



Panel Discussion - IMO 2020



Camila Søgaard Hudson



Charlotte van Steenderen



Luis de San Simón



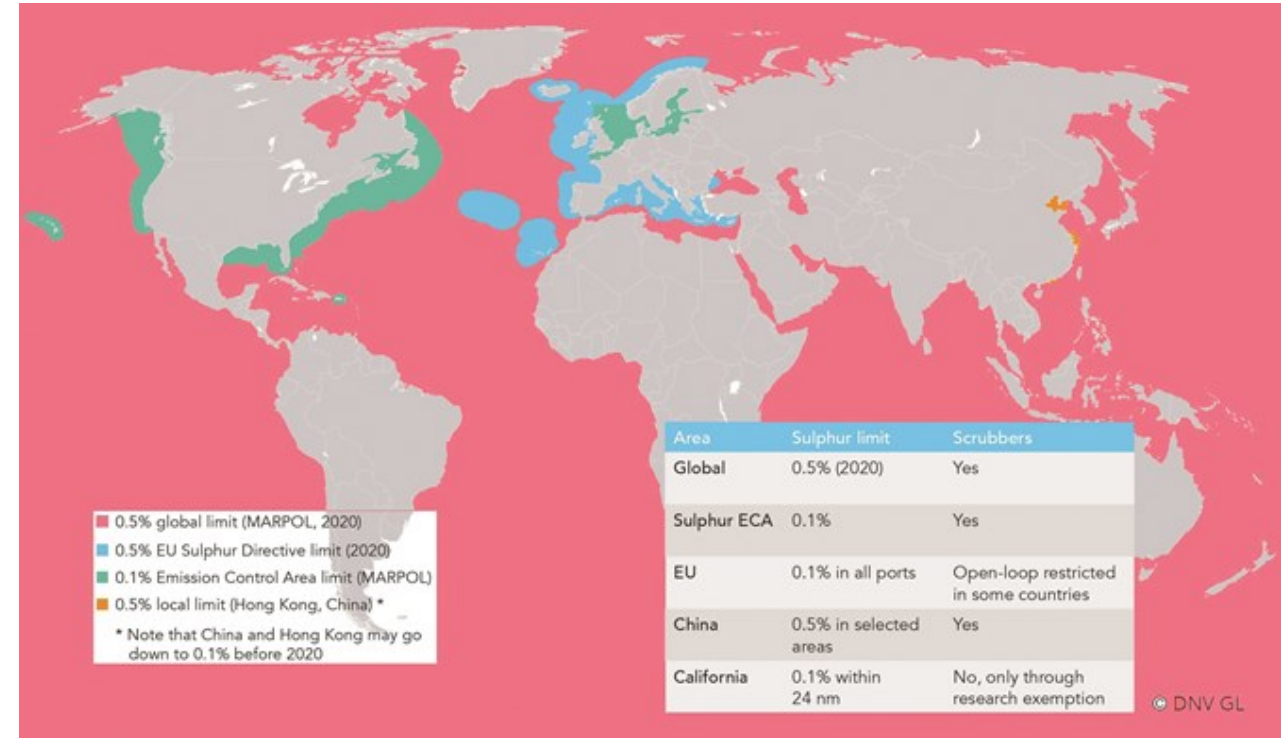
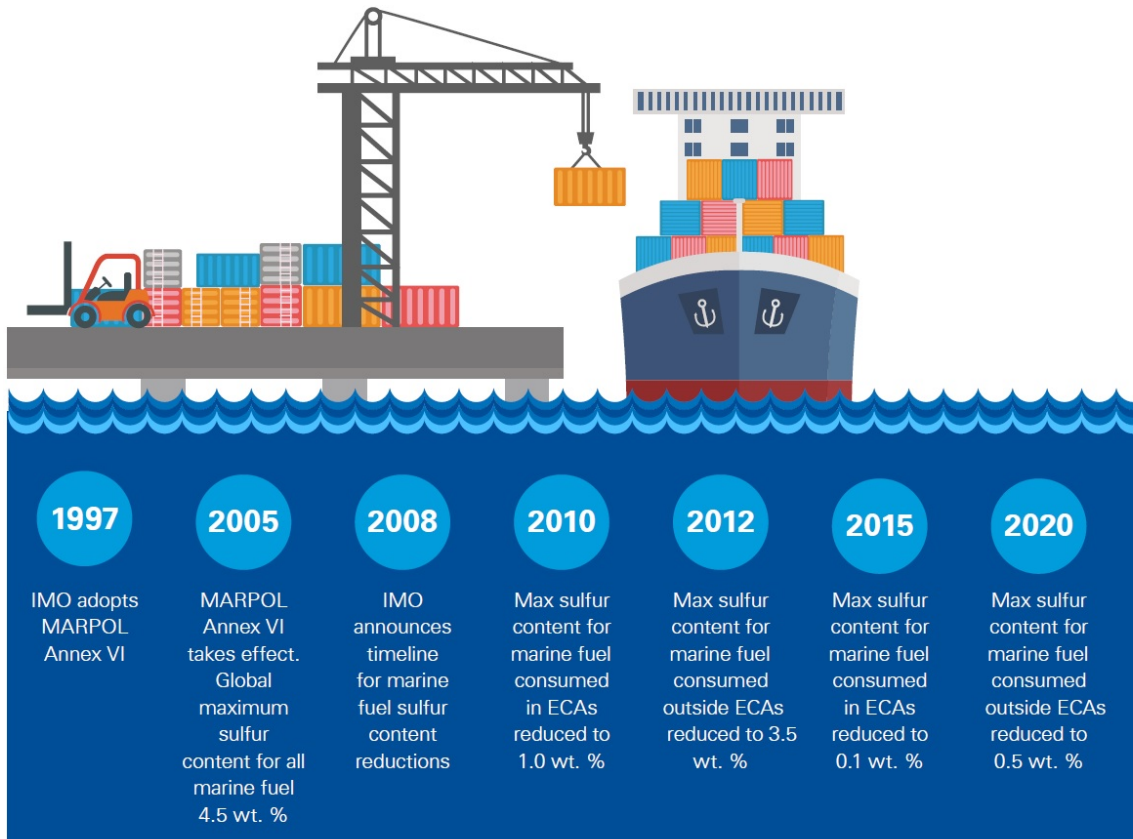
Godofredo Mendes Vianna



