

FOWEY HARBOUR COMMISSIONERS



LOCAL NOTICE TO MARINERS

LNTM 2020/07

Air Quality & Exhaust Gas Cleaning Systems

Mariners attention is drawn to the Fowey Harbour Commissioners' policy regarding air quality and exhaust gas cleaning systems (see attached).

The discharge of wash water from exhaust gas cleaning systems (scrubbers) is prohibited within the Fowey estuary.

Harbour Master
5 May 2020

Distribution:
Pilots
Agents
Masters of FHC craft
Pilot Boatmen
Notice Boards
Website

CCTV, VHF and Radar surveillance is in operation in Fowey Harbour.

Recorded footage and audio may be used in evidence to prosecute byelaw offenders.



Fowey Harbour Commissioners

Air Quality Strategy & Open Loop Scrubber Policy

Introduction

Air quality has been identified as one of the highest risks to human health in the United Kingdom. Although air quality has been improving in recent years, emissions of NO₂ from international maritime shipping are projected to increase to the same level as land-based sources.

In 2019, the UK Government published its Clean Air Strategy and Clean Maritime Plan, national policies that apply to all major ports with the aim of introducing plans to reduce emissions across the ports and associated waterways. The Department for Transport required all large ports (those handling over 1m tonnes of cargo per year) to produce a Port Air Quality Strategy. Although the Port of Fowey falls below these criteria, Fowey Harbour Commissioners (FHC) recognise the importance of air quality and have produced this strategy document to outline their policy on air quality and in particular the use of exhaust gas emission cleaners (scrubbers).

Fowey is a busy commercial port handling in the region of 450,000 tonnes of cargo each year, the primary cargo is china clay but other cargoes such as rock salt and aggregate are handled. The loading jetties are leased by IMERYS Minerals Ltd and Fowey Harbour Commissioners provide the associated pilotage and towage services. Fowey is also a popular destination for cruise ships, welcoming approximately 6 ships per year.

Maritime Emission Control Areas

The International Maritime Organisation (IMO) and UK Government are working to improve air quality on a national and international scale. As a result of MARPOL Annex VI, several Emission Control Areas have been established across the globe with stricter control measures on sulphur or other airborne emissions from ships. The South West region, including Fowey, lies within the English Channel Sulphur Emission Control Area (SECA).



Sulphur Fuels & Exhaust Gas Cleaning Systems (Scrubbers)

Ships transiting through the English Channel and into ports in this SECA area, must burn fuel with a sulphur content lower than 0.1%. Where ships cannot switch to the low sulphur fuel, they are required to use other methods, such as exhaust gas scrubbers, to achieve the same effect.

The Maritime and Coastguard Agency's (MCA) position is that the following options are available to comply with the IMO 2020 Sulphur emissions cap in coastal waters:

- i. Use ultra-low Sulphur fuel
- ii. Use closed-loop exhaust gas scrubbing systems.

While exhaust gas scrubbers reduce the atmospheric emissions of a number of pollutants, wash water discharges from scrubbers operated in an open loop system may have environmental and ecological impacts, of particular concern are discharge of heavy metals, polyaromatic hydrocarbons (PAHs), nitrogen oxides (NO_x) and the acidification of receiving waters and sediments. Some consider that this activity constitutes deposition of waste into the marine environment, an activity which would not be considered permissible under the Marine and Coastal Access Act 2009 (as amended).

Currently there is limited assessment of the long-term environmental impacts of the use of exhaust gas scrubbers and the impacts of discharge water. However, given the potential for impact on sensitive ecosystems, and the existence of designated sites within the Fowey estuary. The Fowey Harbour Commissioners' policy is to prohibit exhaust gas scrubber wash water from being discharged within the Fowey estuary.

Policy Review & Implementation

Fowey Harbour Commissioners will continue to review International and UK Government Policy in relation to Air Quality and this policy will be reviewed regularly. FHC will continue to work alongside the jetty operator IMERYS Minerals Ltd in the implementation of this policy.

This policy is promulgated by a Local Notice to Mariners (LNTM) and applies to all vessels within the FHC area of jurisdiction. Vessel Masters are responsible for complying with this policy.

Reviewed April 2020