

**SEE WHAT HK GOVERNMENT Pass- the-Buck EPD HAD TO SAY below:**

CTA says: if HK Government can mandate the import and use of Euro V diesel in Hong Kong it can also control what standard of bunker fuel is imported here! All ships serving Baltic, North Sea and USA ports have twin tanks to comply with Emission Control Zone low sulphur fuel laws (0.1% from January 2015). Those ships also visit Hong Kong port and are carrying the low sulphur bunker fuel already.

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**Subject:** E(11/1515) : Port Strategy - A new dawn

Dear Mr Middleton,

Thank you for your messages of 23 and 26 June. The consolidated reply of EPD and the Marine Department (MD) is as follows.

**1. What is the actual fuel sulphur cap here?**

Ans. According to Regulation 29(1) of the Merchant Shipping (Prevention of Air Pollution) Regulation, the sulphur content of any fuel oil used on board ships in Hong Kong is not to exceed 4.5% m/m.

**2. How is this enforced for incoming vessels which refueled elsewhere?**

Ans. According to Regulations 33(4) and 34 of the Merchant Shipping (Prevention of Air Pollution) Regulation, all incoming ships of 400 gross tonnage or above and engaged in international voyage shall carry Bunker Delivery Notes (BDN) with the associated representative sample of the fuel on board. The BDN and the representative sample are subject to inspection by Government Surveyors.

**3. What samples are taken to ensure the ships are conforming to "grey smoke emissions instead of black smoke"?**

Ans. MD is currently using Ringelmann Chart for the identification of black smoke. If a ship emits smoke of or darker than Shade 2 for continuous 3 minutes, the emission is regarded as black smoke.

**4. Since these Charter member shipping lines have opted to switch to ULSD only at berth and not whilst sailing within Hong Kong waters what has Government done to seek their compliance whilst underway rather than just at berth?**

Ans. The Fair Winds Charter signatories have committed themselves to switching their vessels to 0.5% sulphur fuel when at berth. While sailing underway within HK waters, these vessels must meet the sulphur limit requirement stipulated under MARPOL Annex VI. **As mentioned, since China has not designated its waters (including that of Hong Kong) as an Emission Control Area, there is no vehicle for Hong Kong to "require" operators to use fuels of more stringent specifications.**

**5. What is the sulphur content of bunker fuel supplied for refueling in Hong Kong?**

Ans. It must be below 4.5% and is usually in the range of 3.5% - 4.0%. You may contact the local suppliers in the attached document for details or access the MD's website on the link provided for that document.

<http://www.mardep.gov.hk/en/msnote/pdf/oilsupreg.pdf> <<http://www.mardep.gov.hk/en/msnote/pdf/oilsupreg.pdf>>

**6. Hong Kong is supposed to be an independent territory for 50 years from 1997 is it not? We make our own laws do we not ? The EPD intends to designate Low Emission Zones for traffic on Nathan Road, Causeway Bay and Central so that only Euro 5 diesels / hybrids will be allowed to enter those areas. I see no difference with doing the same for HK waters – either meet the relevant standards or do not enter our waters or be fined if you do. Using "China did not do it" is a lame duck reply more worthy of Donald Tsang than a body supposed to be looking after the air quality here , in this 50 year independent SAR.**

Ans. Under MARPOL Annex VI, there are general requirements on the sulphur content of any fuel oil used on board ships. There is also a mechanism for member states of the International Maritime Organization (IMO) to apply for designating its waters as an Emission Control Area (ECA), within which the requirements are more stringent than the general requirements. This mechanism is not mandated for all member States to designate its waters, in whole or in part, as an ECA. **As a matter of fact, Hong Kong is an associate member of IMO, not a full member (member state) and thus cannot file an application for ECA designation by Hong Kong itself.**

Best regards,  
Tony YT Lee

## BowTie and frequent flyer Edward Yau's legacy for Hong Kong



<http://hedleyindex.sph.hku.hk/home.php>

<http://shipandbunker.com/news/world/711143-hong-kongs-ships-most-significant-source-of-sulfur-dioxide-pollution>

### Hong Kong's Ships Most Significant Source of Sulfur Dioxide Pollution

Tuesday January 15, 2013



Chief executive Leung Chun-ying is expected to introduce new maritime pollution rules **Ships produced more sulfur pollution in Hong Kong than power plants in 2011**, according to the [South China Morning Post](#). Quoting soon-to-be released government data, Secretary for the Environment **Wong Kam-sing** said ships, **already the biggest emitter** of nitrogen oxides and suspended particles, became the most significant sources of sulfur dioxide as well. Hong Kong has cracked down on power plants since 2010, adding pollutant-removing scrubbers, but marine pollution has increased. Chief Executive Leung Chun-ying is expected to announce new plans next week to reduce emissions from ocean-going vessels, local ferries, and other ships. *"Voluntary schemes might not be the best - we might need something stronger"* Wong Kam-sing, secretary for the environment, Hong Kong Wong refused to say whether Leung would introduce mandatory requirements concerning marine pollution, but he said existing rules that offer compensation to ships switching to low-sulfur fuels are not enough. "Voluntary schemes might not be the best - we might need something stronger," he said. **Shipping companies have said the voluntary plan is difficult to accept because it gives a cost advantage to companies that don't sign on to it.** Wong said Hong Kong must address both marine and roadway pollution sources, and measures allowing **only low-emission buses on some busy corridors will be put in place in 2015.** **Ship & Bunker News Team** To contact the editor responsible for this story email us at [editor@shipandbunker.com](mailto:editor@shipandbunker.com)

