

# FONASBA MEMBERSHIP ENQUIRY



## ENQUIRY RESPONSE FORM

<b>ORIGINATING ASSOCIATION:</b>	<b>Israel Chamber of Shipping</b>
<b>ENQUIRY DETAILS:</b>	<p>A) <i>Is sludge removal from ships mandatory in your country as per the MARPOL Convention? Yes/No</i></p> <p>B) <i>Whether mandatory or voluntary, kindly advise:</i></p> <ol style="list-style-type: none"> <li><i>Who provides the service, the port or terminal operator or a subcontractor?</i></li> <li><i>How is the sludge collected, by road tanker, barge or other means? If the latter, please provide details</i></li> <li><i>Is the cost of removal based just on the volume/tonnage of sludge removed or does it include components for other factors such as the size or type of vessel, the time taken to collect or similar?</i></li> </ol> <p><i>Is there a fixed minimum charge for the service? If so is it based on a minimum quantity, a set time or combination of both?</i></p>
<b>REPLY TO:</b>	<a href="mailto:admin@fonasba.com">admin@fonasba.com</a>
<b>COPY REPLY TO:</b>	
<b>CLOSING DATE FOR REPLIES:</b>	<b>26<sup>th</sup> February 2019</b>

### RESPONDING ASSOCIATION COMMENTS: (Please include any attachments)

Argentina	<p>A) No</p> <p>B)</p> <ol style="list-style-type: none"> <li>Subcontractor/ private company</li> <li>Barge or truck (subject to port of call)</li> <li>Basis volume/tonnage of sludge</li> <li>Yes, there is minimum charge basis on minimum quantity</li> </ol>
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Bahrain	<p>A) No</p> <p>B)</p> <ol style="list-style-type: none"> <li>1. Subcontractor</li> <li>2. By road tanker alongside berth at commercial port</li> <li>3. Cost is depending on nature of sludge/ time taken for collection and disposal etc</li> <li>4. Price to be decided based on actual requirement only.</li> </ol> <p>Further, permission from Ministry of Environment is required in advance after providing them with sample of the sludge. The permission process can take about 3-4 working days and sludge is permitted to receive the trucks only after getting the required approval.</p>
Brazil	<p>A) No. It is ship's convenience.</p>
Croatia	<p>A) Sludge disposal is not mandatory, but always subject to sufficient dedicated storage capacity as per MARPOL Convention.</p> <p>B)</p> <ol style="list-style-type: none"> <li>1. Subcontractor</li> <li>2. Truck or barge</li> <li>3. Based on volume/tonnage of sludge removed.</li> <li>4. None.</li> </ol>
Cyprus	<p>The sludge is collected by road tanker or special barge (as the case may be) and the services of collection and their administration are effected by private companies duly licensed by the Cyprus Ports Authority.</p>

Denmark	<p>A) Denmark has signed the MARPOL Convention and hence the ports are obliged to have reception facilities to receive sludge upon vessels request.</p> <p>B)</p> <ol style="list-style-type: none"> <li>1. We have checked with members in the three Danish main ports in Kalundborg, Aarhus and Fredericia and learned that these ports outsource the service to collect sludge to third party vendors.</li> <li>2. The sludge is mostly received by road tankers.</li> </ol> <p>3+4. The ports accept certain volumes covered by its port dues applicable to vessels, and pay the third party vendor for that part. However, if the vessel require additional volumes of sludge discharged they must pay for such additional volumes. Some ports also have requirements to the vessels pumping capacity to discharge the sludge and apply extra costs if the vessel cannot meet the pumping requirements.</p> <p>In some situations, the vessel may have lack of prudent pumping capacity and thus may order the Sludge to be sucked from the vessel by the road tanker. The vessel will then pay extra for such a service. The vessel pays potential extra costs directly to the third party vendor.</p>
Dubai	<p>A) No</p> <p>B)</p> <ol style="list-style-type: none"> <li>1. Subcontractor</li> <li>2. Road Tanker</li> <li>3. The time taken to collect or similar</li> <li>4. Combination of both</li> </ol>
France	<p>A) Yes. Unless ship master provides an order of removal scheduled in another EU port and/ or proves to have enough storage capacity to wait until next port cal.</p> <p>B)</p> <ol style="list-style-type: none"> <li>1. It depends of ports, but mainly subcontractors.</li> <li>2. Road tankers or barges.</li> <li>3. Removed sludge volume/tonnage.</li> <li>4. No. Charges as per negotiation with subcontractors. In some ports, along with port tax, a fee is applied if vsI does not remove sludges. If she does, then fee is not applied.</li> </ol>

