



South African Maritime Safety Authority

Ref. SM 6/5/2/1

Date: 16 March 2020

Marine Notice No. 11 of 2020

Wash-water discharge from Open Loop Scrubbers update

TO SHIP OWNERS, OPERATORS, MASTERS, SHIP AGENTS, PRINCIPAL OFFICERS, REGIONAL MANAGERS, PORT STATE CONTROL OFFICERS AND MARITIME INDUSTRY

Summary

This marine notice lists the name of countries and ports regarding local Regulations for wash-water discharges of Open-Loop Scrubber as per last update of February 2020.

South African Ship Owners, Operators and Masters are advised to further consult local Authorities for updates on areas not mentioned in this Marine Notice.

Country	Port	Comments
Bahrain	All ports	<ul style="list-style-type: none"> ◆ Discharging of wash water from Open-Loop scrubber is prohibited when the vessel is within port of Bahrain including the anchorage area. ◆ Discharging of wash water from Open-Loop scrubber is allowed into Bahraini territorial waters and Exclusive Economic Zone (EEZ) provided that the scrubber is Class approved.
China	All ports	<ul style="list-style-type: none"> ◆ Ships are prohibited to discharge wash water from Open-Loop scrubbers in China Emission Control Areas, which effectively means the territorial waters of China. ◆ China Emission Control Area boundary line is connected by 60 points as illustrated in figure 1 of attached Huatai Circular PNI1907. (Refer to attached document)
Egypt	Suez Canal	<ul style="list-style-type: none"> ◆ Wash water from exhaust gas cleaning system shall not be discharged into water during vessels transit of Suez Canal. ◆ Our fleet should use compliant fuel when passing the Suez Canal under Flag State requirement whether Egypt have yet to ratify MARPOL Annex VI.
Singapore	All ports	<ul style="list-style-type: none"> ◆ MPA announced that discharge of wash water from Open Loop scrubber is prohibited in Singapore port limits.
Malaysia	All ports	<ul style="list-style-type: none"> ◆ Malaysia prohibits the discharge of wash water from Open Loop scrubber system whilst in Malaysian waters (12 nautical miles from the nearest land)
Qatar	All ports	<ul style="list-style-type: none"> ◆ Water discharges from scrubber containing any chemicals or metals from ships is strictly prohibited in Qatari waters.
Pakistan	Karachi	<ul style="list-style-type: none"> ◆ The discharge of wash water from Open-Loop scrubber is prohibited in port.

UAE	Fujairah	<ul style="list-style-type: none"> ◆ Port of Fujairah has decided to ban Open Loop scrubber in its waters. ◆ Territorial limits of Port of Fujairah are 12 Nautical miles from the shoreline.
	Dubai (Jebel Ali, Rashid, Hamriya)	<ul style="list-style-type: none"> ◆ Discharge of wash water from Open-Loop scrubber in Dubai territorial waters is prohibited.
	Port of Ruwais	<ul style="list-style-type: none"> ◆ Open loop scrubber is not restricted, however, local agent recommends that it should not to be used.
	Umm Al Quwain	<ul style="list-style-type: none"> ◆ Wash Water discharge is prohibited in port. Hence, vessels shall switch over to complaint fuel instead while operating within territorial waters.
	Abu Dhabi (Khalifa, Mina Zayed)	<ul style="list-style-type: none"> ◆ Open loop scrubber is not restricted, however, local agent recommends that it should not to be used.

AMERICA

Country	Port	Comments
Bermuda	All ports	<ul style="list-style-type: none"> ◆ Wash water and residue from exhaust gas cleaning system shall not be disposed of in Bermuda or discharged into Bermuda's waters but shall be stored on board the ship until outside of Bermuda's waters. ◆ If vessel requires to use closed loop scrubber, permission needs to be sought from the authorities. ◆ Bermuda's territorial waters are defined as the sea within 12 nautical miles of the baselines.
Panama	Panama Canal	<ul style="list-style-type: none"> ◆ The Panama Canal Authority (ACP) prohibits the use of open loop scrubber when transiting Panama Canal. ◆ Vessels opting to use closed loop scrubber or hybrid in closed loop mode must submit a copy of IAPP certificate and total volume of holding tanks to ACP for evaluation, at least 96 hours prior to ETA at Panama Canal Waters.
USA	California	<ul style="list-style-type: none"> ◆ California Air Resources Board's Ocean-Going Vessel Regulation only allows the use of marine distillate fuels (MGO/MDO) with sulphur content of 0.10% max in Californian waters. ◆ Vessels must switch to compliant fuel before entering Californian coast (24 nautical miles of the California baseline).
	Connecticut	<ul style="list-style-type: none"> ◆ Discharge of wash water into Connecticut waters from any vessel is prohibited under Vessel General Permit (VGP) 2013 section 6.5.9. ◆ For Connecticut State water boundary, please refer to attached Countries and Ports Notices or Circular on the Scrubber system folder.