Luis G. Raven

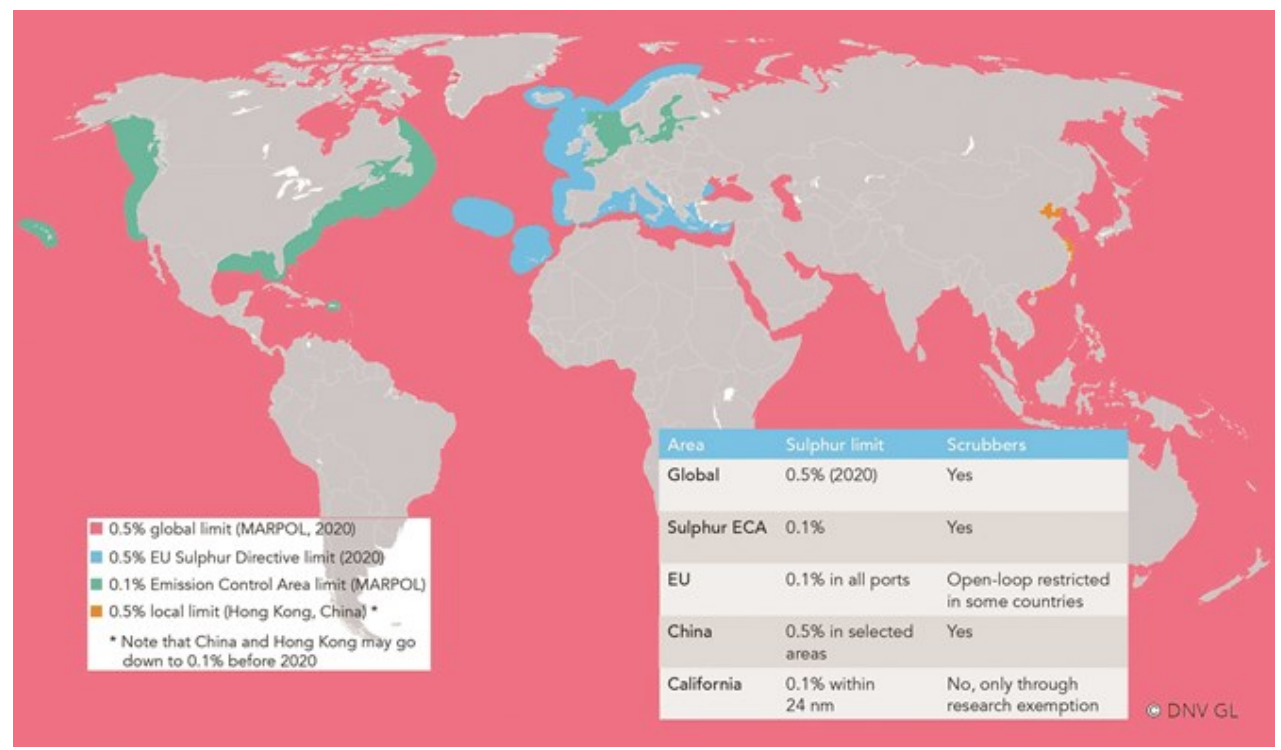
