

Merchant Marine Circular

Panama Maritime Authority
General Directorate of Merchant Marine
Control and Compliance Department

MERCHANT MARINE CIRCULAR MMC-375

To: Ship-owners, Ship-operators, fuel-oil suppliers, Recognized Organizations (RO's), Legal Representatives of Panamanian Flagged Vessels, and Panamanian Merchant Marine Consulates.

Subject: Ship Implementation Plan for the Consistent Implementation of the 0.50% Sulphur Limit under MARPOL Annex VI

Reference: Resolution No. 107-OMI-228-DGMM dated February 3, 2020 adopting Resolution MEPC.305(73) dated October 26, 2018.

Resolution MEPC.320(74) - 2019 Guidelines for Consistent Implementation of the 0.50% sulphur limit under MARPOL Annex VI **(Only as a recommendation)**

MEPC.1/Circ.878 - Guidance on the Development of a ship implementation Plan for the Consistent Implementation of the 0.50% Sulphur Limit under MARPOL Annex VI **(Only as a recommendation)**

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1. Following the information given through our Merchant Marine Notice No.: MMN-01/2019 of January, 2019 and with the purpose to communicate and facilitate smooth and consistent implementation of the 0.5% Sulphur limit under MARPOL Annex VI, this Administration strongly recommends to develop implementation plans, outlining how the ships may prepare in order to comply with the required sulphur content limit of 0.50% by 1 January 2020. The plan should be complemented with a record of actions taken by the ships in order to be compliant by the applicable date.
 2. The aim of this measure to have an implementation plan is to increase awareness of the ships' crew and company on the matter and encourage compliance with Regulations 14(1) and 18 of MARPOL Annex VI from 1 January 2020. A ship implementation plan is not a mandatory requirement. A lack of a ship implementation plan or an incomplete ship implementation plan should not be considered as "clear grounds" for a more detailed inspection.

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3. IMO Circular MEPC.1/Circ.878 on Guidance on the development of a ship implementation plan for the consistent implementation of the 0.50% sulphur limit under MARPOL Annex VI (hereafter the "Ship Implementation Plan Guidance") addresses some safety issues identified with regard to 0.50% maximum sulphur fuel oil, in particular through the section on risk assessment (Annex of the Ship Implementation Plan Guidance) and additional guidance is provided on impact on machinery systems and tank cleaning (appendix 2 and appendix 3 of the Ship Implementation Plan Guidance, respectively).
4. A ship implementation plan for the consistent implementation of the 0.50% sulphur limit is recommended to be developed based on the indicative example as set out in appendix 1 of IMO MEPC.1/Circ.878 "Ship Implementation Plan Guidance".
5. The Implementation plan could take into account the issues identified in:
 - 5.1. appendix 2 of IMO MEPC.1/Circ.878: additional guidance on development of ship implementation plan (impact on machinery systems); and
 - 5.2. appendix 3 of IMO MEPC.1/Circ.878: additional guidance on development of ship implementation plan (tank cleaning).
6. Guidance on the Development of a Ship Implementation Plan for the Consistent Implementation of the 0.50% Sulphur Limit under MARPOL Annex VI of 9 November 2018, on IMO Circular MEPC.1/Circ.878, is appended to this Circular for an easy reference.
7. As it is indicated in IMO Resolution MEPC.320(74) adopted by the Marine Environmental Protection Committee at its 74 session, there are additional information that should be observed when implementing the new sulphur limit such as type of fuels used, ship tank configuration and fuel system, tank cleaning heating requirements, fuel treatment system, procedures for verification issues and control mechanism and actions, guidance and information sharing on fuel oil non-availability, standard format for reporting fuel oil non-availability and possible safety implications relating to fuel oils meeting the 0.5% m/m sulphur limit.
8. Additional technical information and a review, displayed in tabular format, of the possible potential safety implications is set out in appendix 2 of Resolution MEPC.320(74) (annexed to this circular for easy reference).
9. Reference should also be made to general industry guidance on potential safety and operational issues related to the supply and use of 0.50% maximum sulphur fuels.



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10. For ships which are unable to purchase fuel oil meeting the requirements of regulations 14.1 or 14.4 of MARPOL Annex VI, the standard format for reporting fuel oil non-availability pursuant regulation 18.2.4 of MARPOL Annex VI "Fuel Oil Non-Availability Report (FONAR)", is available [here](#) for easy download and fill.

November, 2021 – References were updated and the entire text was revised.

October, 2019 - Updated form for "Fuel Oil Non-Availability Report (FONAR)", Paragraph 10.

August, 2019.

Inquiries concerning the subject of this Merchant Marine Circular or any other request should be forward to:

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