In addition to progress made on a number of important issues, the International Maritime Organisation (IMO) at its recent Marine Environment Protection Committee (MEPC 73) listened to the concerns raised by INTERCARGO and others and offered a constructive way forward to potentially address them. It is critical, especially for the tramp sector, to ensure an effective implementation process for the 2020 Sulphur Cap regulation. The MEPC agreed to consider at its next sessions, concrete proposals on how to enhance the implementation of regulation 18 of MARPOL Annex VI, especially on reporting fuel oil quality and non-availability of compliant fuel oils, including the enhancement of GISIS modules for data collection and analysis.

INTERCARGO fully supports the Sulphur Cap and its implementation date of 1\textsuperscript{st} January 2020. However, INTERCARGO cannot ignore the safety issues that are most likely to arise with this important regulation and are obliged to voice our concerns, which relate to securing a robust level of safety of MARPOL and SOLAS compliant fuels. The successful, effective and orderly implementation of the regulation rests not only with ship operators but equally with the IMO Member States and with suppliers (involving oil refineries, bunker suppliers and Charterers) who need to secure the worldwide availability of safe compliant fuels - a particular problem for ships in the dry bulk tramp trades.

It is our firm belief, given the scale and challenges of the required transition, that consistent enforcement of the regulation is required. A uniform approach by Port State Control officers must apply equally to ships that will rely on the supply of compliant fuels and those opting to comply via alternatives methods, such as exhaust gas scrubber installation, with due consideration for the fact that considerable operational experience will need to be gained in early 2020 on compliance. Securing the safety of crews, ships, and cargoes and the protection of the environment are of paramount importance.

\textbf{About INTERCARGO:} The International Association of Dry Cargo Shipowners (INTERCARGO) is a voluntary non-profit association representing the interests of dry cargo vessel owners. Its first General Meeting took place in 1980 in London and it has had NGO consultative status at the International Maritime Organization (IMO) since 1993. INTERCARGO provides the forum where quality dry bulk shipowners, managers and operators are informed about, discuss and share concerns on key topics and regulatory challenges, especially in relation to safety, the environment and operational excellence. INTERCARGO promotes best practices in shipping and represents dry cargo shipping interests at IMO, other industry fora and the broader business context, basing its strategies on the principle of free and fair competition.