



# MARSHALL ISLANDS PERSPECTIVE OF IMO 2020 IMPLEMENTATION AND ENFORCEMENT

Symposium on IMO 2020 and Alternative Fuels  
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# EXISTING REGULATORY FRAMEWORK (ERF): CHAPTER 2 – MARPOL ANNEX VI SURVEY, CERTIFICATION, AND CONTROL

## Equipment, Systems, and Arrangements

- Statutory survey and certification
  - Regulation 5 – Surveys
  - Regulation 6 – Issuance of Certificates
  - Harmonized System of Survey and Certification Guidelines
- Delegation of survey and certification functions
  - Issue / endorse IAPP Certificate after completion of relevant surveys
  - Review equivalents for compliance with the standards set forth in MARPOL Annex VI



# ERF: CHAPTER 2 – MARPOL ANNEX VI SURVEY, CERTIFICATION, AND CONTROL (continued)

## Operational Requirements:

- Regulation 10 – PSC on operational requirements
  - Article 6 (MARPOL 73)

## Enforcement:

- Regulation 11 – Detection of Violations and Enforcement
  - Article 4 (MARPOL 73)
  - RMI Maritime Regulations (MI-108) Section 2.13:

### **.8 Non-Compliance; Penalty.**

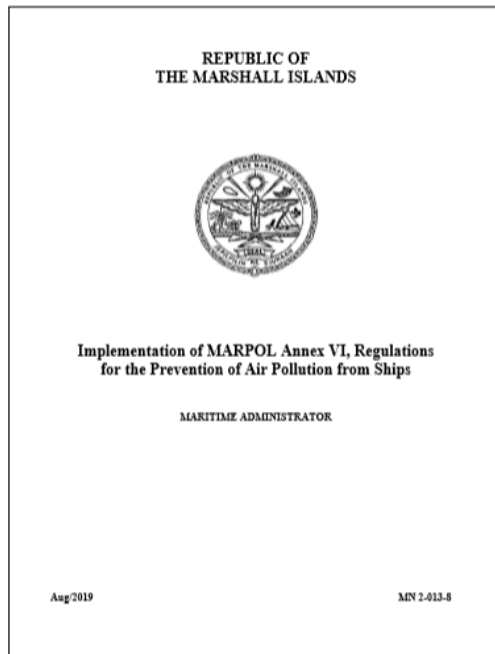
In the event of failure to comply with paragraphs .2 through .7 hereof, the Maritime Administrator, or an official who is authorized to act for and on behalf of the Maritime Administrator, may suspend or cancel a vessel's Certificate of Registry and/or impose a monetary penalty not to exceed US\$1,000,000 per incident or violation, and/or set such other conditions as may be necessary to bring about compliance with these National Standards and International Agreements to which the RMI is a Party, and which are in force, or the provisions of which are applied by the RMI in advance of the official date of their entry into force.

Maritime Act Section 115.



# RMI MARINE NOTICE 2-013-8

- Revised August 2019 to incorporate MEPC 73, MEPC 74, and MSC 101 outcomes:
  - Ship Implementation Planning Guidance (MEPC.1/Circ.878)
  - Non-Compliant Fuel Oil Carriage Prohibition (Resolution MEPC.305(73))
  - Reporting Non-Compliant Flashpoint Parameter (Resolution MSC.465(101))
  - Fuel Oil Non-Availability Report Format (RMI Form MI-112)



