

Turkey – New requirements for fuel oil sulphur content

As part of the measures implemented to prevent and reduce air pollution, MARPOL Annex VI sets out the requirements for the sulphur content of any fuel oil used onboard ships in general and for the Emission Control Areas (ECAs) in particular. However, stricter regulations covering the sulphur content of fuel oil may also be enforced by local regulators and Gard has been advised that as of 1 January 2012, Turkey will enforce new regulations covering the limits of the sulphur content of marine fuels used by vessels within its domestic territorial waters. The purpose of the new regulations is reportedly to align these with the requirements contained in the EU Directive for the sulphur content of marine fuels and of MARPOL Annex VI.

Based on information published by the [Turkish Chamber of Shipping and the Turkish General Directorate of Marine Transport](#) in September 2011, the new Turkish requirements are:

<i>Effective date</i>	<i>Type of vessel and operation</i>	<i>Sulphur content limit required</i>
1 January 2012	All vessels arriving at Turkish ports and all inland waterway vessels sailing on Turkish inland waters	Marine fuels at or below 0.1% sulphur
	All passenger vessels providing regular services in areas covered by Turkey's marine jurisdiction	Marine fuels at or below 1.5% sulphur

It has also been indicated that Turkish flagged vessels, when sailing within "SOx Emission Detection Fields as defined by the International Maritime Organization" cannot use marine fuels with a sulphur content exceeding 1.5%. Assuming that this refers to the ECAs defined in MARPOL Annex VI, Members and Clients should be aware that the requirements of MARPOL Annex VI, i.e. the use of marine fuels at or below 1.0% sulphur content within ECAs regardless of flag, will prevail.

Gard's correspondents in Turkey advise that, to their knowledge:

- The regulations apply to all vessels safely at berth or at anchor within the boundaries of any port, and staying at berth or at anchor for more than 2 hours. Fuel replacement operations must take place in the shortest possible time following the vessel's arrival in port.
- "Inland waters" means the natural and artificial lakes, reservoirs, fisheries and rivers of Turkey; the Turkish Straits, the Bosphorus and the Dardanelles, and the Marmara Sea are reportedly not part of this definition. However, it has been indicated that vessels transiting the Turkish Straits may still be subject to the new regulations if their stay at an anchorage whilst awaiting passage exceeds 2 hours.
- There are currently no detailed indications as to how the Turkish authorities intend to follow-up the new regulations and what the consequences will be of contravening the regulations.

Gard's Members and Clients trading to Turkey should ensure that their vessels comply with the new Turkish regulatory requirements by 1 January 2012. It is important that operators specify, and crew members verify, that the sulphur level in the bunker delivery note conforms to ISO 8217 and is within the sulphur limits set by local regulators and MARPOL.

According to Gard's correspondents, information about the new fuel regulations has not been readily available and there is no clear indication of how the Turkish authorities will interpret them. Prior to entering Turkish territorial waters, Members and Clients should also check with local sources and/or their local agents whether there is any additional or new information available from the authorities.

We would like to thank Gard's correspondents in Turkey, Kalimbassieris Maritime Ltd and Vitsan Mümessillik ve Musavirlik A.S., for the above information.