

NEWS

Newsletter from InBallast AS

November 1st 2016

MEPC 70 and new G8 implementation

Following Finland's ratification of the Ballast Water Management Convention in September, there has been a considerable build-up of expectations to MEPC's 70th session which took place at IMO in London last week as well as to the intersessional meeting the week prior, which task was to finalise the revision of the IMO Guidelines for approval of Ballast Water Management Systems. InBallast was a participant at both events as member of the Norwegian delegation.

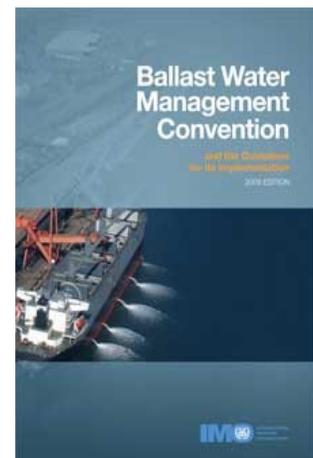
This newsletter summarises the core-topics that was up for discussion.

Regulation B-3 of the Convention relate to the implementation schedule of the requirements of the convention which enters into force in October 2017 following its ratification one year earlier. Regulation B-3 states that ship-owners will have to comply with the D-2 standard, meaning installing a ballast water treatment system at the first renewal of the IOPP Certificate after the convention enters into force. For some vessels, this does not leave much time for assessing the massive market of D-2 approved systems and planning for installation. Also, taking into consideration the financial reality of most shipping segments, strong voices had called for delaying the B-3 schedule.

Following a week-long discussion in the intersessional group, the new "revised" G8 guideline was presented at MEPC 70 and accepted as the new protocol for ballast water management system testing and approval. Its status as a volunteer tool was discussed and it is expected that it will become a mandatory instrument, and thus a Code – rather than a Guideline. The old G8 Guideline opened up for broad interpretations on many issues. The lack of ability or maybe just effort between Administrations to harmonise G8 approval processes and procedures is claimed to be the main cause of it taking some 12 years for the Convention to be ratified since its adoption in 2004.

Some speakers at MEPC 70 claimed that the existing G8 Guidelines have no credibility what so ever. A clear supposition from these delegates that the new G8 will "fix" all issues related to "first generation" ballast water treatment systems – was communicated very clearly. The same delegations called for a revised phase-in program (Regulation B-3) of the D-2 discharge standard – to allow treatment system vendors to re-certify their technologies on basis of the new Guidelines. This caused quite some debate in plenary. The MEPC Chairman showed great courage when he axed the discussion and postponed any further debate on the topic to MEPC 71, due in May next year. By that time, the shipping industry will have a number of USCG type approved systems to choose from. The presumption communicated by the industry ever since the USCG requirements were introduced some 4 years ago - that this standard hold the robustness the industry require, should make any amendments to Regulation B-3 absolutely obsolete!

So what is new in the revised G8 guidelines?





«The MEPC chairman’s decision to postpone the discussions of an alternative phase-in program to allow for BWMS vendors to re-certify according to new G8, make the discussion obsolete.

By the next MEPC, there will be several USCG type approved systems available - also meeting the requirements of the revised G8»

The new elements of G8

There are only really a few new elements of any substance.

- The revised guideline require testing in fresh water in addition to that of brackish and marine waters for systems to be approved without “saline” limitations. This is not new – and a number of technologies have already prepared and even tested for this – and using this as a marketing tool.
- An element, which is different from both the old G8 as well as the ETV protocol, is that there are no longer any limitations to minimum holding time during testing. There is however, a requirement to investigate the potential of regrowth. The outcome of this will be that there probably will be treatment systems ending up having limitations on holding time between ballasting and de-ballasting.
- The new G8 has introduced a new term; SDL – System Design Limitations. Systems certified in accordance with the new G8 – will have any identified SDL’s stipulated on the front page of the certificate. This may relate to operations in saline water, to temperatures and/ or to holding time, and there may possibly be other limitations also – hopefully making it easier for the ship-owner/ operator to choose the correct system for their needs. This is in practice not new and administrations have been required to validate system limitations in the “old” G8 as well as to communicate them on the certificate through resolution MEPC.228(65) from 2013.
- Systems must now also demonstrate their ability to perform over a temperature range – simplistically, the technology must demonstrate capacity to treat according to the ballast water discharge standard in cold waters (0 oC (2 oC in fresh water)) and warm waters (40 oC). For systems with residual oxidant discharge limitations – these must also be met over the range. Bench scale testing may be applied to demonstrate compliance.

InBallast is of the opinion that the old G8 was a solid approval reference as far as a guideline goes. As for all guidelines, it is the interpretation of the recommendations that determine its strength. The new guideline G8 is more prescriptive with respect to details of in particular the control and monitoring system, reporting, validation and independence of testing. There are also less prescriptive guidance such as how to validate temperature compliance and to some extent - we will still face the same challenge this time around, as we did before. The instrument is here – the administrations now need to find ways to harmonise its application, as many claimed the administrations failed doing

The way forward

It is likely that the ballast water vendors will be challenged by the shipping industry and thus – we will probably see the compliance with the new G8 being used actively in the market very shortly as the revised approval guidelines also accept the use of existing data.

A type-approved system according to the new G8 would still not guarantee that the treated ballast water would meet the discharge standard in all circumstances. InBallast would like to see the focus of the regulators and ship-owners to be shifted somewhat from that of exposing the treatment systems to the “perfect storm” of challenge conditions during type testing, at the cost of the vendors, to focusing on operational aspects of the treatment equipment after installation as well as on the quality of the treatment systems. Such operational aspects could be training, maintenance, installing the equipment correctly and management of residual water in tanks and pipes.

Implementation

The new G8 Guideline is available for use from **28. October 2016**.

IMO suggests that systems aiming for IMO certification after **October 2018** must apply the new Guideline.

Systems that are to be installed on board ships after **October 2020** must have been certified according to the new guideline.