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NEWSLETTER



Outcome of IMO's III 4

The Sub-Committee on Implementation of IMO Instruments (III) met from the 25th - 29th September 2017 and on their agenda was and important discussion on implementation of the sampling and analysis of water treated by a BWMS, right after installation and commissioning, but before issuance of the International BWM Certificate for the ship.

Background

MEPC tasked III to update the Survey Guidelines for BWMS under the Harmonised System of Survey and Certification (HSSC) where validation Mouawad Consulting follows all the work that is done by regulatory committees at the IMO, that are relevant to the BWM Convention of compliance of the individual BWMS with the D-2 standard should be included.

Explanation

As we have reported previously, MEPC 71 endorsed a decision made at MEPC 70 to make sure that each BWMS is checked for compliance with the D-2 standard after installation and commissioning onboard a ship.

III was tasked to update their guidelines for that purpose.

Discussion

As expected, this paragraph took a lot of discussions as it is still not clear which party is responsible for the sampling and analysis.

While the HSSC was amended to include the sentence proposed by MEPC (i.e. that sampling and analysis shall be done), III concluded that there are a number of issues that must be clarified by MEPC:

- 1. which entity will be responsible for the sampling and analysis (shipyard, owner, manufacturer, flag State or RO)?
- 2. how would compliance be verified?
- 3. do we need new guidelines for this or can we use existing ones?

Conclusion

The following decisions were taken regarding this issue:

- 1. The new survey guidelines should not apply to vessels which have already been subject to an initial survey prior to the entry into force of the proposed guidelines.
- 2. Ask MEPC to clarify issues of procedures, responsibilities, success or failure criteria,...
- 3. Ask MEPC if the Survey Guidelines related to BWM under the HSSC should be revised due to the 2016 G8 Guidelines for Type Approval being adopted.

Executive summary & recommendations

MEPC will require that each installation be checked to prove compliance with the D-2 standard.

Ship owners and makers should start getting familiar with the procedures for doing so, when they are finalised by MEPC.

7 November 2017 -Beirut BWM Conference







Mouawad Consulting has a Global presence supporting our vision to become the most relied on engineering company worldwide, when it comes to issues related to the BWM Convention.

Wondering how you can verify your ship for compliance as required by the IMO? Contact us!