

TODAY'S NEWS

Report from MEPC 72

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.

7th Annual World Congress of Ocean - October 2018 - Qingdao, China

We will discuss BWM during this important gathering in China .



Hot Topics at PPR 5

MEPC 72 met between 9 and 13 April 2018, with a large number of documents related to the Ballast Water Management Convention to be handled. Six documents were submitted as considerations and amendments to the BWM Convention, while 15 documents were submitted to be considered by the Review Group (BWRG).

Of the topics discussed, the most important were:

- 1 - Denial of Final Approval of the Envirocleanse BWMS
- 2 - Scaling Guidelines BWM.2/Circ.33
- 3 - Sampling for compliance during commissioning
- 4 - Should contingency measures be part of the BWM Plan?





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), Korea (Busan) 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.

Considerations and Amendments to the BWM Convention

Those documents usually relate to technical changes to terms and references in the BWM Convention, with no major significance besides making small improvements to the current text of the BWM Convention.

The most significant of those documents is the adoption of the Code for approval of ballast water management systems (BWMS Code), which makes the type approval procedure mandatory.

Final Approval of the Envirocleanse InTank BWTS (Bulk Chemical Variation)

MEPC endorsed the recommendation by GESAMP-BWWG to deny the system Final Approval due to unexpected values during the chemical analysis in fresh and marine water..

Discussion

It comes as a surprise that the values detected in the chemical analysis were not verified and addressed prior to the application for Final Approval being submitted to the IMO. We understand that Envirocleanse is planning to submit a new application to MEPC 73; however, a question to whether those elevated values should be a matter of concern..

Scaling Guidelines (BWM.2/Circ.33)

After a submission by Denmark, the BWRG re-visited in details 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 BWMS.

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 BWMS 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 BWMS 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.

Data gathering and analysis for the Experience-building phase (EBP)

The EBP'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 EBP started 8 September 2017 and ends at the entry into force of a package of priority amendments. The EBP is managed and organised by the Secretariat of the IMO and includes standard forms for gathering and analysis of the data.

The BWRG developed a timetable on how the EBP 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 EBP will stretch out until MEPC 79 in Autumn 2022.

Discussion

The EBP 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.

Mouawad Consulting is able to provide those forms on request.

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).

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 (PSC) 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.

Validation of compliance of individual BWMS with the D-2 standard in conjunction with their commissioning

As our readers probably recall, MEPC adopted earlier the principle of sampling and analysis during commissioning of individual BWMS in order to verify that the installation is able to discharge water in compliance with the D-2 standard.

This was discussed in details during the MEPC 72 session and the 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 BWMS to sample the water they discharge for compliance with the D-2 standard, as a condition for issuance of the International Ballast Water Management Convention.

The current guidance includes the principles below:

1. Sample at uptake, without having any requirements of the water properties and number of organisms
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, since 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 on the above. 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 1 day for results for larger organisms to be available and a cost of approximately US\$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 BWMS than the larger organisms.