



Risk Assessment Solutions

“Don’t Cure, Prevent”

Circular 01/02/15

Subject: Incineration of sludge in ECA Areas – Important issue!

Case: Some of our Clients have expressed uncertainty whether a vessel is permitted to incinerate sludge when travelling or trading in ECA areas.

In connection to our ‘**Don’t Cure, Prevent**’ policy and in order to assist our clients on their above voiced concerns, ‘**Prevention at Sea**’ would like to clarify as follows:

Vessels can incinerate their sludge when trading in ECA areas, provided that they are in accordance with the regulations set out in *MARPOL Annex VI, Regulation 16*. However, it is important to note that according to the ‘*The Helsinki Convention on the Protection of the Marine Environment of the Baltic Sea Area*’ adopted in 1992, the incineration of sludge or other waste within the Baltic is *prohibited*.

In continuation to the above comments, according to MEPC.219 (63), permission for incineration of the vessel’s sludge in ECA areas also depends on domestic regulations:

“.... shipboard incineration should not be undertaken when the ship is in port or at offshore terminal. Some ports may have domestic laws that specify additional air emission restrictions, particularly those near high population areas. The use of a shipboard incinerator may require permission from the port authority concerned.”

Also,” ... some incinerators may not be able to meet air pollution regulations imposed in some ports and harbours or by flag and coastal States when such matters are subject to their jurisdiction.”

We would also like to advise our clients that with regards to secondary control methods, guidelines in MEPC.184 (59) have been adopted for exhaust gas cleaning systems which operate by water washing the exhaust gas stream prior to discharge to the atmosphere. By using such arrangements, there would be no constraint on the sulphur content of the fuel oils as bunkered other than that given the system’s certification.

We remain at your disposal for any further clarification.

Sincerely,

Prevention at Sea