Ballast Water Collaborative
IMO Latest Updates

Silver Springs
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Chris Wiley
Chair IMO
Ballast Water Groups
International Maritime Organization

- The common sense and experience of seafarers coupled with technological knowledge, scientific research and political agendas of member states and observers
IMO Process for Ballast Water Reorganization

- Marine Environmental Protection Committee (MEPC)
  - Ballast Review Group
- Bulk, Liquid Gas Subcommittee (now Pollution Prevention and Response - PPR)
  - Ballast Water Working / Drafting Group
- Flag State Implementation Sub Committee (now Implementation of IMO Instruments - III)
  - Correspondence Group to provide input into Port State Control Working Group
- Input from other Committees as appropriate
  - Marine Safety Committee, Legal etc.
BW Convention

- 38 Countries / 30.32% of global tonnage
- Requirement 30 Counties / 35% Tonnage
- Convention comes into force one year after conditions met.
- No ratifications since Switzerland
- Rumours for 2014
Resolution of uncertainty for Administrations / Ship Owners

- Sufficient Type Approved BWMS available to the market
- Confidence that type approved BWMS will meet the D-2 standards in conditions that ships operate in
- Clear Guidance in place as get experience with fitting / operating BW management systems
- Resolution of implementation dates, as dates have slipped
- An enforcement regime that is fair and consistent word wide that provides a mechanism for port states to protect their environment
Are there sufficient BW Type Approved BWMS available?

- Lloyds, ABS, others
- 38 plus systems currently Type Approved to G8
- GESAMP approvals MEPC
- Basic / Final if active substance
- 60 + systems in the market at various stages of approval
- Experience in real world being reported
Guidance from IMO

• High Level
• To assist in providing uniform application
• No other Convention has such a large suite of Guidance put in place in such a short time frame
• Is not intended to provide prescriptive and specific detailed requirements – though in some cases it does
• In some case Guidance was in place prior to the actual BW Technology being invented
• Need to update now that experience in place.
Guidance for Uniform Implementation

- Guidelines for sediments reception facilities (G1)
- Guidelines for Ballast Water Sampling (G2)
  
  Sampling & Analysis protocol
- Guidelines for ballast water management equivalent compliance (G3)
- Guidelines for BW Management and Development of BW Management Plans (G4)
- Guidelines for ballast water reception facilities (G5)
- Guidelines for Ballast Water Exchange (G6)
- Guidelines for Risk Assessment under Regulation A-4 (G7)
- Guidelines for approval of Ballast Water Management Systems (G8)
- Procedure for Approval of BWM systems that make use of Active Substances (G9)
- Guidelines for approval and oversight of prototype BWM technology programs (G10)
- Guidelines for Ballast Water Exchange Design and Construction Standards (G11)
- Guidelines for sediment control on ships (G12)
- Guidelines for additional measures including emergency situations (G13)
- Guidelines on designation of areas for ballast water exchange (G14)
- Guidelines for Ballast Water Exchange in the Antarctic Treaty area
- Guidelines for Scaling
- Guidelines for Type testing
- Guidelines for Use of Basic Approval
- Guidelines for Other Methods
Need for continual update of Guidance as gain experience in “real world” with BWMS

- Recent examples
- Guidance on use of BWMS on offshore supply vessels
- Use of Drinking water for ballast
- Use of Eductors for BWMS that use treatment on Discharge
Type Approval

• Traditional way for shipboard machinery to be tested and certified in order to be safely used aboard vessels.
• Shake, rattle and roll
• In case of BWMS, not typical of traditional type testing carried out by class – biology
• Type testing undertaken by 16 facilities around the world
• GloBal TestNet MOU
• Strive for comparable and accurate results
• Approvals given by Flag State
Type Approval Certificate
Issues found on reporting on Type Approval Certificates

- Many TA Certificates being found to be lacking information
- Description of Test protocol
- Test results for each land and ship test runs in Annex

