

TODAY'S NEWS

Report from PPR 5

MEPC 72 - 9 to 13 April 2018

Mouawad Consulting participates in the Marine Environment Protection Committee meetings of the IMO as members of the Norwegian Delegation.

20th Ballast Water Management Summit - 18-19 April 2018 - Vallejo, USA

We will be present during this conference to share our experiences in retrofitting BWMS.

Posidonia - June 2018 - Athens, Greece

We will be present throughout the Posidonia week and visit customers.

BWM Tech North America - September 2018 - Fort Lauderdale, USA

We will present and participate in panels on various topics.



Hot Topics at PPR 5

IMO's Pollution Prevention and Response (PPR) sub-committee had its annual meeting from 5-9 February 2018 with the following Ballast Water Management (BWM) topics on its agenda:

- 1 - Analysis methods for determining viability of organisms
- 2 - System Design Limitations (SDL) on Type Approval
- 3 - Ports with Challenging Water Conditions
- 4 - Guidance for sampling for research studies
- 5 - Changes to Guidelines G2 based on sampling experiences

Finally, Ballast Equipment Manufacturers Association (BEMA) preliminary meeting took place the same week.





Mouawad Consulting at the IMO

Mouawad Consulting participates as advisors to the Norwegian Delegation to the Marine Environment Protection Committee (MEPC) and Pollution Prevention and Response (PPR).

By being actively present at the heart of the body regulating the development of the BWM market, we offer our clients:

- Direct insight into how regulations and politics are developing
- Advice on best practices to mitigate the effect of changing regulations
- State of the art advice based on the latest updates and developments

We have offices in Norway (Hamar), China (Shanghai) and Lebanon (Beirut) that support our customers with all issues related to BWM, from regulatory consultancy to engineering surveys and turnkey retrofit solutions, as well as commissioning of BWMS onboard ships during dry-docks and new builds.

Analysis methods for determining viability of organisms

The Netherlands submitted a paper to MEPC 71 detailing the use of two methods for determining the viability of organisms in the 10 to 50 µm size class.

After a discussion at the Review Group, it was determined that those methods are not suitable for inclusion in the methodologies for type approval and that the Netherlands should specify in details how they could be used in combination at later submissions.

Discussion

We support the decision of the IMO and believe those methods are good as indicative methods but not necessarily as methods for detailed analysis during type approval and should not be included in the circular for type approval.

System Design Limitations (SDL)

SDL is a new feature in the 2016 G8 Guidelines (soon to be Code for Approval of BWMS), and is important to assist ship operators identify the operational limitations of BWMS. The document offers guidance based on technologies used and indicates typical parameters to be considered.

Discussion

PPR 5 has now agreed on a final guidance document to accompany the new Code for Approval of BWMS. However, the Code lacks direct reference to this guidance document, and some parameters included there are not easy to determine or specify. It will therefore still be up to the Administrations to include the most relevant operational limitations.

It is important to note here that Temperature and Salinity are Limiting Conditions but not SDLs.

Ports with Challenging Water Conditions

The document addresses issues related to ballast water drawn from certain specific ports with challenging water quality (PCWQs). PCWQ's may pose severe challenges to most existing BWMS in meeting regulation D-2.

Discussion

After a brief discussion at PPR 5, the group agreed to ask MEPC for submissions from Administrations on their practices when ships meet water conditions that the BWMS cannot cope with.

This is not expected to take place before MEPC 73 in October 2018 so the discussion has been diplomatically postponed until further information is available.

This is a very difficult topic and one that is in the core of the challenges in implementing the BWM Convention. We believe it is best for MEPC to bite the bullet and agree on a common approach to deal with those ships. Such approach could be to exceptionally accept the previously discussed concept of Exchange + Treatment. To avoid that this becomes a normal practice (i.e. discharging untreated ballast water in the high seas), exceptional cases should be clearly defined.

Sampling and Analysis

Few documents were submitted to PPR 5 discussing how to sample ballast water onboard ships for research purposes, and proposed changes to Guidelines G2 based on experiences from sampling onboard ships.

While the ICES document on Standard Operating Procedures (SOP) went through with no discussion, the other two documents, especially the report by Saudi Arabia, gathered a lot of attention that we will summarise here in this report.

Discussion

Sampling device proposed by Korea

The Korean delegation shared their experience from sampling in the field, claiming that the ballast water sampled from current arrangements (based on the current G-2 isokinetic design) do not result in representative samples of the ballast water in the tanks.

Based on CFD analysis and extended studies, they propose changes to the way an isokinetic sampling device should be arranged.

After a discussion in the group, PPR recommended the Korean proposal to be implemented in the work the ISO is undergoing on standards for sampling.

We support that all work on sampling devices is consolidated within the work the ISO is doing to avoid having several standards, and would recommend this submission and similar efforts to be channeled through the ISO system.

Sampling and Analysis efforts at Saudi ports

Saudi Arabia presented a summary of the sampling and analysis they had undergone on tankers calling their oil terminals. In the paper submitted to PPR 5, one gets the impression that most ships with installed BWMS did not manage to meet the D-2 standard. Furthermore, the paper from Saudi Arabia claimed that ships that did Ballast Water Exchange had discharges meeting the D-2 standard.

During the presentation at the IMO, the following facts were presented:

- 1 - The sampling device determined the viability of organisms in the 10 to 50 µm size class only
- 2 - The sampling device of Chelsea Technologies does not account for organisms rendered harmless by UV but not dead, so false positives from UV systems can be expected in the results of the indicative analysis
- 3 - Out of the approx. 500 ships sampled, only 69 had BWMS installed, amongst which, 45 were operational
- 4 - Of the 45 ships with operational BWMS, only 5 did not meet the D-2 standard when sampled

The above facts contradict to a large degree the conclusions and summary presented in the PPR paper submitted by Saudi Arabia.

While we applaud the efforts made by the local authorities to verify compliance with the D-2 standard, we caution against drawing conclusions that are not supported by actual findings. In the case at hand, we actually find it quite positive that 40 out of 45 ships were in full compliance with the D-2 standard.

We need of course more information and details on the circumstances of those ships that did not manage the standard to improve the installation and operation of BWMS, but believe that this effort by Saudi Arabia is an excellent start that should be continued and followed by other countries.