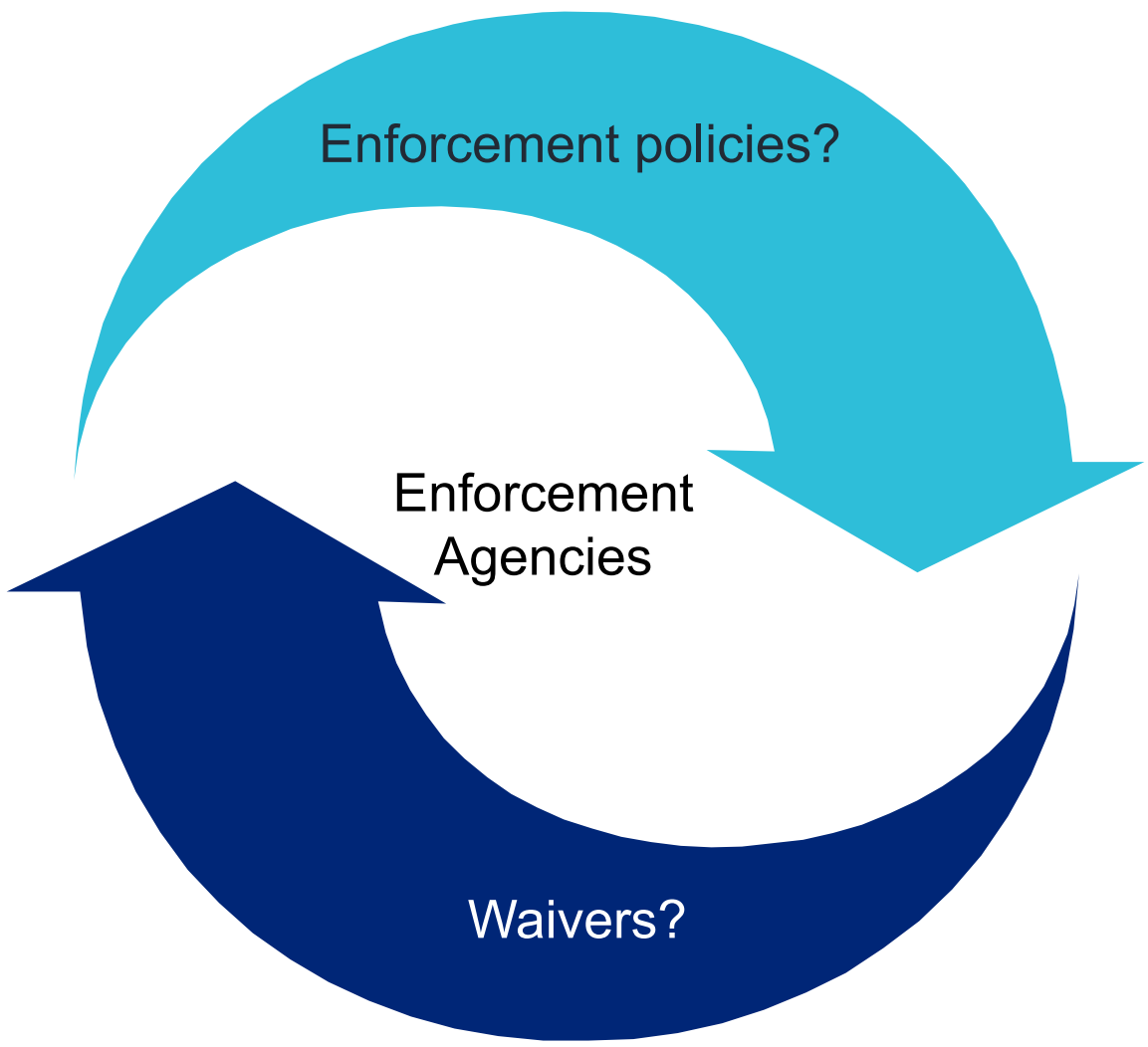


