

25th September 2020

**CIRCULAR 033/2020**

**SULPHUR CAP 2020: REGULATION LIMITING OPEN LOOP  
SCRUBBERS SUSPENDED**

Dear All,

In our Circular 29/2020 we have informed about Disposition 15/2020 enacted by the Coast Guard who limited the use of open loop scrubbers as it was **forbidden to discharge its wash water (or any other scrubber which requires discharge of wash water) in all jurisdictional waters (including internal waters, territorial sea, contiguous zone and exclusive economic zone).**

However, on 24<sup>th</sup> September 2020, due to the Sanitary Emergency / Covid19 the Coast Guard enacted Disposition 22/2020, **leaving without effect the prohibition enacted under Disposition 15/2020 as from the date of its publication in National Gazette** (expected any moment now).

It seems that Disposition 15/2020 has not been repealed but its enforceability has been suspended in the context of the Sanitary Emergency (Covid19).

We shall continue monitoring this and will keep you posted. In the meantime, we remain at your disposal if clarification and/or additional information is needed.

Yours Faithfully,

Sebastián A. Trigub

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**This circular update Circulars 21/2020 and 29/2020.**

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