ANNEX I

REGULATIONS FOR THE PREVENTION OF POLLUTION BY OIL

(entered into force 2 October 1983)

Covers prevention of pollution by oil from operational measures as well as from accidental discharges; the 1992 amendments to Annex I made it mandatory for new oil tankers to have double hulls and brought in a phase-in schedule for existing tankers to fit double hulls, which was subsequently revised in 2001 and 2003.

ANNEX II

REGULATIONS FOR THE CONTROL OF POLLUTION BY NOXIOUS LIQUID SUBSTANCES IN BULK

(entered into force 2 October 1983)

Details the discharge criteria and measures for the control of pollution by noxious liquid substances carried in bulk; some 250 substances were evaluated and included in the list appended to the Convention; the discharge of their residues is allowed only to reception facilities until certain concentrations and conditions (which vary with the category of substances) are complied with.

In any case, no discharge of residues containing noxious substances is permitted within 12 miles of the nearest land.

ANNEX III

PREVENTION OF POLLUTION BY HARMFUL SUBSTANCES CARRIED BY SEA IN PACKAGED FORM

(entered into force 1 July 1992)

Contains general requirements for the issuing of detailed standards on packing, marking, labelling, documentation, stowage, quantity limitations, exceptions and notifications.

For the purpose of this Annex, "harmful substances" are those substances which are identified as marine pollutants in the International Maritime Dangerous Goods Code (IMDG Code) or which meet the criteria in the Appendix of Annex III.

ANNEX IV

PREVENTION OF POLLUTION BY SEWAGE FROM SHIPS

(entered into force 27 September 2003)

Contains requirements to control pollution of the sea by sewage; the discharge of sewage into the sea is prohibited, except when the ship has in operation an approved sewage treatment plant or when the ship is discharging comminuted and disinfected sewage using an approved system at a distance of more than three nautical miles from the nearest land; sewage which is not comminuted or disinfected has to be discharged at a distance of more than 12 nautical miles from the nearest land.

ANNEX V

PREVENTION OF POLLUTION BY GARBAGE FROM SHIPS

(entered into force 31 December 1988)

Deals with different types of garbage and specifies the distances from land and the manner in which they may be disposed of; the most important feature of the Annex is the complete ban imposed on the disposal into the sea of all forms of plastics.

ANNEX VI

PREVENTION OF AIR POLLUTION FROM SHIPS

(entered into force 19 May 2005)

Sets limits on sulphur oxide and nitrogen oxide emissions from ship exhausts and prohibits deliberate emissions of ozone-depleting substances; designated emission control areas set more stringent standards for SO_x, NO_x and particulate matter. A chapter adopted in 2011 covers mandatory technical and operational energy efficiency measures aimed at reducing greenhouse gas emissions from ships.

ENVIRONMENT – OUR STRATEGY FOR CLIMATE CHANGE & ENVIRONMENTAL SUSTAINABILITY

In recent years, the global community has become increasingly aware of the urgent need to combat climate change and safeguard our environment. Among the various sectors contributing to environmental degradation, maritime operations have been a focal point due to their significant carbon footprint and potential for ecological harm. To mitigate these impacts, stringent regulations and measures have been introduced to promote compliance and foster sustainability in the maritime industry. Here, we delve into five key areas crucial for achieving environmental stewardship in maritime activities:

1. **Complying with EEXI and CII Regulations**: The Energy Efficiency Existing Ship Index (EEXI) and Carbon Intensity Indicator (CII) regulations have been implemented by the International Maritime Organisation (IMO) to reduce greenhouse gas emissions from existing vessels and monitor the carbon intensity of ships. Shipowners and operators are required to comply with these regulations by optimising vessel efficiency, adopting alternative fuels, and investing in energy-saving technologies. By adhering to EEXI and CII standards, the maritime industry can significantly mitigate its environmental impact and contribute to global efforts to combat climate change.

2. **Compliance with IHM Regulations**: The Inventory of Hazardous Materials (IHM) regulations mandate the proper management and disposal of hazardous materials onboard ships to prevent environmental pollution and protect human health. Shipowners are obligated to conduct thorough IHM assessments, identify hazardous substances, and implement safe handling and disposal practices in accordance with IMO guidelines. Adhering to IHM regulations not only minimises environmental risks but also fosters a culture of responsible waste management within the maritime sector.

3. **Ballast Water and Waste Management**: The discharge of ballast water and improper waste management pose significant threats to marine ecosystems, introducing invasive species and pollutants into delicate habitats. To address these challenges, strict protocols for ballast water treatment and waste disposal have been established under international conventions such as the Ballast Water Management Convention and MARPOL Annex V. Implementing effective ballast water treatment systems and adopting sustainable waste management practices are essential for preserving marine biodiversity and ensuring the long-term health of our oceans.

4. **Zero Spills or Discharges**: Zero spills or discharges must be the ultimate goal for maritime operations to prevent oil spills, chemical leaks, and other hazardous incidents that can devastate marine environments and coastal communities. Comprehensive risk assessment, robust contingency planning, and stringent operational procedures are essential for minimising the likelihood of accidents and responding promptly and effectively in the event of an emergency. Embracing a zero-tolerance approach to spills and discharges reinforces the commitment of the maritime industry to environmental protection and sustainable development.

