



TECHNICAL CIRCULAR No. 349 of 6th July 2016

To:	All Surveyors/Auditors
Applicable to flag:	All Flags
Subject:	Alternate Management Systems Program Update
Reference:	Ballast Water Management (BWM)

Ballast Water Management (BWM)

In November 2015, USCG staff published CG-OES Policy Letter 13-01, Revision 2, which provided guidance to vessel owners and operators seeking to extend compliance dates for implementing ballast water management (BWM) methods. It also cleared up much confusion surrounding the term “compliance date” by creating two different categories of compliance date: “original compliance date” and “extended compliance date.”

Since the publication of the new policy, the Coast Guard has granted nearly 6,000 extensions, surpassing the number of all previous extensions by over 200 percent. USCG continues to communicate with maritime stakeholders at conferences, conventions, and within the IMO to address the myriad complex challenges that surround regulation of ballast water. One of these issues concerns the use of alternate management systems (AMS) onboard vessels that have chosen to install them as ballast water management systems (BWMS).

The AMS provision allows proactive shipowners who have already installed BWMS onboard their vessels, to continue using them until Coast Guard type-approved systems become available. In order to qualify for Coast Guard acceptance as AMS, the systems must first be approved by foreign governments under the standards set forth in the International Convention for the Control and Management of Ships Ballast Water and Sediments, and the Coast Guard must determine that the BWMS is at least as effective as ballast water exchange. As of the date of this publication, the Coast Guard has determined that 58 BWMS have met the criteria for acceptance as AMS.

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The U.S. regulations permit the use of an AMS for up to five years after the vessel is required to comply with the ballast water discharge standard. CG-OES Policy Letter 13-01, Revision 2, did not specify to which compliance date category the AMS provision applied. As a result, many shipowners were left wondering if their installed AMS could be used for five years from their “original compliance date” or from their “extended compliance date.” An installed AMS can be used for five years from the “extended compliance date” if the AMS is installed prior to the expiration of the vessel’s extended compliance date.

REFERENCES:

- BWM

ATTACHMENTS: No.

Kindest Regards,
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