
From: [redacted]@mobilit.fgov.be>
Sent: 13 June 2019 12:36
To: [redacted] donald.gregory@egcsa.com
Cc: [redacted]
Subject: RE: Request for information regarding discharges from marine Exhaust Gas Cleaning Systems (ships scrubbers) -

If by any chance you would be at IMO today or tomorrow (until lunchtime), don't hesitate to approach me, so I could explain you and show on the navigational chart. With regards to the entry to the river Schelde, it is easy: the beginning of the river Schelde are Netherlands waters, when then entering Belgian waters, these are already inland waters and so open loop scrubbers are prohibited.

Kind regards,
[redacted]

Sent: donderdag 13 juni 2019 13:11

To: [redacted]@mobilit.fgov.be

Cc: [redacted]

Subject: RE: Request for information regarding discharges from marine Exhaust Gas Cleaning Systems (ships scrubbers) -

Many thanks [redacted]

It would be very much appreciated if an appropriate member of the team at Vlaamse Milieumaatschappij (Flanders Environment Agency) could advise regarding the policy on discharges from scrubbers in ports and inland waterways and where the geographic limits of the regulation begin

Thanks again

From: [redacted]@mobilit.fgov.be>

Sent: 13 June 2019 11:44

To: [redacted] donald.gregory@egcsa.com

Cc: [redacted]

Subject: RE: Request for information regarding discharges from marine Exhaust Gas Cleaning Systems (ships scrubbers)

Dear [REDACTED]

In Dutch this is called the “gemiddelde laag laagwaterlijn” and this line is indicated on the nautical charts, although I don’t expect ships, equipped with scrubbers, to navigate that close to the beach. If I were to give you a free translation of the line it would be “average low low waterline”.

Hope this helps.

Kind regards,
[REDACTED]

Sent: woensdag 12 juni 2019 19:09

To: [REDACTED] @mobilit.fgov.be

Cc: [REDACTED]

Subject: RE: Request for information regarding discharges from marine Exhaust Gas Cleaning Systems (ships scrubbers)

Dear [REDACTED]

Many thanks for your advice. Just so that I am clear could you please confirm the definition of ‘(off the limit of the base line)’ including the relevant distance in nautical miles?

Your further advice would be much appreciated

B.Rgds

From: [REDACTED] @mobilit.fgov.be>

Sent: 24 May 2019 14:21

To: [REDACTED] donald.gregory@egcsa.com

Cc: [REDACTED]

Subject: FW: Request for information regarding discharges from marine Exhaust Gas Cleaning Systems (ships scrubbers)

Dear [REDACTED]

As per current national legislation in Belgium discharge of scrubber wash water is only allowed in coastal and open seawaters (off the limit of the base line) under the condition that the IMO-guidelines are met. Discharge from ships is not allowed in ports and inland waters.

The legal references are the following:

-Coastal and seawaters: Wet van 6 april 1995 betreffende de voorkoming van verontreiniging door schepen (omzetting Marpol). No additional notices have been published.

-Ports and inland waters: Wet van 26 maart 1971 op de bescherming van oppervlaktewateren tegen verontreiniging (omzetting kaderrichtlijn water in Vlaanderen). For further questions here, please contact the Vlaamse Milieumaatschappij [redacted]

Kind regards,



FOD Mobiliteit en Vervoer
Vooruitgangstraat 56
1210 Brussel
www.mobilit.belgium.be
info@mobilit.fgov.be

From: [redacted] @health.fgov.be>

Sent: vrijdag 24 mei 2019 10:12

To: [redacted] @mobilit.fgov.be>

Cc: [redacted]

Subject: TR: Request for information regarding discharges from marine Exhaust Gas Cleaning Systems (ships scrubbers)

Beste [redacted]

Zie hieronder het bericht [redacted] van de Exhaust Gas Cleaning Systems Association.
Kunnen jullie op zijn vraag antwoorden of hem helpen om het antwoord te vinden?
Alvast bedankt.

Mvg,




www.health.belgium.be | [redacted]



Spaar onze natuurlijke hulpbronnen door dit e-mailbericht niet nutteloos af te drukken.



Envoyé : jeudi 23 mai 2019 17:10

À : [redacted] @health.fgov.be>

Objet : Request for information regarding discharges from marine Exhaust Gas Cleaning Systems (ships scrubbers)

Dear [redacted]

I obtained your contact details from an online list of European National Maritime Authorities and do hope you are the correct person for my request.

The Exhaust Gas Cleaning Systems Association (<https://www.egcsa.com>) is currently compiling a world map of where the discharges from ships' Exhaust Gas Cleaning Systems (SOx scrubbers) are permitted or restricted together with any publicly available documents such as marine notices or website links that give further details.

We have known for quite some time that based on the EU Water Framework Directive Belgium does not permit any scrubber water discharges (amongst others) within 3 n.m. of the coast baseline. However we have been unable to find the relevant marine notice or website page, which can be cited as a verified reference for the EGCSA map.

We know the related legislation is "*Wet van 26 maart 1971 op de bescherming van de oppervlaktewateren tegen verontreiniging (Vlaams Gewest)*"- Law of 26 March 1971 on the protection of surface waters against pollution (Flemish Region), as amended, but are looking for the specific practical document(s) or web page(s) rather than the legal text.

Any help you can give regarding the documents or web pages (which do not need to be in English) would be most appreciated.

If you are not the correct person to ask, please accept my apologies and I would be most grateful if you could direct me to an appropriate contact

Many thanks and B.Rgds