<http://shipandbunker.com/news/world/446959-shippers-cite-barriers-to-low-sulfur-fuel-use-in-hong-kong>

### Shippers Cite Barriers to Low-Sulfur Fuel Use in Hong Kong



Tuesday January 15, 2013

Many shipping companies are concerned about the cost of using low-sulfur fuel in Hong Kong The cost of shifting to low-sulfur fuel is a factor in the low participation of **Hong Kong's** government initiative to promote fuel-switching at its port, [South China Morning Post reports](#). As part of efforts to reduce air pollution, since September 2012 the city-state's government **has offered rebates for ships that use low-sulfur fuel** during their port calls there, but the payments are said not to be enough to compensate for using the more expensive fuel. **The report said only 13 percent of the ocean going vessels calling in Hong Kong have registered for the Environmental Protection Department (EPD) scheme.** **"There is a significant financial commitment to switching fuel,"** said **Roberto Giannetta** of the **Hong Kong Liner Shipping Association**. A spokeswoman for **Evergreen Marine** said just one of its container ships was registered because of "cost saving considerations."

**Fair Winds Charter** More than 560 ships participate in the low-sulfur program launched in September, and about 18 shipping lines are part of the Fair Winds Charter, which requires them to use low-sulfur fuel "to

the maximum extent possible" over a two-year period starting at the beginning of 2011. Some shippers, including **APL** and **Hanjin Shipping**, have signed the Fair Winds Charter but have not yet registered any ships with the EPD incentive scheme. "*I know one prominent carrier who is switching fuel in Hong Kong, but does so quietly*" **Roberto Giannetta, Hong Kong Liner Shipping Association** Giannetta said some carriers also have non-financial reasons for not taking part in the program. "**I know one prominent carrier who is switching fuel in Hong Kong, but does so quietly without joining the charter or the government scheme because if they do so here in Hong Kong, they would face tremendous pressure in their home country to do the same,**" he said. "Yet there are specific reasons why they don't want to do that at home." Shipping lines that participate in the low-sulfur programs **have called for the Hong Kong and Guangdong, China governments to make use of low-sulfur fuel mandatory. Maersk Line recently said it would stop using low-sulfur bunkers in Hong Kong unless the government regulates its use to stop shippers who don't switch getting a cost advantage.** **Ship & Bunker News Team** To contact the editor responsible for this story email us at [editor@shipandbunker.com](mailto:editor@shipandbunker.com)

## Marine Air Pollution in Hong Kong – Clear the Air

Watch the video and see where 1/2 of our daily toxic sulphur dioxide pollution comes from!

It seems the Marine Department's Ringelmann chart is locked up in a dark room and the spotters are on holidays for the past 10 years. Here is the video link: <http://vimeo.com/55450426>

Then sign the petition to ask our Government to get our waters designated by China as an Emissions Control Area (ECA)

<http://hongkongpollutionwatch.blogspot.hk/2012/12/sign-this-petition-to-stop-vessel-smoke.html>

### [IMO | North American emission control area comes into effect on 1 ...](#)

[www.imo.org](http://www.imo.org) ›

31 Jul 2012 – The North American **Emission Control Area** (ECA), under the International Convention for the Prevention of Pollution from Ships (MARPOL), ...

[www.imo.org](http://www.imo.org) › ... ›

These controls divide between those applicable inside **Emission Control Areas (ECA)** established to limit the emission of SOx and particulate matter and those ...

[www.imo.org](http://www.imo.org) › ... ›

Annex VI Regulations for the Prevention of Air Pollution from Ships establishes certain sulphur oxide (SOx) **Emission Control Areas** with more stringent controls ...

### [Sulphur Emission Control Area - Wikipedia, the free encyclopedia](#)

Sulphur **Emission Control Areas** (SECA) are a sea areas where there are stricter requirements Following agreement at IMO and incorporation into European law, the Baltic Sea became the first fully implemented SOx **Emission Control Area** in August 2006. 9 Dec 2012 – In Resolution MEPC.190(60), the IMO Marine Environment Protection Committee (MEPC) adopted amendments to MARPOL Annex VI

### [IMO | Special Areas Under MARPOL](#)

Annex VI Regulations for the Prevention of Air Pollution from Ships establishes certain sulphur oxide (SOx) **Emission Control Areas** with more stringent controls