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“Ballast Water Management Legislation Implementation: Practical problems in need of an answer”

INTERCARGO welcomes and supports the Ballast Water Management (BWM) international initiatives and legislation, however it should be recognised that their implementation needs to be made in the most effective and practical manner possible.

Ahead of the International Maritime Organisation (IMO) BWM Convention entry into force on 8 Sept. 2017, INTERCARGO welcomes the purpose and the focus of the Convention. However, it believes that Regulation should take into account the challenges faced by the existing bulk carriers, the largest segment of world shipping by deadweight tonnage. A newbuilding vessel case is totally different to retrofitting an existing vessel, while a bulker carrier has unique requirements to those of other ship types.

INTERCARGO expresses its concerns about the practical problems faced by its members for retrofitting the existing dry bulk ships with Ballast Water Treatment Systems (BWTS) in two papers submitted for consideration at the next meeting of the IMO Marine Environment Protection Committee (MEPC 71) in July 2017:

Paper MEPC 71/4/19 (submitted by INTERCARGO and InterManager) - Challenges faced by bulk carrier owners and operators: The challenges concern retrofitting BWTS on those vessels that use gravity discharged Top Side Tanks and the paper makes a practical proposal to accommodate the use of these specific tanks, which is complementary to and notwithstanding the Committee's discussion on the timeline for implementation of the BWM Convention.

Paper MEPC 71/INF.20 (submitted by INTERCARGO) - Information on the technical and operational challenges of retrofitting ballast water treatment systems on existing bulk carriers: This paper describes some of the other challenges (such as additional electrical powering requirements and availability of space) faced by the bulk carrier industry.

The list of challenges varies from the aforementioned incompatibility of the highly energy efficient gravity discharge, power and space requirements, and ballasting capacity to the availability of systems approved by the United States Coast Guard (USCG). The industry would, therefore, welcome a more flexible and pragmatic transition from the first USCG approved BWTS being disclosed in December 2016, until more proficient technologies and approved systems are made available. This will be assisted by the revised IMO G8 guidelines being brought closer to the USCG’s testing regime and the USCG granting extended compliance dates.

The INTERCARGO Secretariat has produced an open article on BWM, providing its insights on the current relevant developments on the implementation of the IMO BWM Convention and US legislation that are of major concern to the shipping community and especially to INTERCARGO members. The paper is available here.

About INTERCARGO: The International Association of Dry Cargo Shipowners was established in 1980 with the objective of giving a voice to shipowners, managers and operators of dry cargo vessels and better representing this shipping sector. Our Members commit to a safe, efficient, high quality and environmentally-friendly dry cargo shipping industry. INTERCARGO is an accredited NGO observer at IMO and a member of the Round Table of International Shipping Associations. INTERCARGO considers that free and fair competition in the shipping industry is of fundamental importance and this serves as its prime principle.

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