



VITSAN

MÜMESSİLLİK VE MÜŞAVİRLİK A.Ş.

P & I CLUB CORRESPONDENTS

14 February 2020

Subject : Use of scrubber in Turkiye **“CIRCULAR TO ALL P&I CLUBS”**

Dear Sirs,

As per MARPOL ANNEX VI, IMO 2020 sulphur requirements have taken effect globally on 01 January 2020. Many Ship Owners have decided to use scrubbers to comply with the bunker sulphur requirements. Therefore, we would like to inform you about the latest developments concerning the exhaust gas scrubber usage in Turkish waters.

“Directorate of Maritime” of Ministry of Transport and Infrastructure made an announcement on 31.01.2020 concerning to usage of scrubber and disposal of wash water in Turkiye. This announcement of Ministry has cleared some concerns about scrubber use and disposal of wash water. Yet there are not any distinct regulations except the announcement from the authority, as a result, Ship Owners consider to be precautious about the use of scrubber.

Announcement dated 31.01.2020 briefly states that scrubbers are considered to be an equivalent operation within the scope of Rule 4 of MARPOL Annex VI and there are not any restrictions for vessels sailing in Turkish waters to use scrubbers regardless the type of scrubbers, and disposal of wash water (except wastes/residues) in Turkiye is also not prohibited. Also, the announcement states that these type of issues are under the scope of the Ministry of Environment and Urbanization. Furthermore, IMO’s with resolution number MEPC.259(68) about the guidelines for exhaust gas cleaning systems must be followed.

Ministry of Environment and Urbanization has made two announcements on 26.11.2019 and 31.01.2020 regarding the use of scrubbers. The announcement made on 26.11.2019 from the Ministry states that the residues/sludges arising from exhaust gas cleaning systems and disposal washing waters produced by the closed type scrubbers must be stored as waste and should not be discharged to sea as per the MARPOL ANNEX VI.

On the other hand, the announcement made on 31.01.2020 by the Ministry of Environment and Urbanization declares that if the vessel decided to use low-sulphur fuel instead of using scrubber, the fuel that does not comply with the Sulphur requirements must be discharged from the vessels until end of February 2020 and should not be stored on board the vessels after end of February 2020.

If the Ship Owners wish to use scrubbers (especially open types) instead of low sulphur bunker, we recommend that utmost attention should be given to avoid any possible pollution fine risks. Otherwise, pollution fines may be imposed to the vessels.

We will keep you updated on developments, and please do not hesitate to contact with us if you have further inquiries.

Above given without prejudice.

Submitted for your kind info.

Best regards,
VITSAN MUMESSİLLİK VE MUSAVİRLİK AS, ISTANBUL

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Head office : Bilezik Sokak No. 4 FİNDİKLİ, 34427, İSTANBUL/TURKEY

P: (90 212) 252 06 00 (8lines) F: (90 212) 249 44 34 www.vitsan.com.tr vitsan@vitsan.com.tr