

SUB-COMMITTEE ON IMPLEMENTATION OF IMO INSTRUMENTS 4th session Agenda item 3

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CONSIDERATION AND ANALYSIS OF REPORTS ON ALLEGED INADEQUACY OF PORT RECEPTION FACILITIES

Availability of adequate port reception facilities

Submitted by INTERCARGO and InterManager

SUMMARY

Executive summary: INTERCARGO and InterManager have been receiving feedback

from their members on the availability and adequacy of port reception facilities (PRFs) for cargo residues classified harmful to the marine environment (HME) and cargo hold washings containing such residues. This document provides some of the findings from that feedback, as well as that posted on the IMO GISIS Port Reception Facilities module, and puts forward proposals to improve

the availability and adequacy of PRFs.

Strategic direction: 7.1

High-level action: 7.1.3

Output: 7.1.3.1

Action to be taken: Paragraph 11

Related documents: III 4/3 and III 3/3/1

- 1 This document is submitted in accordance with paragraph 6.12.5 of the document on Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies (MSC-MEPC.1/Circ.5).
- Both the co-sponsors continuously receive feedback from their members on the ship-terminal interface at ports where ships call. This feedback, particularly from bulk carrier masters, includes a report on any difficulties that have been encountered with the availability and adequacy of port reception facilities (PRFs) for cargo residues classified harmful to the marine environment (HME) and cargo hold washing waters containing such residues as required by MARPOL Annex V.



- 3 Between October 2015 and June 2017, feedback regarding the availability and adequacy of port reception facilities for HME cargo residues and hold washing water has helped INTERCARGO in particular, to build up a database of port reception facilities in 251 ports located in 68 countries/regions and it includes 147 reports that were received between January and June 2017.
- Amongst the 251 ports referred to, only 31 of them, i.e. approximately 12%, were deemed to possess some level of PRFs. However, even amongst this 12% it was still reported that "adequacy" issues existed in some of them.
- 5 INTERCARGO has been encouraging its members to refer to the Port Reception Facilities module of the IMO GISIS for details of PRFs during which, feedback revealed:
 - .1 a port may have PRFs for other MARPOL Annexes but not for MARPOL Annex V. For example, one port listed in IMO GISIS has eight PRFs; but no one accepts garbage as defined by MARPOL Annex V;
 - .2 a port may have PRFs but not all of them can take garbage as defined by MARPOL Annex V. For example, one port has 65 PRFs, of which only five accept garbage as defined by MARPOL Annex V; and
 - .3 a port may have PRFs that accept garbage as per MARPOL Annex V; however, these MARPOL Annex V reception facilities are not always able to take HME cargo residues and washing water. For example, in one port possessing 29 PRFs, only one of those PRFs accepts garbage under MARPOL Annex V though with the note "20 trash bags per vessel", from which it can be concluded that even it is unable to receive cargo residues and hold washing water. Another example listed is that of a port accepting garbage, qualified by the notation "tank truck and portable tank", which would suggest an inadequacy to receive cargo residues and hold washing waters.
- The volume of cargo hold washing water is not insignificant, indeed for Handymax and Panamax size bulk carriers, volumes of washing water can be up to 500 m³ and 600 m³, respectively. Additional feedback from members indicates that the following could improve levels of adequacy:
 - .1 HME cargo residues and hold washing water containing such residues could be discharged from the ship to floating plants in ports such as barges, in order to reduce discharge times rather than relying on trucks and portable tanks;
 - .2 HME cargo residues and hold washing water containing such residues should be received without additional fees or, if not, charges should at the very least be at a reasonable level, reflecting the service provided and not as a disincentive to use the service; and
 - .3 HME washing water treatment plants should be located as close as possible to ports or PRFs.

Proposals

- The availability of adequate port reception facilities is crucial in enabling ships to comply with the requirements of MARPOL Annex V, thus flag States should be encouraged to make every effort to request reports from ships and to notify IMO GISIS where such facilities are alleged to be inadequate.
- 8 Frequent updates, analysis and review of existing data contained within GISIS, on the availability of port reception facilities, should be further strengthened.
- 9 IMO should be encouraged to consider the development of a "model port reception facilities" concept.
- 10 IMO could perhaps encourage Member States to provide incentives in order for ports and terminals to increase investment in the provision of adequate PRFs.

Action requested of the Sub-Committee

11 The Sub-Committee is invited to consider this document, especially the proposals contained in paragraphs 7 to 10 and take action as deemed appropriate.