



## Questions

## Responses

(As of February 2020)

Will compliant bunkers be available in your jurisdiction?

1

Yes, compliant bunkers will be available in our jurisdiction.

Which government body or organization issues fines for sulphur violations?

2

Ministry of transport, infrastructure and water management / Environment inspection as well as the Port Authorities.

What is the estimated potential value of fines?

3

The potential value of fines is maximized to €800.000 - The actual value of the fine will be a court decision.

Is there a possibility of criminal action for sulphur violations?

4

According to the Dutch Law, sulphur violations is considered to an economical offense.

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

5

Yes, a ship can be detained for violations. A LOU could be accepted, however its subject case to case.

Is it possible to appeal fines?

6

It is possible to appeal fines.

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

7

No measurements are taken, as long as the ships are not using the non-complaint fuel they have board.

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