Hungary	<p>A) Yes</p> <p>B)</p> <ol style="list-style-type: none"> <li>1. Subcontractor of the state</li> <li>2. Tanker and barge as well</li> <li>3. Based on CBM</li> <li>4. No</li> </ol>
India	<p>A) No.</p> <p>B)</p> <ol style="list-style-type: none"> <li>1. Voluntary. At most of the ports, it is provided by private subcontractors either appointed by agents.</li> <li>2. Depends upon location of the berth: At anchorage always by barge, at berth by road tankers.</li> <li>3. The cost of removal based just on the volume/tonnage of sludge removed. No other components/factors taken into account.</li> <li>4. Generally, there is always fixed cost basis per cubic meter/per ton. However, minimum quantity is differ basis port to port due to difference of logistical arrangements.</li> </ol>
Italy	<p>A) Yes, in Italy is mandatory as per the MARPOL Convention.</p> <p>B) Is mandatory</p> <ol style="list-style-type: none"> <li>1. A subcontractor provides the service</li> <li>2. The procedures change from port to port</li> <li>3. The cost change from port to port</li> <li>4. The charge for the service change from port to port</li> </ol>

Japan	<p>Container ships</p> <p>A) Yes</p> <p>B) Mandatory per MARPOL Convention</p> <ol style="list-style-type: none"> <li>1. Ship Yard on every 30 months</li> <li>2. Washing(High Pressure Cleaning)</li> <li>3. Depends on size or type of vessel</li> <li>4. Depends on contract</li> </ol> <p>Bulk ships</p> <p>A) Not compulsory, at ship convenience only</p> <p>B) Voluntary</p> <ol style="list-style-type: none"> <li>a. Subcontractor</li> <li>b. Either by tank truck or barge</li> <li>c. Based on volume in liter subject to tariff</li> <li>d. It is approx. 20-40kl if collection by barge</li> </ol>
Kenya	<p>A) Yes</p> <p>B)</p> <ol style="list-style-type: none"> <li>1) A private company/subcontractor</li> <li>2) If vessel is alongside is by Toad Tanker/ if vessel is at anchorage it is by Barge</li> <li>3) Cost is by volume of the sludge</li> <li>4) Cost is determined by quantity</li> </ol>
Malta	<p>A) No</p> <p>B) Not mandatory</p> <ol style="list-style-type: none"> <li>1. Subcontractor</li> <li>2. Generally, by road but could be removed by barge also upon request.</li> <li>3. Cost is the same, calculated on a per CBM basis.</li> <li>4. There is a minimum quantity of 5cbm</li> </ol>
Morocco	<p>A) Yes, as per MARPOL convention.</p> <p>B) Mandatory</p> <ol style="list-style-type: none"> <li>1. Authorized private contractors</li> <li>2. by road tanker</li> <li>3. Costs are per road tanker voyage having a capacity of about 25 cbm.</li> <li>4. Minimum cost is one voyage irrespectively of quantity involved.</li> </ol>

Netherlands	The following link is showing everything related to sludge removal in the Port of Rotterdam: <a href="https://www.portofrotterdam.com/en/shipping/sea-shipping/other/ships-waste-from-seagoing-shipment">https://www.portofrotterdam.com/en/shipping/sea-shipping/other/ships-waste-from-seagoing-shipment</a>
Portugal Attachment	<p>A) No</p> <p>B)</p> <ol style="list-style-type: none"> <li>1. Private Company</li> <li>2. Road Tanker</li> <li>3. Attached Tariff</li> <li>4. Attached Tariff</li> </ol>
Russia	<p>A) Yes.</p> <p>B)</p> <ol style="list-style-type: none"> <li>1. Port authority has a few subcontractors.</li> <li>2. It's collected by barge</li> <li>3. The cost is included in environment due which is payable every vessel call. The environment due depends on vessel GT only.</li> <li>4. Pls see point 3.</li> </ol>
Slovenia	<p>A) VOLUNTARY as per PSC</p> <p>B)</p> <ol style="list-style-type: none"> <li>1. PORT OF KOPER see <a href="http://www.luka-kp.si">www.luka-kp.si</a></li> <li>2. By Road Tanker</li> <li>3. Based on Volume</li> <li>4. See Tariff on <a href="http://www.luka-kp.si">www.luka-kp.si</a></li> </ol>

