

Ballast water management

Our Position

IACS will, within the IMO framework, contribute to developing practical measures and seeking globally consistent implementation of the BWM Convention during the Experience Building Phase that was established to develop improvements to the Convention.

IACS also consider that technical challenges with regard to retrofit, engineering, potential safety implications (ship's stability due to insufficient capacity of BWMS, fire safety of BWMS, etc.) and efficient surveys on-board are to be identified and adequately addressed firstly in IMO instruments or otherwise in IACS resolutions.

BACKGROUND

Considering that challenges may arise during the implementation of the BWM Convention that were not foreseen at the time of its adoption, MEPC 71 adopted resolution MEPC.290(71) establishing an Experience-Building Phase associated with the Convention.

Recognising that due considerations should be further given to the following areas, IACS will continue to be involved in the discussion of those;

- Implementation of the Convention and the associated Code, Guidelines and Guidance:
 - Amendments to the Convention and/or the Code in conjunction with BWMS commissioning during the initial survey (survey item (BI) 1.1.3.20 in the 2019 Version of the HSSC Survey Guidelines)
 - Application of regulation B-3 to ships not subject to IOPP survey
 - Revised guidance on ballast water sampling and analysis and analytical procedures for sampling and analysis
 - Revised Guidance for the commissioning testing of ballast water management systems
 - Developing Guidance for the application of the BWM Convention to specific ship types
 - Developing Guidance for the application of the BWM Convention to ships operating at ports with challenging water quality
 - Standardisation of ballast water compliance monitoring devices
- Risk of fire and/or explosion caused by BWMS, for hazardous materials stored and/or hazardous products generated by the system:
 - Hazardous area definition and use of electrical equipment
 - Suitability of fire fighting system for stored material and generated products
 - Appropriateness of the materials or equipment contained within the space relative to the fire risk categorization of that space
 - Possible chemical reactions and suitable coating for chemical storage tanks that must be considered in addition to the presence of chemicals in assessing the hazards of ballast water treatment systems
 - Spread of hazardous materials/products also caused by possible breakdown of BWMS (corrosion, miss-operation and lack of management)
 - Pollution due to spillage of hazardous materials
- Survey issues:
 - Implementing efficiently the BWM.2/Circ.70/Rev.1 "2020 Guidance for the Commissioning Testing of Ballast Water Management Systems" in the associated survey guidance.
 - Considering any other issues regarding the commissioning on-board surveys to BWMS such as ship plan approval, installation, maintenance after installation and testing items to be focused.

IACS POSITION

IACS holds the positions that:

- IACS will monitor the implementation of the Convention so as to identify practical challenges,
- The BWM Convention and its associated IMO instruments need to be continuously reviewed with a view to developing significant improvements,
- With respect to survey and certification, IACS will continue to be involved in the discussion of those at IMO, and
- If deemed necessary, IACS intends to develop and implement IACS resolutions to prevent that ship's safety is impaired due to installation/operation of BWMS.

SUMMARY OF WORK CARRIED OUT BY IACS ON THIS ISSUE TO DATE

1. IACS URs/UIs/PRs or Recs

- IACS UR M74 "Installation of Ballast Water Management Systems" (Rev.2 June 2021) has been published and will come into force on 01 July 2022. Rev.2 of this UR cover the following aspects of BWMS:
 - Categorization of BWMS technologies and identification of the potential hazards for each BWMS category
 - Extension to all BWMS categories (arrangement of a single BWMS on tankers)
 - Clarification of the applicability and scope of the risk analysis and Classification certification
 - Tackling the issues raised by the challenge of retrofit installation onboard existing ships
- IACS UR Z17 "Procedural Requirements for Service Suppliers" (Rev.16 Aug 2021) has been updated to include the qualification requirements of the service supplier for BWMS commissioning test.
- A new IACS URF45 addressing the safety requirements of BWTS has been published in June 2021 and will come into force on 01 July 2022. This new UR has sections covering fire categorization, BW management room location, fire fighting and prevention, ventilation and personal equipment.

2. IACS participation in external fora such as JWGs, Tripartite, ESSF, etc.

- IACS participation in the IMO Correspondence Groups on the review of the Guidelines (G8) and on the Experience-Building Phase associated with the BWM Convention
 - IACS participation in the IMO Drafting Group on production of a manual entitled "Ballast Water Management – How to do it"
 - IACS participation at Tripartite 2018 "Onboard Surveys of BWMS"
 - IACS participation at Tripartite 2019 "Operational and Functional Experience with BWMS"
 - IACS participation in the informal Correspondence Group on verification protocol for BWMS compliance monitoring
 - IACS participation in IMO Correspondence Group on Development of a Protocol for Verification of Ballast Water Compliance Monitoring Devices
 - IACS participation in the EBP data collecting process and provided a consolidated data report in accordance with BWM.2/Circ.67/Rev.1 to WMU.
- ### 3. Recent IACS submissions to IMO
- MEPC 71/4/18 - Completion of the International Ballast Water Management Certificate
 - MEPC 72/3/9 - Proposed amendments to draft regulation D-3 of the BWM Convention and the draft Code for approval of ballast water management systems (BWMS Code)
 - MEPC 72/4/4 - Contingency plan in the ballast water management plan
 - MEPC 72/4/11 - New provision in the HSSC Survey Guidelines on validating the compliance of individual BWMS with regulation D-2 of the BWM Convention in conjunction with their commissioning during the initial survey (survey item (BI) 1.1.2.19)
 - MEPC 74/4/14 – Proposed amendments to the forms of the International Ballast Water Management Certificate (IBWMC) of the BWM Convention
 - PPR 8/11/2 - Comments on the draft protocol for the verification of ballast water compliance monitoring devices (CMDs)
 - MEPC 77/4/6 - Proposed unified interpretation of regulations E-1.1.1 and E-1.1.5 of the BWM Convention
 - MEPC 77/4/11 - Proposed unified interpretation of regulation B-3.10 of the BWM Convention

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