5. **Control on Single-Use Plastics**: Single-use plastics pose a significant threat to marine ecosystems, contributing to pollution, endangering marine life, and contaminating food chains. Recognising the urgency of this issue, regulatory bodies and industry stakeholders are increasingly implementing measures to restrict the use of single-use plastics onboard vessels. Strategies such as promoting reusable alternatives, implementing recycling programs, and enforcing strict waste reduction policies are crucial for mitigating the adverse impacts of single-use plastics and fostering a cleaner, healthier marine environment.

In conclusion, achieving environmental sustainability in maritime operations requires a comprehensive approach encompassing regulatory compliance, technological innovation, and a commitment to responsible stewardship. By embracing measures such as complying with EEXI and CII regulations, adhering to IHM requirements, implementing effective ballast water and waste management practices, striving for zero spills or discharges, and controlling single-use plastics, the maritime industry can play a pivotal role in mitigating climate change and safeguarding our planet's precious ecosystems for future generations.

GULFNAV's Response	Regulation	Technical Management Response
Installation of UV type ballast water treatment systems in our vessels to comply with latest regulations which do not discharge any residual chlorine overboard.	**IMO Ballast Water Management Convention** Aim: Sets standards for proper management of ballast water and sediments to prevent the spread of harmful marine species. Effective Date: 8 Sep 2017.	GULF FANATIR, GULF HUWAYLAT are already installed with BWTS. GULF DEFFI & GULF JALMUDA installations are ongoing. All our vessel shall comply with D2 standards fully.
Compliance through usage of low-sulphur fuels to comply with latest emission regulations.	**IMO 2020 enhanced global sulphur limit (MARPOL Annex VI, regulation 14)** Aim: Enhances existing limits for sulphur content in marine fuel to reduce emissions of sulphur oxides and other pollutants. Effective Date: 1 Jan 2020.	Vessels supplied with Low Sulphur Fuel Oil (LSFO) to comply with the global sulphur limit.
Initiated advanced data acquisition across fleet.	**IMO Data Collection System (DCS)** Aim: Requires collection of fuel consumption data for ships 5,000 GT or over as part of the mandatory Ship Energy Efficiency Management Plan. Effective Date: 1 Mar 2018 for data collection from 1 Jan 2019.	Data for GULF FANATIR, GULF HUWAYLAT, GULF DEFFI & GULF JALMUDA collation and submission in progress.
Initiated advanced data acquisition across fleet.	**EU Monitoring, Reporting & Verification (MRV)** Aim: Requires collection of CO_2 emissions data for ships over 5,000 GT calling at EU/EFTA ports. Effective Date: 1 Jul 2015 for data collection from 1 Jan 2018.	Data for GULF FANATIR collation and submission in progress. GULF HUWAYLAT, GULF DEFFI & GULF JALMUDA did not call EU in 2023.
Initiated proper calculation planning to declare correct EUA calculations.	**EU ETS – Emission Trading System** Aim: Requires declaration of EUA's used during the voyage to/from/within an EU port Effective Date: 1 Jan 2024.	Data verification and submission in progress for 2024.

CONTINUOUS IMPROVEMENT OF OUR ENVIRONMENTAL PERFORMANCE

WE ARE FULLY COMMITTED TO FURTHER REDUCING ENERGY CONSUMPTION AND CO_2 EMISSIONS ACROSS ALL OUR OPERATIONS. EMISSIONS VARY FROM VESSEL TO VESSEL AND VOYAGE TO VOYAGE, FOR REASONS INCLUDING OPERATIONAL FACTORS, VESSEL LOAD AND WAITING TIMES IN PORTS.

To monitor the performance of individual ships and our fleet over time, among other measures, we use the Energy Efficiency Operational Indicator (EEOI) tool, as set out in the IMO Guideline MEPC.1/circ.684. Our EEOI analyses show that we have significantly reduced our carbon dioxide emissions per metric tonne of cargo moved on a per mile basis. To meet forthcoming EEXI compliance we are collaborating with engine builders like Hyundai and MAN ES to retrofit Engine Power Limiting Devices on our vessels as a short-term compliance solution and further opting for more greener technologies to upgrade our vessels to meet more stringent IMO future requirements.

As an ISO 9001:2015 certified company accredited by Bureau Veritas, GHN is committed to adhering to the requirements of the international management code for the safe operations of vessels, pollution prevention and environmental control including compliance with all the applicable international laws, regulations and requirements.

GULFNAV'S VESSELS ROUTINELY MAINTAIN THE FOLLOWING CERTIFICATES IN COMPLIANCES WITH MARPOL:

- International Anti-Fouling Certificate
- International Oil Pollution Prevention Certificate
- International Ballast Water Management Certificate
- International Sewage Pollution Prevention Certificate
- International Air Pollution Prevention Certificate
- Sanitation Control Certificate
- Garbage Pollution Prevention Certificate
- Certificate of Compliance for Inventory of Hazardous Materials
- Confirmation of Compliance for DCS

GULFNAV endeavours to demonstrate its commitment to environmental protection and the effectiveness and the compliance of its Environmental Management System (EMS) with the MARPOL and ISO 14001 standards requirements. Furthermore, we follow the International Safety Management – ISM Code for safe ship operation and pollution prevention.

For this purpose, GULFNAV has established, documented, and implemented an Environment Management System designed to comply with the upmost national and international requirements.