EUROPE

Country	Port	Comments
Belgium	All ports	<ul style="list-style-type: none"> ◆ Discharge of wash water from scrubber system is prohibited in Belgian ports or inland waters. The Legal reference is [Law of 26 March 1971 on the protection of surface waters against pollution (transposition of the Water Framework Directive in Flanders)]. ◆ Ships sailing to/from Antwerp are prohibited from using open loop scrubber while on the Belgian side of the border.
Germany	All ports	<ul style="list-style-type: none"> ◆ According to Article 3(1) of the CNDI (<i>Convention on the Collection, Deposit and Reception of Waste occurring in the Course of Navigation Inland and on the Rhine</i>), the discharge of ship-generated waste by all ships, including seagoing vessels, is prohibited. Scrubber wash water can be classified as ship-generated waste. ◆ The CNDI is applicable to all German inland waterways open to all general transport.

Country	Port	Comments
Ireland	Cork	<ul style="list-style-type: none"> ◆ The discharge of exhaust gas scrubber wash water is prohibited with the limits of Port of Cork Co. Applies to all vessels berthed at any berth within the port's jurisdiction and vessel on transit to and from any berth or anchorage. ◆ Port limits commence at the Eamonn De Valera and Michael Collins bridge in the city and extend to an imaginary arc with a radius of 9.65 kilometers drawn seawards from Roches point.
	Dublin	<ul style="list-style-type: none"> ◆ Wash water from exhaust gas scrubber system shall not be discharged to surface waters within the jurisdiction of Dublin Port Co. ◆ Limits of Dublin port from Matt Talbot Memorial Bridge eastward to a line from the Baily Lighthouse through the North and South Buford buoys and through Sorrento Point.
	Waterford	<ul style="list-style-type: none"> ◆ The discharge of exhaust gas scrubber wash water is prohibited with the limits of Port of Waterford Co. Applies to all vessels berthed at any berth within the port's jurisdiction and vessel on transit to and from any berth or anchorage.
Latvia	All ports	<ul style="list-style-type: none"> ◆ Current general position is that discharge is not allowed in territorial and port waters. ◆ Discussions on improvement of national regulation regarding discharges from scrubber is still ongoing.
Lithuania	All ports	<ul style="list-style-type: none"> ◆ According to port rules and conditions approved by Ministry of Transport, the discharge of scrubber wash water is not allowed in port waters. ◆ The authorities are currently studying the impact of scrubber wash water on the marine environment and will provide its conclusion upon completion.
Norway	Nærøyfjord, Aurlandsfjord Geirangerfjord, Synnølvfjord & Tafjord	<ul style="list-style-type: none"> ◆ Norwegian Maritime Authority prohibits the use of open loop scrubbers in the Norwegian fjords. ◆ Ships using closed loop scrubber or hybrid scrubber on closed loop mode are required to use device for reducing visible emissions to air.

[Huatai Circular PNI1907 \(China Emission Control Area\)](#)

The Domestic Emission Control Areas for the Atmospheric Pollution from Vessels (hereinafter referred to DECAs) include both the coastal control area and inland river control area.

16 March 2020

SM6/5/2/1

Issued by and obtainable from:
The South African Maritime Safety Authority
146 Lunnon Road
Hillcrest, Pretoria 0083

PO Box 13186
Hatfield 0028

Tel: +27 12 366 2600

Fax: +27 12 366 2601

E-mail: marinenotices@samsa.org.za

Web Site: www.samsa.org.za