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To:	All Surveyors/Auditors
Applicable to flag:	All Flags
Fate of IMO's Ballast Water Convention	
Reference:	MEPC 71, BWM

Fate of IMO's Ballast Water Convention

The long-delayed Ballast Water Convention is implemented, as intended, in an orderly fashion when ships undergo their special surveys, once every five years.

It ultimately decide whether the Convention's requirements are finally fulfilled across the many thousands of ships, which require ballast water treatment system installations.

"It is a couple of minutes to midnight for this Convention," Marshall declares, "and the outcome of this next MEPC meeting will surely decide its fate. At MEPC 71, it will be discussing a possible postponement of the Convention's entry-into-force by two years, and this may be no bad thing.

Some flag states are now actively marketing a decoupling of the special survey – the time when practically all ballast water treatment system retrofit installations will take place – from renewal of the International Oil Pollution Prevention Certificate (IOPPC). This is the point in time that IMO set as the trigger for system installations because the IOPPC renewal normally takes place during a ship's special survey. Decoupling of the two events is a cynical means of enabling ship owners to buy more time.

A two-year postponement of the Convention's entry-into-force could prove helpful for the industry in several ways, even though it is already 13 years since the Convention was adopted. However, any postponement must come as part of a package which sees shipboard treatment system installations timed, as the IMO has always intended, to coincide with renewal of the IOPPC at the next special survey.

The US is not a party to the IMO Convention and, under US regulations, the trigger for installing treatment systems – either type-approved by the US Coast Guard or authorized for up to five years from a ship's compliance date under its Alternate Management System – is the first drydocking after January 1, 2014 or January 1, 2016 depending on a vessel's ballast water capacity.

Many of the independent ballast water system manufacturers will have given up or gone bust by the time the market emerges, and as a result ship operators will be restricted in their choice of system to the large corporate manufacturers which have diversified product lines that are revenue generating and thus allow them to simply wait for the sector to come good.

No single technology is suitable for all ship types, and having plenty of choice is essential if operators are to undertake effective due diligence before deciding on a particular treatment system.

Courtesy of Andrew Marshall, CEO of Coldharbour Marine

REFERENCES:

- BWM

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Kindest Regards,
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