



TECHNICAL CIRCULAR No. 336 of 1st May 2016

To:	All Surveyors/Auditors
Applicable to flag:	All Flags
Subject:	Ballast Water Treatment: IMO's Regulation Uncertainty
Reference:	IMO Marine Environment Protection Committee (MEPC)

Ballast Water Treatment: IMO's Regulation Uncertainty

IMO's Marine Environment Protection Committee (MEPC) is meeting for its 69th session this week. One of the key items on the agenda for BIMCO is the implementation of the International Convention for the Control and Management of Ships' Ballast Water and Sediments. In particular, the finalization of the revision of the guidelines for approval of ballast water treatment systems (G8) which the organization says are not yet adequate for IMO approved ballast water treatment systems to consistently meet the requirements of the Ballast Water Convention.

The shipping industry needs reliable ballast water treatment systems that are fit for global use. Presently, IMO approved systems may not always live up to the required standards under real operating conditions on board ships.

1. Testing being performed using fresh, brackish and marine waters, including Type Approval (TA) Certificate amendments

Key change proposed:

The water salinities referred to in the guidelines should be amended to:

- Fresh (salinity < 1 PSU)
- Brackish (salinity 10-20 PSU)
- Marine (salinity 28-36 PSU)

2. Testing considering the effect of temperature in cold and tropical waters on operational effectiveness and environmental acceptability

An expert the subgroup found that temperature affects treatment system operations, efficacy, chemical degradation rates and organism regrowth rates and that full scale testing at all temperatures may significantly increase costs of system development and reduce availability of

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approved technologies. The subgroup questioned whether there is an alternative to full scale testing but stated that testing must be robust and reflect real conditions, if possible.

It was concluded by the group that treatment systems should be adequately tested to ensure effective operation at different temperatures using a combination of ship-based, land-based and bench scale tests.

3. Specification of standard test organisms for use in testing

The group considered the need to ensure that test water provided appropriately challenging conditions and the use of standard test organisms as a possible method of ensuring robustness of testing. It was agreed that the use of standard test organisms should not be accepted as the norm.

4. Propose definition of "viability" of organisms, taking into account the damage caused to organisms by ballast water management systems making use of UV

The group supported the definition that viable organisms are organisms that are reproductively viable (meaning the organism has the ability to successfully generate new individuals in order to perpetuate the species).

5. Challenge levels set with respect to suspended solids in test water

It was agreed that challenge levels should reflect "conditions normally encountered during operations," and it acknowledged that current challenge levels do not do this.

Moving Ahead Despite the Uncertainties

"It is recognized that installing and operating a ballast water management system comes at a price and shipowners are understandably concerned about incurring such costs, especially in the current difficult economic climate. Also, new technologies need time to mature, which has caused many owners to stand back and wait. However, these concerns should not stop us from implementing the Convention and I would strongly encourage Member Governments to cooperate and establish meaningful measures which would ease the burden for the shipping industry. However, there can be no doubt that we must move to entry into force and implementation of the Ballast Water Management Convention."

Currently, type approval has been issued for 65 ballast water treatment systems. It's not yet clear how these certifications will be affected by current MEPC discussions.

REFERENCES:

- IMO's Marine Environment Protection Committee (MEPC)

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