

Prohibition on the Discharge of Exhaust Gas Scrubber Wash Water

The purpose of this Notice to Mariners is to describe and communicate Dublin Port Company's Standard Operating Procedure SOP-HBR-ENV-010 with regard to the prohibition of discharge of exhaust gas scrubber wash water. This procedure applies to all vessels within the Dublin Port jurisdiction, that being the waters from the Matt Talbot Memorial Bridge eastwards to a line from the Baily Lighthouse through the North and South Burford buoys and through Sorrento Point.

1.0 References

Habitats Directive (Directive 92/43/EEC) & Water Framework Directive

2.0 Responsibilities

- 2.1 The Harbour Master is responsible for maintaining this SOP and promulgating the SOP to shipping via Notice to Mariners.
- 2.2 Vessels Masters are responsible for complying with this procedure

3.0 Procedure

- 3.1 The recent tightening of the fuel sulphur limits has promoted the use of exhaust gas scrubbers to reduce sulphur emissions to air. While exhaust gas scrubbers reduce the atmospheric emissions of a number of pollutants, wash water discharges from scrubbers operated in certain modes may have significant environmental and ecological impacts. Of particular concern are the emissions of heavy metals, polyaromatic hydrocarbons (PAHs), nitrogen oxides (NOx), and the acidification of receiving waters.
- 3.2 A number of these pollutants are identified as priority substances requiring the introduction of control measures to progressively reduce their discharge as set out in Article 16 of Directive 2000/60/EC (The Water Framework Directive), and for which environmental quality standards have been set in Directive 2008/105/EC (The Environmental Quality Standards Directive).
- 3.3 Currently there is no assessment of the long term environmental impacts of the use of exhaust gas scrubbers. However, given the potential for impact on sensitive ecosystems, and the abundance of Natura 2000 sites designated in accordance with the requirements of the Habitats Directive (Directive 92/43/EEC) in Dublin Bay and its environs, **it is the policy of Dublin Port Company that wash water from exhaust gas scrubber systems shall not be discharged to surface waters within the jurisdiction of Dublin Port Company.** This is in keeping with the Precautionary Principle, as detailed in Article 191 of the Treaty on the Functioning of the European Union, aimed at ensuring a higher level of environmental protection through preventative decision-taking in the case of risk.

Captain Michael McKenna | Harbour Master | 01 January 2024