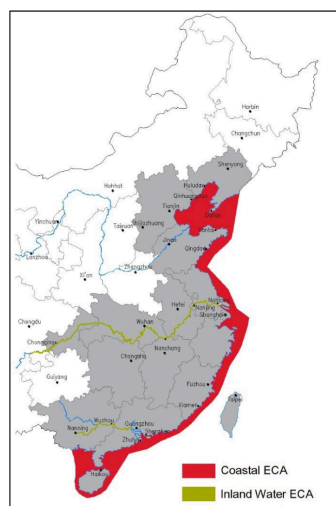
- *Implementation Plan for Marine Air Pollutant Emission Control Areas*
- *Regulation on Data Collection of Energy Consumption for Ships*

According to the officially published document, the emission control areas are categorized as:

- Coastal Emission Control Area
- Inland Water Emission Control Area

The scope of Coastal Emission Control Area has been extended to cover all China coastal territorial waters (12 nautical miles from the coastal line¹), excluding the territorial waters from the coastline of Hong Kong, Macao and Taiwan. Hainan Island territorial coastal waters are within China ECA and are specifically defined. The Inland Water Emission Control Area includes the navigable waters of Yangtze River and Xi-Jiang River.

The previous ECAs are naturally included in the upgraded China Domestic ECA 2018. The new China ECA extension is illustrated in Figure below:



Note: The extension of 12 nautical miles is an interpretation with referred to Chinese local authority, which is not officially defined in the 2018 China ECA plan.

Emission Control Requirements

The latest China ECA plan requires ships to comply with the SO_x emission and particulate matter control requirements:

- Beginning January 1, 2019, ships entering the new China ECAs must use fuel with ≤0.5% sulfur content.
- Starting January 1, 2020, ships entering the Inland Water ECA must use fuel with ≤0.1% sulfur content.
- Beginning March 1, 2020, ships, not equipped with an EGCS, entering China's ECAs must carry the required sulfur content fuel (≤0.5% sulfur content for the Coastal ECA and ≤0.1% sulfur content for the Inland Water ECA).
- Starting January 1, 2022, ships entering the regulated waters of Hainan Island must use fuel with ≤0.10% sulfur content.

An exhaust gas cleaning system (EGCS) is currently accepted as an equivalent measure for complying with the above requirements. The possibility of implementing 0.1% Sulphur cap in all China ECAs from 2025 is expected to be considered at a later date.

Following the release of the 2018 China ECA plan, the China MSA published a notice regarding supervision of the implementation of the updated ECA plan. For those who have ships with installed open-loop SO_x scrubbers, the following points should be considered:

- The discharge and treatment of water pollutant generated by EGCS shall comply with the relevant requirements.
- Discharge of open-loop scrubber washwater is prohibited in most portions of the new ECAs, including the Inland Water ECA, Bohai Rim waters and ports within the Coastal Water ECA.
- The prohibition of discharging washwater from open-loop scrubbers in the rest of the Coastal Water ECA is still being considered.

Currently, China does not ban open-loop scrubbers in all China domestic ECAs. However, restrictions on washwater discharge from open-loop scrubbers exists for inland waters, port waters within coastal ECAs, and the Bohai rim waters.

2. Ship's Energy Consumption Data Reporting

The China MSA released the Regulation on Data Collection of Energy Consumption for Ships in November 2018. This regulation requires ships calling on China ports to report fuel consumption and transport work details directly to the China MSA.

This regulation includes the requirements for both Chinese-flagged vessels (domestic and international) and other non-Chinese flagged international navigating vessels. This document mainly focuses on the key requirements which are applicable to non-Chinese flagged operating internationally.

The above regulation is applicable to all non-Chinese flag ships not less than 400 GT or with propulsion power 750 kW and above, which call on China ports (excluding ports in Hong Kong, Macao and Taiwan).

The vessel's owner/master/operator shall report the energy consumption data to China MSA for voyages calling at a China port. This means that only the last voyage before arriving at a China port should be reported. The outbound voyage once departing a China port does not need to be reported.

The reporting will be done when preparing the documents for departing a China port. So, the data should be reported each time a vessel departs from a China port.

The ship's owner/master/operator and the authorized agent can conduct the reporting task.

The required data items to be reported are contained in the standard forms provided by the China MSA. The forms include three parts:

- Ship specific information
- Transport work details, including cargo amount, distance traveled, time underway and in operation
- Energy consumption, including fuel type, quantity and data collecting measures, shore power consumption, whether use an EGCS, etc.

Once the fuel oil consumption data is collected, then it is to be reported via the Maritime Information Platform maintained by China MSA. The reporting entity should register an account to the portal in advance via the link <http://csp.msa.gov.cn/>. The data can be filled into the web-based forms.

If the web-based platform is not working, it is recommended that the paper form be filled out and submitted to the local China MSA prior to the vessel leaving port.

The China's energy consumption data collection regulation has similar methodology with IMO Data Collecting System (DCS) and EU Monitoring, Reporting, Verification (MRV).

If you have any queries, please contact the Technical Department
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