Bobby O'Connor



Timeline for Sulphur content reduction

Established ECAS

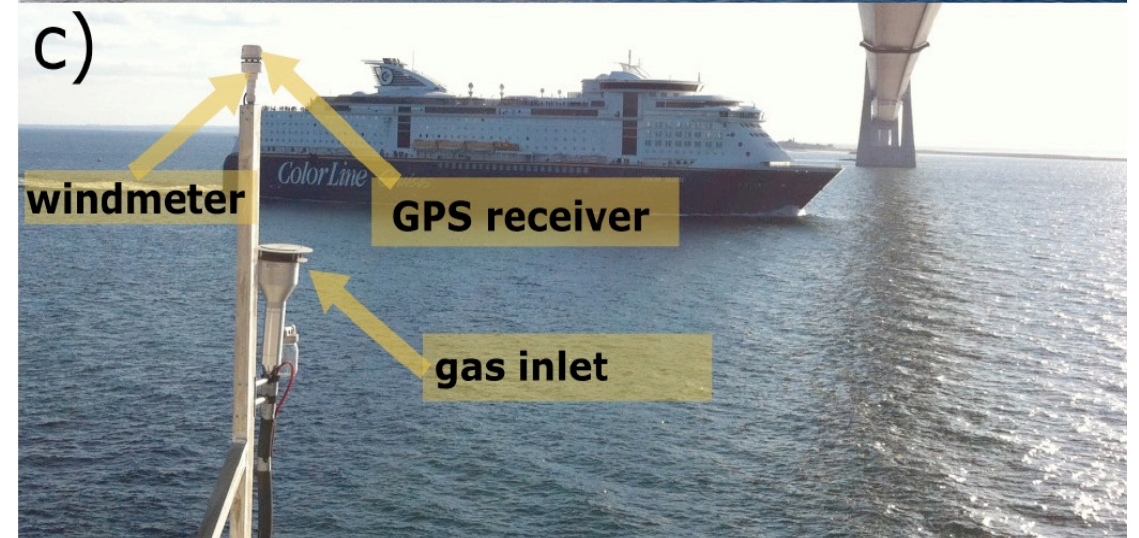
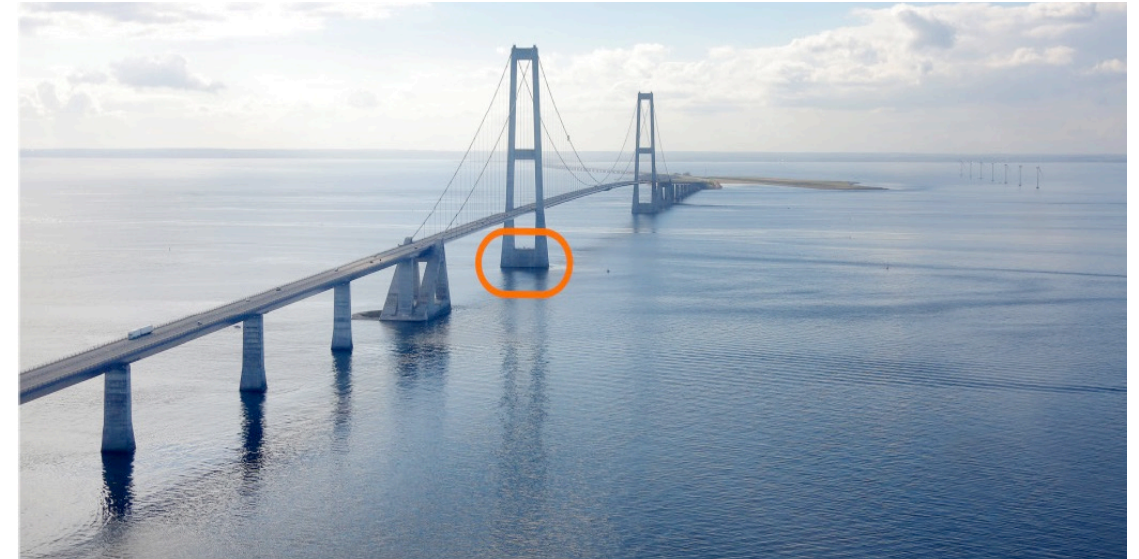


