



## Questions

## Responses

(As of February 2020)

Will compliant bunkers be available in your jurisdiction?

1

Our company does not supply fuel. Compliant fuel can be obtained in Vladivostok, Nakhodka, Vostochny, quite a lot of companies can do it.

Which government body or organization issues fines for sulphur violations?

2

The fines are issued by Federal Service for Supervision of Natural Resources / Transport prosecutor's office.

What is the estimated potential value of fines?

3

Fines include economic component, which depends on the severity and extent of the violation, the frequency of non-compliance, the assessment of harm and equipment performance.

Is there a possibility of criminal action for sulphur violations?

4

Criminal action for captain and detain of ship for sulphur violations are possible.

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

5

Criminal action for captain and detain of ship for sulphur violations are possible.

Is it possible to appeal fines?

6

I think it is possible, since it is expected that amendments to Appendix VI of MARPOL Appendix VI Annex VI to the Procedures for checking marine fuel samples for compliance with requirements of MARPOL AppVI to MARPOL (rule 18.8.2 or 14.8 ) will be adopted in spring 2020.

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

7

Carrying is possible until 01/03/2020 don't use fuel with sulphur more than 0.5%.

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