Limiting conditions
- e.g. salinity, UV transmittance, temperature
- Operating parameters max/min pressure, pressure differentials, TRO etc
Amendment to Guidance for Administrations on Type Approval Process

- More / sufficient information required to verify operation in different salinity, temperature, sediment loads, treatment rated capacity, safety
- Include unsuccessful tests in documentation
- Proposal to implement self monitoring system to ensure correct operation of system
- Safety and hazard assessment on ships crew
- Show all limitations, test results
Industry concerns re Type Approval Process

- Expectation of “black box” that would work anywhere in worldwide trading
- Reality somewhat different
- Concerns over different interpretations of requirements of G8 depending on test facility
- US has not “accepted” IMO G8 approvals
- ETV process in US
- Submission to reopen G8 at next MEPC
Industry Recommendations to Address Problems with G8

- Testing should:
- Not allow test runs that do not meet D-2 Standard to be counted
- Be undertaken across a wide range of salinities
- Consider the effect of water temperature
- Use organisms that challenge the treatment process and should be standardized across BWMS test facilities
- Increase the levels of suspended solids in the challenge water to meet real world conditions
- Should represent actual flow rates for which a BWMS is approved
IMO Politics over G8

- Media release by ICS
- No Administration attached to MEPC 66/2/11
- Comparison between G8 / ETV
- Lack of data from industry to IMO supporting statements suggesting current BWMS having problems meeting standards
- G8 and ETV not mutually exclusive
- New MEPC chair – focus from Assembly on Outputs specific to Port State Control
Resolution of Implementation Dates

• Dates have slipped since 2004
• Cannot change dates as cannot amend a Convention that is not in force
• Agreement among Parties to implement enforcement schedule for Reg B-3
• Inherent problem – new enforcement schedule refers to renewal survey not harmonized to other statutory instruments
• Demand would peak 5 years after entry
• Distributes dates of compliance evenly
Assembly Resolution 1088 (28)

- December 2013
- Comes into effect on entry into force
- Recommends ships constructed before entry into force of BW Convention, not be required to comply with Reg D-2 until first “renewal survey” following date of entry into force
- Use of IOPP under MARPOL as survey date
- Attempt to provide realistic timeframe for enforcement
- Unintended consequence - negative impact on BWMS Vendors, early implementers
An enforcement regime that is fair and consistent worldwide that provides a mechanism for port states to protect their environment

Port State Control
Port State Control Issues

- BW Convention allows sampling before clear grounds established (Article 9)
- Not the same order as typical PSC – before clear grounds
- Survey Requirements – Regulation E
- What is required of PSC Officer with respect to sampling / indicative analysis
- Opportunities for abuse?
- Why cannot simply accept type approval?
- More stringent requirements regionally
Enforcement Regime
Port State Control

- Initial inspection
- Documentation
- IBWM Certificate
- BWMP / Approved by Administration
- Type test certificate / appropriate environment
- Ballast Water Record Book – Electronic records from BWMS
- D-1 Sampling / Salinity
- D-2 Monitoring / Indicative
- D-2 Detailed
Correspondence Group on Port State Control

- Terms of Reference at last FSI
- Based on Paris MOU work to date
- To report to IMO July 2014
- Paris MOU. Japan, Canada primary drivers
- Include results of Assembly Resolution
- Include decision to implement with trial period on sampling for enforcement (2-3 years)
Guidance on BW Sampling and Analysis for Enforcement

- Sampling and analysis procedures are to be no more stringent than what is required for Type Approval (none provide greater resolution than current certification testing)
- Applies once BWM Convention in force
- Refrain from applying criminal sanctions or detaining ship based on sampling alone
- Length of trial period 2-3 years
- Encouraged Member States to begin using sampling and analysis procedures
- All other PSC in force
- Reflects current state of technology
Input of technological advances in both Sampling and Analysis into Guidance

- Protocols is currently available to provide a representative sample of the whole discharge
- Sampling technology is available to obtain a replicable and representative sample
- Technology is available to quickly and accurately analyze samples
- Statistic certainty can be provided for indicative samples