Turkey

A) Sludge removal is mandatory due which we as agent have to add delivery expenses to vessels final DA. On the other hand to discharge sludge, garbage or bilge water is decision of Masters but due have to be paid even waste's discharge or not.

B)

1. Service provider is changing port to port but service is given by Regional Municipality but at some regions Municipality give service to private 3<sup>rd</sup> parties but the expenses are the same in all Turkey.
2. Sludge collection is changing port to port but usually by barge.
3. As mentioned item A this due is mandatory and have to add vessels final DA even if vessel discharge or not. This "base Fee" includes few m3 as per vessels's GRT as you can see table below. If vessel discharge more than "base fee" quantities than amounts at Part to add to invoice per m3

Waste Delivery Fees (part 2 costs) are 25% surcharged during AOH/Weekends/National holidays and 30% surcharged for disposals at anchorage.

GRT	Base Fee (€)	Part 1			Part 2		
		Qty of waste can be delivered within base fee, no extra cost (m <sup>3</sup> )			Waste delivery fee (€/m <sup>3</sup> ) When exceeding the qts in base fee		
		MARPOL (annex I bilge wtr, w. oil, sludge)	MARPOL (annex IV)	MARPOL (annex V)	MARPOL (annex I) slop, dirty ballast	MARPOL (annex IV) (bilge wtr, w. oil, sludge)	MARPOL (annex V)
TOTAL							
0-1000	80	1	2	1			
1001-5000	140	3	2	1			
5001-10000	210	4	3	2	1,5	35	15
10001-15000	250	5	4	2			25

4. Item 3 also have the answer of this question

UK	<p>Sludge removal is not mandatory but ports and terminals have to allow the vessel to do it if they are full / in danger of being full. Ports and terminals can refuse to allow if the vessel has sufficient storage space to safely transit to their next port.</p> <p>There is no fixed charge. It is the responsibility of the ship (via their agent) to make the arrangements. The agent must check what the port or terminal permits.</p> <p>Road tankers and barges are both used depending on the port - every port is different. Some tanker and container terminals do not allow road tankers on the jetty and most tanker terminals do not allow this operation whilst cargo operations are underway. It is easier for dry cargo vessels as road tankers can generally get close to the ship.</p> <p>There is no minimum charge etc - this is a commercial operation and as such all variables would need to be considered - distance, time of operation, length of operation, restrictions and quantity.</p> <p>The port or terminal does not profit from this operation in any way.</p> <p>Some ports in the UK do however charge for anti-pollution response as part of their port tariff - usually a nominal amount (£20-£30) charged to every ship visit. This contributes to their anti-pollution prevention costs.</p> <p>Some UK ports also charge for having a boat on station monitoring the operation - this is mandatory for any bunkering operations and sludge removal is classed as the same due to hazards.</p> <p>Most ports or terminals in the UK would require pre notification and approval before allowing such operations.</p>
Uruguay	<p>A) In Uruguay, the MARPOL Convention is law</p> <p>B)</p> <ol style="list-style-type: none"> <li>1. Through a specialized operator licensed by the Port Administration</li> <li>2. By tank trucks</li> <li>3. The cost is based on the tonnage removed</li> <li>4. There is a minimum charge of 5 tons</li> </ol>



USA	<p>The answer to your question may vary from port to port. Here's information from the Maryland Port – Baltimore</p> <p>A) Yes</p> <p>B)</p> <ol style="list-style-type: none"><li>1. Subcontractor</li><li>2. Road truck, Barge at anchorage</li><li>3. Price per gallon plus labor and fuel</li><li>4. Price depends on volume</li></ol> <p>Average price - \$8,000 - \$12,000</p> <p>Fixed Minimum - \$2,000 Weekday and \$3,000 Weekend</p>
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