



TECHNICAL CIRCULAR No. 481 of 05th May 2018

To: All Surveyors/Auditors

Applicable to flag: All Flags

Ballast Water Deliberations MEPC 72

Reference: IMO's Marine Environment Protection Committee (MEPC 72)

Ballast Water Deliberations MEPC 72

IMO's Marine Environment Protection Committee (MEPC 72) met between April 9 and 13, 2018 with a large number of documents related to the Ballast Water Management (BWM) Convention to be handled.

Of the topics discussed, four of the most important were:

1. Sampling for compliance during commissioning
2. Should contingency measures be part of the BWM Plan?
3. Data gathering for the experience building phase
4. Scaling Guidelines BWM.2/Circ.33

1. Validation of compliance of individual BWM systems with the D-2 standard in conjunction with their commissioning

MEPC adopted earlier the principle of sampling and analysis during commissioning of individual BWM systems in order to verify that the installation is able to discharge water in compliance with the D-2 standard. This was discussed in detail during the MEPC 72 session, and the Review Group (BWRG) produced a draft procedure for how those tests could be done. MEPC later on adopted those procedures and asked for submissions with view of adoption of the guidelines already at MEPC 73 in October.

Discussion

This topic is extremely important as it requires all installations of BWM systems to sample the water they discharge for compliance with the D-2 standard. The current guidance includes the principles:

1. Sample at uptake, without having any requirements of the water properties and number of organisms

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2. Sample during discharge to verify compliance with the D-2 standard

The guidance available at this stage indicates that the analysis should be of an indicative nature. However, indicative analysis is not able to establish compliance with the D-2 standard since it cannot count organisms with such low numbers as is required under the D-2 standard. This text does not make much sense as it stands. Furthermore, the sampling volumes and representativeness of the samples taken are not adequately specified, and there is no validation of indicative analysis devices at this stage.

We expect this text to be further refined during MEPC 73 to include more details. We have done some research on what is available in the market in terms of sampling and analysis. Our conclusion is that detailed analysis is fully possible within reasonable timeframes and costs (i.e. less than one day for results for larger organisms to be available and a cost of approximately \$10,000).

Indicative analysis could be used for bacteria since detailed analysis of those may take several days and bacteria is usually less resistant to BWM system than the larger organisms.

2. Contingency Measures (BWM.2/Circ.62)

During previous MEPC meetings, we discussed in details the negotiations related the contingency measures in cases where ships turn-out at ports with non-compliant water (either D-1 or D-2 standards). The International Association of Classification Societies (IACS) raised the question of whether the general references in BWM.2/Circ.62 which is Guidance on contingency measures under the BWM Convention should be included into existing BWM plans that then should be re-submitted for approval.

Discussion

The conclusion of MEPC is that there is no requirement to revise existing BWM plans to include the new contingency measures, although this is desirable. MEPC might be working on a Unified Interpretations to clarify elements included in the BWM.2/Circ.62, but this will not be required to be included in existing BWM plans.

In general, we recommend that those measures are part of the BWM plans, and we have developed templates for such. This recommendation is part of a general approach to re-visit this important document and include meaningful (non-generic) information in it as Port State Control will use it as background for their inspection of the ships.

However, we have read claims that MEPC requires BWM plans to be re-submitted for approval: this is not correct.

3. Data gathering and analysis for the experience-building phase

The experience-building phase's purpose is to allow the MEPC to monitor and improve the BWM Convention and consists of a data gathering stage, a data analysis stage and a BWM Convention review stage. The phase started September 8, 2017 and ends at the entry into force of a package of priority amendments. It is managed and organized by the Secretariat of the IMO and includes

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standard forms for gathering and analysis of the data.

The BWRG developed a timetable on how the experience-building phase would roll out, starting with MEPC 74 in Spring 2019 when the first set of data is expected to be available for MEPC for consideration. The timeline of the phase will stretch out until MEPC 79 in Autumn 2022.

Discussion

The experience-building phase is a very important initiative where industry and Administrations can report back to the IMO on how the BWM Convention is actually working. We encourage all parties to grasp this opportunity and send feedback to the IMO following the standard reports that are available from the IMO.

4. Scaling Guidelines (BWM.2/Circ.33)

After a submission by Denmark, the BWRG re-visited in detail the guidelines for scaling of BWMS and re-wrote the whole document from scratch.

Discussion

The new guidelines for scaling follow the same setup as the BWMS Code in the sense that it provides a structured way for approaching scaling and allowing Administrations to give enough attention to this important aspect of type approval of BWM systems. The BWRG avoided being too descriptive in its approach for scaling and laid out a process where land-based, shipboard, environmental and other tests could be used as means to verify that scaling of the BWM system is done properly.

A question that is still not answered by MEPC is the date of application of the new guidance. Since this is required by the BWMS Code, it should be straight-forward that the new BWM.2/Circ.33 must be used for those BWMS seeking approval under the BWMS Code. For BWM systems that are undergoing 2016 G8 Guidelines type approval, the old BWM.2/Circ.33 should still be possible to use. Our recommendation is to use the new BWM.2/Circ.33 regardless of when the type approval process started.

REFERENCES:

- IMO and courtesy Jad Mouawad

- ATTACHMENTS: No.

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