



TECHNICAL CIRCULAR No. 462 of 04th February 2018

To: All Surveyors/Auditors

Applicable to flag: All Flags

Lack of Due Diligence on Ballast Water Treatment Could Prove Expensive

Reference: BWM

Lack of Due Diligence on Ballast Water Treatment Could Prove Expensive

Many ship operators require a far better understanding of ballast water treatment technologies and their shortcomings in real-life applications. Inadequate due diligence now could result in expensive operational problems in the future, and potential long-term reputational damage. It will be major problems ahead for those ship operators who have adopted a strategy of minimum compliance based on lowest cost, or simply agreed on ballast water treatment systems as part of a standard shipyard specification.

The delegates at the IMO's MEPC 72 meeting in April are likely to sign off the two-year delay on ballast water Convention implementation dates for existing ships – a move which is “regrettable” since it means another two years of threats from invasive species. An extra 24 months will at least allow more time for the essential due diligence which many ship operators have only just begun to come to terms with.

USCG warns as confirmation that type approval for a treatment system does not automatically mean that it is fit-for-purpose. A whole range of operational variables must be carefully assessed, on board the ship itself and relating to its operation. He cites two examples: ultra violet systems can struggle in waters of high turbidity; and electro-chlorination may not be as effective in waters of low temperature and/or low salinity. In both cases, the treatment system may require significantly more power which may or may not be available on-board ship.

Whilst many are working hard to understand the practical issues facing the day-to-day operation of treatment systems, many others are simply relying on type approval certificates and testing data that often bears no resemblance to the conditions that their vessels will face in daily operation. Even when a system is fit for purpose on day one, will it still be working effectively and able to pass Port State Control (PSC) tests in two years' time? For example, a 40-micron filter, which is integral to the effective operation of many systems may be 100% effective when it's new, but will it

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work as well when it's filtered thousands of tonnes of mucky ballast water?"

Filter meshes and filter candles inevitably suffer wear and tear. What is 40 microns today, may no longer be 40 microns in 12 months' time and if larger organisms start to get through, then treatment efficacy is compromised, leading to potential failures in PSC tests. The crew cannot assess any changes to the condition of the filter – the only way to protect against PSC failures is to schedule regular filter element changes, with all the costs that that entails

The risks of inadequate due diligence carry huge financial implications for owners. These include delays, higher port charges, penalty fines and off-hire. In a worst case where a vessel failed PSC tests and was forced to sail for international waters, de-ballast, re-ballast and return to the discharge port, other costs would include additional fuel and more off-hire.

REFERENCES:

- BWM -*Courtesy Coldharbour Marine Limited*

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