



TECHNICAL CIRCULAR No. 306 of 4th December 2015

To:	All Surveyors/Auditors
Applicable to flag:	All Flags
Subject:	International Chamber of Shipping (ICS) about Ballast Water
Reference:	BWM Convention

ICS Wants IMO to Act on Ballast Water

The IMO has announced that the Ballast Water Management Convention will enter into force worldwide from **24 November 2016**, following ratification by Indonesia (subject to IMO's verification of the gross tonnage data relating to Indonesia's registered fleet).

The International Chamber of Shipping (ICS) has issued a statement saying it believes it is now incumbent upon IMO to finalize the revision of the G8 Type Approval Guidelines as soon as possible in order to ensure that shipowners can have absolute confidence that the expensive equipment they will soon have to install will be effective in treating ballast water conditions normally encountered during worldwide operations and be regarded as fully compliant during Port State Control inspections.

"The fixing of a definite implementation date, after so many years of delay, gives shipowners some of the certainty needed to make important decisions about whether to refit the new mandatory treatment equipment or otherwise to start sending ships for early recycling," says the ICS statement. "However, the entry into force of the new IMO regime does not resolve the extreme difficulties that still exist in the United States. There is still great uncertainty with respect to the more stringent United States approval regime for treatment equipment, which started to be enforced in January 2014 (the U.S. not being a Party to the IMO Convention)."

The U.S. regulations require all ships that discharge ballast water in U.S. waters to use a treatment system approved by the Coast Guard. However, because no systems have yet been approved, ships already required to comply with the U.S. regulations have either been granted extensions to the dates for fitting the required treatment systems or else permitted to install a USCG accepted Alternate Management System (AMS), in practice a system type-approved in accordance with the current IMO Guidelines.

Customer Service Center

5201 Blue Lagoon Drive, 9TH. Floor,
Miami, Fl., 33126
Tel: 1 (305) 716 4116,
Fax: 1 (305) 716 4117,
E-Mail:

joel@conarinagroup.com

Technical Head Office

7111 Dekadine Ct.
Spring, Tx., 77379
Tel: 1 (832) 451 0185,
1 (713) 204 6380

E-Mail: cbozenovici@vcmaritime.com

However, an AMS will only be accepted for operation for five years, after which time a fully USCG approved system must be installed. But the USCG does not guarantee that an AMS will be subsequently granted full approval. Hence shipowners that may have installed an AMS in good faith, at a cost of between US \$1-5 million per ship, might then have to replace the system completely after only five years. This is a particular concern for operators that have installed ultra-violet (UV) systems.

There are over 50 treatment systems approved under the current IMO regime, but worryingly fewer than 20 manufacturers have so far indicated their intent to submit their systems for U.S. approval, states the ICS. The conflicting IMO and U.S. requirements, when combined with the complete lack of systems fully approved by the USCG, could produce an impossible situation in which some ships might not be able to operate in U.S. waters when the IMO Convention enters in force, says ICS.

REFERENCES:

- BWM Convention

ATTACHMENTS: No.

kindest Regards,
Cosmin Bozenovici
Naval Architect – Conarina Technical Head Office

Customer Service Center

5201 Blue Lagoon Drive, 9TH. Floor,
Miami, Fl., 33126
Tel: 1 (305) 716 4116,
Fax: 1 (305) 716 4117,
E-Mail:

joel@conarinagroup.com

Technical Head Office

7111 Dekadine Ct.
Spring, Tx., 77379
Tel: 1 (832) 451 0185,
1 (713) 204 6380

E-Mail: cbozenovici@vcmaritime.com