



INTERTANKO

Ballast Water Management

IMO Developments and State of Affairs

Marshall Islands Quality Council

London, 1 April 2014



Tim Wilkins

INTERTANKO Senior Manager - Environment

Image courtesy of Samco Shipholding Pte Ltd

Leading the way; making a difference



Overview

1. *IMO and the Ballast Water Management Convention*

- 1. Historical*
- 2. State of Affairs*

2. *Ballast Water Management Systems*

- 1. Approved Systems*
- 2. Approval Process*



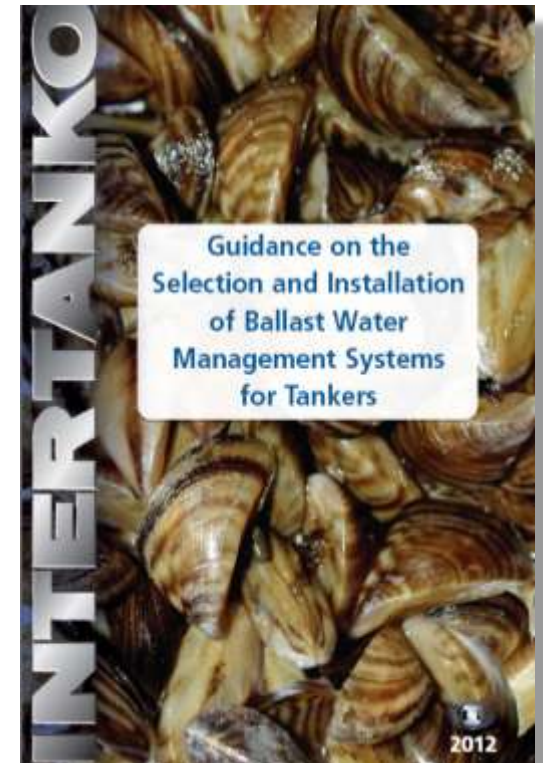
INTERTANKO's Strategic Plan

Desired outcome:

Tanker industry is able to achieve compliance with current and future discharge standards (both regionally and internationally)

Focus:

1. Installation and Operation of appropriate and adequate ballast water management systems
2. Compliance and enforcement – need strong, well defined and realistic international regulations





1. The Regulatory Environment : IMO

Ballast Water Management Convention

- Adopted in 2004
- Entry into force requires ratification by 30 countries, 35% world's grt
- Currently, **38** countries, **30.38%** grt





1. The Regulatory Environment : IMO

Ballast Water Management Convention

- May '12 INTERTANKO Council recommends comprehensive document detailing technical, operational and compliance challenges and proposing solution to be sent to IMO
- Oct '12 MEPC 64 Submission – Marshall Islands, Liberia and industry
1. Guidelines for approval of ballast water management systems (G8)
 2. Availability of Ballast Water Management Systems (BWMS)
 3. Procedures for port State control
 4. Survey and certification requirements





1. The Regulatory Environment : IMO

Ballast Water Management Convention

Oct '12 Outcome of MEPC 64

1. Guidelines for approval of ballast water management systems (G8);

No revision of Guidelines BUT increased transparency of type approval process and more information provided to ship operators on BWMS capabilities and limitations

2. Availability of Ballast Water Management Systems (BWMS);

Develop a draft Assembly Resolution to reschedule implementation of the Convention

3. Procedures for port State control

Sampling and analysis procedures for PSC should be no more stringent than what is required for type approval of BWMS

Proposed a trial period for sampling by PSC

4. Survey and certification requirements

Agreed with INTERTANKO and issued a Circular





1. The Regulatory Environment : IMO

Ballast Water Management Convention

Nov '13 Remaining challenges post-MEPC 65

1. Implementation Schedule
2. Ballast Water Management Systems (Approval)
3. Port State Control





1. The Regulatory Environment : IMO

1. Implementation schedule

Assembly Resolution A.1088 (28) adopted, Dec 2013
recommends governments:

1. implement the Convention **based on the entry into force date** of the Convention
2. considers **ALL** vessels constructed before entry into force as existing vessels
3. existing vessels to install a BWMS at the first renewal survey (IOPP Certificate under Annex I of MARPOL) after entry into force of the Convention





1. The Regulatory Environment : IMO

2. BWMS Type Approvals

- Good progress at MEPC 65 with greater quantity and quality of information with increasing transparency – however - there remains a need to review and revise the IMO's Type Approval Guidelines (G8)
- INTERTANKO Council, G8 Guidelines, *'still not adequate in providing tanker operators with reliable, dependable BWMS to install on board their tankers'*
- Submission to MEPC 66 with BIMCO, ICS, WSC & INTERCARGO:
 1. Amend G8 (salinity, temperature, organisms, sediment, flow rates)
 2. Grandfathering to protect owners who have taken action
 3. Send a signal to Governments



1. The Regulatory Environment : IMO

3. Port State Control

- Trial Period (initially for 3 years) following entry into force
- To trial sampling and testing procedures
- During this period, port states will *'refrain from detaining a ship or initiating criminal sanctions in the event a BWMS does not meet the discharge standard'*.
- Still disagreement on when it is appropriate to sample – what evidence, if any, should be present to initiate PSC sampling





2. Ballast Water Technology

1. Approved Systems

- IMO
 - Type Approved (G8) 33 *
- US
 - Coast Guard approved 0
 - Alternate Management Systems (AMS) 27 (+3) **

* Last updated by IMO, May 2013 (MEPC 65)

** Last updated by USCG, 14 November 2013



2. Ballast Water Technology

2. Approval Process

- IMO
 - Update requirements for manufacturers submitting information to Administrations (BWM.2/Circ.43)
 - Updated information to be included in Type Approval Certification, e.g. BWMS limitations (Resolution MEPC.228(65))
 - No Review of G8 planned, but...
 - University of Maryland – tests IMO G8 approved BWMS against US approval standards – 3 systems fail
 - INTERTANKO *et al.* submission to MEPC 66
- US
 - 2 independent laboratories authorised (US and Norway)



Concluding remarks

1. Positive developments at IMO, but more work needs to be done
2. Sharing of experience and information between owners essential
 1. Does the BWMS work?
 2. Does it work as it was approved to work?
 3. Does it meet the discharge standards?
 4. INTERTANKO members will share information on BWMS installed
3. Continue to propose amendments to IMO's BWM Guidelines based upon experience gained, while supporting their international and uniform approach



thank you