



TECHNICAL CIRCULAR No. 045 of 19th February 2012

To:	All Surveyors/Auditor
Applicable to flag:	All Flags
Subject:	Guidance for CONARINA Auditors: Use of Low-Sulphur Fuels onboard vessels
Reference:	SOLAS , ISM

Guidance for CONARINA Auditors

Your attention is drawn to the following Regulations relating to the use of Low-Sulphur Marine Fuel for Main and Auxiliary Engines.

- 1. Article 4b of "EU COUNCIL DIRECTIVE 1999/32/EC of 26 April 1999 relating to a reduction in the sulphur content of certain liquid fuels and amending Directive 93/12/EEC"**, as amended, introduces 0.1% sulphur limit (m/m) for marine fuel.

Effective Date: January 1, 2010.

Applies to: All types of marine fuel used by ships after securing ship at berth in EU ports allowing sufficient time for crew to complete any necessary fuel oil change over procedure as soon as possible after arrival at berth and as late as possible before departure from berth.

The EU requirement to use 0.1% sulphur (m/m) marine fuel does not apply to ships

- (1) employing an approved emission abatement technology onboard
- (2) using shore power (in lieu of ship's service generators) and/or
- (3) whenever, according to published timetables, ships are due to be at berth for less than two hours.

2. California Air Resources Board (CARB)

Effective Dates:

Phase I (in force) since July 1, 2009 MGO (ISO 8217, DMA Grade) at or below 1.5%S or MDO (ISO 8217, DMB Grade) at or below 0.5%S, and after August 1, 2012 MGO at or below 1.0%S or MDO at or below 0.5%S

Phase II - January 1, 2014 [MGO (ISO 8217, DMA Grade) or MDO (ISO 8217, DMB Grade) at or below 0.1%S.

Applies to: All types of marine fuel used by ships within California Waters (within 24NM of the California baseline consistent with the Contiguous Zone).

Customer Service Center
5201 Blue Lagoon Drive, 9TH. Floor,
Miami, Fl., 33126
Tel: 1 (305) 716 4116,
Fax: 1 (305) 716 4117,
E-Mail:

joel@conarinagroup.com

Technical Head Office
7111 Dekadine Ct.
Spring, Tx., 77379
Tel: 1 (281) 370 9363,
1 (713) 204 6380

E-Mail: tho@conarinagroup.com,
houston@conarinagroup.com

Note that main engines, auxiliary engines and all auxiliary boilers on board the vessels trading in these regions will be affected by the CARB Regulation.

2. Auditors' instructions

ISM auditors onboard the vessels affected by these regulations should verify compliance with these new regulations in accordance with 1.2.3 of the ISM Code and as follows:

On board CONARINA Class Vessels affected by these regulations, the ISM auditor should verify that:

- A Design Evaluation has been carried out and that a copy is available on board. This Design Evaluation is to consider all potential risks applicable to the vessel, including those identified by CONARINA and others, as appropriate (owners, manufacturers, and/or other competent authority recognized by owners/manufacturers, if any).
- When modifications to existing machinery have been identified, modification plans and data together with the above-mentioned Design Evaluation have been submitted to the CONARINA technical office for design assessment and modifications carried out under survey.
- A detailed fuel-oil-changeover plan, operation manual or procedure has been developed and implemented.
- Engineers are familiar with the fuel-oil-changeover procedure and associated hazards.
- Proper records are being maintained in accordance with 11.3 of ISM Code.

Details of verification may be included in the general remarks of the report or within your auditor notes.

REFERENCES:

SOLAS, ISM, ISPS

ATTACHMENTS: No.

Kindest Regards,
Cosmin Bozenovici
Naval Architect – Conarina Technical Head Office

Customer Service Center
5201 Blue Lagoon Drive, 9TH. Floor,
Miami, FL, 33126
Tel: 1 (305) 716 4116,
Fax: 1 (305) 716 4117,
E-Mail:

joel@conarinagroup.com

Technical Head Office
7111 Dekadine Ct.
Spring, Tx., 77379
Tel: 1 (281) 370 9363,
1 (713) 204 6380

E-Mail: tho@conarinagroup.com,
houston@conarinagroup.com