Tel: [ ]	<b>REPUBLIC OF THE MARSHALL ISLANDS</b>	Office use only:
Fax: [ ]	MARITIME ADMINISTRATOR	[ ]
<b>COMPLIANT FUEL OIL NON-AVAILABILITY REPORT</b>		
Vessel Name: [ ]	Flag: Marshall Islands	IMO number: [ ]
If other relevant registration number is available, enter here: [ ]		
Provide a description of the vessel's voyage plan in place at the time of entry into [country name] waters' (attach plan copy if available)		
Last port of departure: [ ]	Date of departure from last port: 88-mm-yyyy	
First port of arrival in [country name]: [ ]	Date of arrival at first [country name] port: 88-mm-yyyy	
Date vessel first received notice that it would be transiting in [country name] waters: 88-mm-yyyy	Vessel's location at the time of notice: [ ]	
Date and time vessel operator expects to enter [country name] waters: 88-mm-yyyy 88-mm-UTG	Date and time vessel operator expects to exit [country name] waters: 88-mm-yyyy 88-mm-UTG	
Projected days vessel's main propulsion engines will be in operation within [country name] waters: [ ]		
Sulphur content of fuel oil in use when entering and operating in [country name] waters: [ ]		
1) Provide a description of actions taken to attempt to achieve compliance prior to entering [country name] waters. 2) Include a description of all attempts made to locate alternative sources of compliant fuel oil. 3) Describe the reason why compliant fuel oil was not available.		
<b>Suppliers Contacted</b>		<b>Date of Contact</b>
Name: [ ]	Address: [ ]	88-mm-yyyy
Email: [ ]	Phone: [ ]	
Name: [ ]	Address: [ ]	88-mm-yyyy
Email: [ ]	Phone: [ ]	
Name: [ ]	Address: [ ]	88-mm-yyyy
Email: [ ]	Phone: [ ]	
Name: [ ]	Address: [ ]	88-mm-yyyy
Email: [ ]	Phone: [ ]	
Name: [ ]	Address: [ ]	88-mm-yyyy
Email: [ ]	Phone: [ ]	
Please attach copies of communication with suppliers (e.g. emails to and from suppliers)		
And ECA, if applicable.		

<b>In case of fuel oil supply disruption only:</b>				
Port name where vessel was scheduled to receive compliant fuel oil: [ ]				
Name, email address, and phone number of the fuel oil supplier scheduled to deliver (and if now reporting the non-availability): [ ]				
<b>Operational constraints, if applicable</b>				
Describe any operational constraints that prevented using the compliant fuel oil available at a port (for example, viscosity or other fuel oil parameters): [ ]				
Specify steps taken, or to be taken, to resolve these operational constraints that will enable compliant fuel use: [ ]				
Describe availability of compliant fuel oil at the first port-of-call in [country name], and plans to obtain it: [ ]				
If compliant fuel oil is not available at the first port-of-call in [country name], list the lowest sulphur content of available fuel oil(s) or the lowest sulphur content of available fuel oil at the next port-of-call: [ ]				
If a vessel owner or operator has submitted a Fuel Oil Non-Availability Report to [country name] in the previous 12 months, list these below and provide details on the dates and ports visited while using non-compliant fuel oil:				
Report	Date	Port	Type of fuel	Comments
[ ]	88-mm-yyyy	[ ]	[ ]	[ ]
[ ]	88-mm-yyyy	[ ]	[ ]	[ ]
[ ]	88-mm-yyyy	[ ]	[ ]	[ ]
[ ]	88-mm-yyyy	[ ]	[ ]	[ ]
[ ]	88-mm-yyyy	[ ]	[ ]	[ ]
Master name: [ ]		Vessel operator name: [ ]		
Local agent in [country name]: [ ]		Vessel owner name: [ ]		
Name and position of official: [ ]				
Email address: [ ]				
Address (street, city, country, postal/zip code): [ ]			Telephone number (~ 999-999-9999): [ ]	
Signature of Master		Print Name		Date (88-mm-yyyy)



# FONAR

- Standard format (RMI Form MI-112) for reporting fuel oil non-availability
- Consistency in addressing fuel oil non-availability situations
  - Flag / coastal Administration coordination
  - IMO Global Integrated Shipping Information System (GISIS) database
- Fuel oil non-availability guidance:
  - Section 5 of 2019 Consistent Implementation Guidelines
  - Contingency Measures (MEPC.1/Circ.881)



Source: AP

# ADDITIONAL EFFORTS

- Marshall Islands Quality Council meetings
- Issuance of updated policies and advisories
- Outreach meetings with shipowners
- Training of Administrator personnel and inspectors
- Utilization of industry guidance

# THANK YOU



[www.register-iri.com](http://www.register-iri.com)