



VITSAN

MÜMESSİLLİK VE MÜŞAVİRLİK A.Ş.

P & I CLUB CORRESPONDENTS

14 April 2021

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.

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 06 April 2021 by the Ministry of Environment and Urbanization declares that the Article 23-b of the Regulation on Control of Water Pollution stipulates that “It is prohibited to discharge garbage, petroleum and petroleum products, bilge water, dirty ballast water, sludge, oil and suchlike liquid or solid residues, all kind of cargo residues from vessels sailing and aircrafts flying in the air space over Turkish territorial waters” and according to this article it is prohibited to discharge scrubber wash water from the vessels in Turkish territorial waters.

In view of the latest announcement by the Ministry of Environment and Urbanization, vessels operating an open-loop scrubber will have to switch to low-sulphur compliant fuels when entering / sailing in Turkish waters.

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,
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