Established ECAS

Penalties, appeal and detention

	U.S.	Denmark	Netherlands	Spain	Panama	Brazil
Penalty Amount	<p>FEDERAL: Up to \$ 25,000 per day / per violation</p> <p>\$2,500 - \$ 15,000 for record keeping offences</p> <p>\$750/MT for burning non-compliant fuel</p> <p>STATE: Individual states have own penalties</p>	€ 4,000 - € 50,000 / violation	<p>€ 830,000 (Cat. 6)</p> <p>€ 83,000 (Cat. 5)</p> <p>€ 20,750 (Cat. 4)</p>	€120,000 (possibly more)	<p>Outside Canal Waters: Authority is considering new monetary penalties</p> <p>Within Canal Waters: \$1,000,000 - \$100</p>	Not yet determined but under study
Appeal Rights	<p>Yes</p> <p>45 days to “decline” a notice of violation</p> <p>30 days to appeal to the USCG commandant thereafter</p>	<p>Yes</p> <p>Appeal to Danish City Court or Danish Shipping Tribunal</p>	<p>Yes</p> <p>Deadline is 14 days</p>	<p>Yes</p> <p>Possibility of 40% reduction</p>	<p>Yes</p> <p>Appeal to the Panama Maritime Authority or the Panama Canal Authority Administrators</p>	<p>Yes</p> <p>Administrative fines and civil / Criminal penalties are Appealable to the Courts</p>
Vessel Detention	Yes	Yes	Yes	Yes	Yes	??

"Sniffer" Technology



”Sniffer” Technology



Thank you!



Camila Sogaard Hudson
Senior Associate

T +45 72 27 34 48
M +45 25 26 34 48
E csm@bechbruun.com

Charlotte van Steenderen
Partner

T +31 (0)10 266 78 69
M +31 (0)6 4316 32 42
E charlotte.vansteenderen@mainportlawyers.com

Luis de San Simón
Partner

M +34 659 556 970
E lsansimon@lsansimon.com

Godofredo Mendes Vianna
Partner

T +55 21 2276 6200
M +55 21 2276 6268
E godofredo@kincaid.com.br

Luis G. Raven
Partner

T +507 265 7668
M +507 6670 7668
E luis.raven@morimor.com

Bobby O'Connor
Partner

T +1 212 551 7794
M +1 516 993 4471
E roconnor@mmwr.com

Air quality (improvements)

	Netherlands		Denmark	
	Emission	Reduction	Emission	Reduction
2009	4.5 (kton/year)	-53%		
2010	2.1 (kton/year)			
2014	1.7 (kton/year)	-59%	0.43 ($\mu\text{g S}/\text{m}^3$)	-67 %
2015	0.7 (kton/year)		0.14 ($\mu\text{g S}/\text{m}^3$)	

