

The Marshall Islands Registry

19 October 2016 Piraeus, Greece

The Republic of the Marshall Islands Registry Understands and is Engaging with the Greek Shipping Industry with Respect to their Major Concerns Over the Ballast Water Management Convention Implementation

The Republic of the Marshall Islands (RMI) Registry participated in a discussion coordinated by the Marine Technical Managers Association (MARTECMA) on 18 October 2016 at Maran Tankers Management Inc.'s auditorium in Athens. The main topic of the discussion was the Ballast Water Management Convention (BWMC) and the forthcoming International Maritime Organization (IMO) Marine Environment Protection Committee's (MEPC's) 70th Session to be held in London from 24-28 October 2016. Rear Admiral (RADM) Robert North (retired) and Thanos Theocharis represented the RMI Registry and provided information regarding the Registry's position which will be brought forward during MEPC 70.

The RMI, although having ratified the BWMC, recognized the difficulties and possible complications caused by its introduction, both in the implementation process as well as commercially. In the light of this fact and by reference to the BWMC requirements, the RMI's main position on the implementation of the BWMC is the harmonization of all processes required in order for all relevant parties to smoothly and safely adapt to the new requirements. More specifically, the RMI will support proposals for bringing revised Guidelines for Approval of Ballast Water Management Systems (G8) in line with the United States (US) Environmental Technology Verification (ETV), so that a system approved for the US Coast Guard (USCG) can be approved for the BWMC, and vice-versa. The RMI will not object to early renewal of the International Oil Pollution Prevention (IOPP) Certificate, and note this can be a method of allowing time for harmonizing of the revised G8 Guidelines and US ETV. As currently drafted, the proposed amendment to the BWMC is linked to the renewal survey associated with the IOPP Certificate. Therefore, if this is the actual amendment, then the early renewal of the IOPP Certificate will allow five (5) years from the point of renewal for Ballast Water Management System (BWMS) installation. The RMI considers the trial period, which will commence at entry into force of the BWMC, as vital to ensuring the implementation is practical, it does not penalize ships that installed BWMS in good faith ("early movers") and continues to maintain and operate these in line with the manufacturer's guidance. The RMI fully supports the nonpenalization of early movers during and after the trial period.

"The RMI Registry has qualified and experienced technical personnel across the globe, in order to support workable solutions for the industry, and has established a Ballast Water Management team," said Theofilos Xenakoudis, Director, Worldwide Business Operations of International Registries, Inc. (IRI), which provides administrative and technical support to the RMI Maritime and Corporate Registries. "This MARTECMA meeting has provided the Hellenic technical

community an opportunity to listen to the RMI Registry's position and exchange positive and productive feedback ahead of MEPC 70," continued Mr. Xenakoudis.

Thanos Theocharis, Regulatory Affairs, European Liaison for IRI thanked MARTECMA and its Board of Directors for accepting the RMI Registry's participation to discuss the important issues and concerns surrounding the BWMC. "The BWMC has been ratified by 52 contracting Parties that brings the combined tonnage of contracting States to 35.14% of world tonnage," said Mr. Theocharis. "In light of the upcoming MEPC 70, which both RADM North and I will be attending, it is important to note that the RMI Registry is working towards the best guidance for industry stakeholders, providing them with technical advice, recommendations, and suggestions that will promote the best practical solutions to the BWMC requirements," he continued.

Mr. Dimitrios Heliotis, Chairman of the MARTECMA Council, said, "we express our great appreciation to the RMI for enlightening us regarding their position ahead of the upcoming MEPC 70 and to all our members for participating in this productive discussion on a subject of such an importance for all of us." "The implementation of the BWMC will be a great challenge for our industry; therefore, we must have in place the appropriate tools and procedures in order to mitigate the risks involved in the technical operations and vessel's commercial performance," he continued. "We support a comprehensive postponement of the implementation schedule for all existing ships by at least five (5) years after September 2017 as the only sustainable way forward to achieve cost effective and safe solutions with full commitment to the protection of the environment," he concluded.