Shipping Lines/Agents Readiness & Challenges Towards Implementing MARPOL Annex VI
(Kenya Ships Agents Associations (KSAA))

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ON BEHALF OF THE KENYA SHIPS AGENTS ASSOCIATIONS (KSAA)
“IT IS NOT THE STRONGEST OF SPECIES THAT SURVIVES, NOR THE MOST INTELLIGENT THAT SURVIVES.

IT IS THE MOST ADAPTABLE TO CHANGE” - Charles Darwin.
Kenya Ships Agents Association (KSAA)

- Established in the early 1970’s
- Objectives of KSAA are:
  - To promote of interests of shipping companies using Mombasa port;
  - To consult and agree on common policy matters affecting the interests of ship owners using Mombasa port; and
  - To place before the Government and other public bodies the view of the members on such matters.
- Member of Federation of National Associations of Ship Brokers and Agents (FONASBA).
KSAA ....(contd)

• We share a common interest in mitigating adverse climate factors especially in the maritime sector and are willing to collaborate to bring it about.
• Though this project is new to us, shipping agents will partner with other stakeholders and groups to bring Annex IV into realization.
• Strengths and attributes of various private ships agents will be a key driver towards successful implementation of Annex IV changes through out the African region.
• These dynamics come with challenges for the shipping players considering that currently there is more than 95% non compliance in Africa.
However, Most ships visiting African ports are registered elsewhere either in Asia, Europe etc

Meaning they are compliant to Annex VI based on their port of registrations and frequent ports of calling.

Shipping lines and shipping agents in general are ready for the implementation of the Annex VI of MARPOL Convention

Regardless of the efforts, we cant fully comply without full support in-terms of human capacity building and infrastructure.
Ship Owners willingness to comply with Ann. VI.
Ships Emissions.

1. Low sulphur MDO are considerably more expensive to ship owners.
2. Availability of quality fuels locally in compliance with Annex IV ie with low sulphur & carbon content locally
4. Penalties and enforcement of the non-compliance
5. Legislative frame for the ships below 5000GRT –there is still a gap in most African jurisdictions including Kenya
6. Ship fuel oil consumption data collection and reporting not clear to some members hence
Other Emission contributions

Cargo handling equipment

- CO$_2$e
- HC
- CO
- SO$_x$
- NO$_x$
- DPM
- PM$_{2.5}$
- PM$_{10}$

Emission contributions within source category

- Container
- Break-Bulk
- Dry Bulk
- Cruise
- Liquid
- Auto
Ships Categories

Emission contributions within source category

Ocean-going vessels

- CO$_2$e
- HC
- CO
- SO$_x$
- NO$_x$
- DPM
- PM$_{2.5}$
- PM$_{10}$

- Containership
- Tanker
- Cruise
- General Cargo
- Reefer
- Auto Carrier
- Bulk
- Other
Jurisdiction

- There are overlaps between the jurisdiction of flag, port and coastal states with regards to the implementation of MARPOL in practice.
- International, national and customary maritime regulations may be subject of application to one ship. Therefore unique question is where does the jurisdiction over ships fall in such instances.
- Jurisdiction over ships in the implementation of MARPOL lies with the flag state when in high seas but the port state can only intervene once a ship calls to the jurisdiction of its ports.
- Further, signatory states are responsible for implementing and enforcing the domestic legislations which gives effect to the convention.
- IMO does not have implementation and enforcement powers but relies on members states therefore the lack of incentives by the flag states to impose and enforce the pollution control rules has significantly affected. There are no punitive measures for states who fail to implement MARPOL obligations.
COLD IRONING

Proposed “Cold Ironing”

SHIP

Onboard Connector

Control Panel

100v

440v

SHORE SIDE

Frequency/Transformer Convertor

6 KVA

Power Source
Micro Turbine / Grid Power / Hybrid Heat Recovery System
Involves the use of shore power when a vessel is dockside, as opposed to using onboard diesel generators. Estimates of potential reduction is defined by:

1. Number of berths with dockside power
2. Number of compatible ships making frequent visits to those same docks ie retrofitted ships and
3. The average duration of dockside dwelling time

It is assumed that diesel generators on the ships will be switched off most of the time, thus reducing dwelling emissions to near zero.
Shore Power-Cold Ironing

• Energy efficiency/voltage stability. How efficient is the shore power ie solar or electricity? In case of power failures who will be responsible for delays?
• Capital costs (building ships with modern specs) ie electric and hyghhbrid vessels
• Different tariffs on the various continents ports visa vis business competitiveness.
• Highly digitized and automated ships means less but high skilled/trained crew members.
• Costs of using ships generators visa vis shore power; cheap power will attract more users.
Improvement Measures.

• The regulator must strive to guide/sensitize industry players through these period as well as facilitate them in this process of change.
• Collaboration is paramount towards success of the implementation of this project
• Manage the risks of implementation of this project as a continent and prepare the work force and organizations for impact
• Develop a working Memorandum of understanding between the Kenya Maritime Authority and the National Environmental Management Authority-NEMA similar model to the US Coast Guards & US Environmental Protection Agency regarding the enforcement of Annex VI setting modalities on coordination and enforcement.
• Incentives for the compliant ship players eg financing cleaner ships; tax exemptions, tariff incentives etc an environmental agreement can be signed.
• Private companies transparency on enforcement as well as initiatives to foster innovation in enforcement technology.
Contd’

• The infrastructure improvement by the Ports Authorities & Maritime Regulators. Number of berths with dockside power must be improved.
• IMO and state authorities to encourage pollution mitigations private organizations of ships owners collaborating to support green shipping similar to the Trident Alliance etc.
Data sources

1. StarCrest consulting group, LLC
2. Lloyds Register
Acronyms & Abbreviations

1. SECA - Sulphur Emission Control Areas
2. IMO - International Maritime Organization
3. NOx - Nitrogen Oxide
4. COx - Carbon Oxides
5. KMA – Kenya Maritime Authority
6. KPA - Kenya Ports Authority
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