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To:	All Surveyors/Auditors
Applicable to flag:	All Flags
Subject:	Ballast Water Management Dilemma
Reference:	BWMS

Shipping Industry Faces Ballast Water Management Dilemma

The Round Table (RT) of International Shipping Organizations (comprising BIMCO, the International Chamber of Shipping, Intercargo and INTERTANKO) is deeply concerned if the international convention to regulate ships' ballast water comes into force in the near future without a realistic implementation schedule that recognizes the timetable for US type-approved Ballast Water Management Systems (BWMS) to be available in sufficient quantities.

The RT believes that the resulting dilemma would force the international shipping industry to spend millions of dollars on BWMS that may not achieve US type-approval and therefore will need to be replaced in a short period of time.

The RT emphasizes that it supports the need for international requirements to protect local ecosystems from the impact of invasive species carried in ships' ballast water. The RT also firmly believes that shipping is a global industry requiring global regulation. The Ballast Water Management Convention is developed by the International Maritime Organization (IMO) and is therefore the best instrument to achieve this objective. The RT expects the Convention will be ratified very shortly and enter into force as early as 2016. Shipowners that have not already done so, will be required to spend between US\$1M and US\$5M to install a BWMS on each of their ships in accordance with the schedule established in Assembly Resolution A.1088 (28). It is estimated that there are 50,000 ships that require to be fitted with BWMS over a 5 year period.

However, this may also create an impossible situation for ships that trade to the United States, where unilateral national regulation is already in force. The US regulations ultimately require all ships that discharge ballast into US waters (12 miles) to treat this through a US Coast Guard (USCG) approved BWMS. Currently there are a number of BWMS in the USCG testing and approval process, but none

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that have as yet received type approval. The RT has urged the US Coast Guard to approve as many ballast water management systems as possible, as soon as possible and provide a pragmatic schedule for the installation of such equipment. Further meetings between the RT and senior leaders of the US Environmental Protection Agency (EPA) re-emphasized these points.

There are 54 BWMS approved under the IMO regime, but worryingly only 17 manufacturers have indicated intent to submit their system for USCG approval testing. There is no guarantee that systems submitted will gain approval under the stringent US testing regime; consequentially, when the IMO convention enters into force, ship operators trading to the US will be forced to fit a BWMS that may never achieve USCG type approval. If the chosen system does not obtain USCG approval, it will have to be replaced within 5 years in order to continue to trade to the US. A shipowner, who in good faith wants to comply with international and national ballast water management requirements, therefore faces an unacceptable position of having to possibly invest twice in a BWMS through no fault of his or her own.

Similarly, IMO Member States are strongly urged to take this potentially very costly issue into account when deliberating ballast water management issues at the upcoming 68th session of the IMO Marine Environment Protection Committee. The safest way to avoid it is to ensure that there are sufficient USCG approved BWMS available on the market before the IMO Convention enters into force. This also implies that national BWMS manufacturers should be encouraged to apply for US approval; the low rate of application raises serious concerns over confidence in the operational capability of equipment that is already being sold.

REFERENCES:

BWMS- Assembly Resolution A.1088 (28).

ATTACHMENTS: No.

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