



**Questions**

**Responses**

(As of February 2020)

Will compliant bunkers be available in your jurisdiction?

1

Kindly note that VLSFO is available either in Gibraltar, Ceuta and Algeciras. CEPSA, VILMA, PENINSULA, MINERVA, REPSOL grants very good quality product.

- REPSOL and CEPSA carried out in their own refineries at Spain
- PENINSULA & MINERVA Fuel oil will be obtained from natural blending with cutters.
- VILMA Product will be bought in VLSFO cargoes, so Vilma will purchase final product with no blending from their side. Method of getting the VLSFO will depend on cargo shipper
- Also all of them secure stock of MGO
- GIBOIL delivering only MGO

Which government body or organization issues fines for sulphur violations?

2

Habour Master at Algeciras  
 -Port Authorities at Gibraltar

Before sanction is applied, it will be taken into consideration following points:  
 -% Of Sulphur content above the limit used  
 -Period of time that vessel has not been complying with it  
 -Vessel proves that they wanted to follow the regulation but finally did not  
 -Missing BDNs  
 -Have not communicated with authorities involved in case of engine problems and the unavailability of getting bunkers complying the regulations (FONAR)

Fines have not been disclosed but they will have all the above on account to decide final amount.

What is the estimated potential value of fines?

3

As explained in point 2 unable to ascertain cause they will decide the fine considering a range of point. For instance, will not the same fine for a vessel burning IFO 1.1 % or if vessel is burning 3.5%

Is there a possibility of criminal action for sulphur violations?

4

We have not received such input never form authorities.

Can a ship be detained for violations?  
 If so, will a club LOU be accepted to secure its release?

5

Vessels can be detained till settlement of fine or providing a guarantee in front of authorities. Transcoma can assist by providing legal support locally both at Spain or Gibraltar.

Is it possible to appeal fines?

6

Yes, you can appeal, but according our experience in previous cases is quite difficult to change the authority's decision. Asmentioned before we can provide support on this matter as well.

What contingency measures are available for ships carrying non-compliant fuel.

7

Attached presentation about how IMO 2020 will affect our area.

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