

Media Release – 29 June 2017

**“Ballast Water Management:
Regulation should not distort the market’s level playing field”**

In view of the International Maritime Organisation’s (IMO) Marine Environment Protection Committee upcoming meeting (MEPC 71 during 3-7 July 2017), INTERCARGO re-iterates its welcoming the entry into force of the Ballast Water Management (BWM) Convention in September. Aspiring to the Convention’s **effective implementation**, our Association will be making MEPC 71 Committee **aware of the critical challenges** faced by the bulk carrier segment of the industry.

The world bulk carrier fleet is by far **the largest single sector by deadweight tonnage** and a significant proportion of it utilizes the **highly energy efficient gravity discharge system** for the topside ballast water tanks. **Topside tanks are an integral part of bulk carriers.**

However, retrofitting a Ballast Water Treatment System onto a Bulk Carrier that uses gravity discharge for the Top Side Tanks would need to overcome major technical challenges. The changes require substantial modifications to the construction of these bulk vessels. By removing gravity discharge systems, their most significant advantage would be lost, namely that of **high energy efficiency**. **INTERCARGO proposes for existing bulk carriers only**, the use of "extended ballast water exchange" to be implemented **solely for these tanks**, with the remaining ballast water treated by a system to be fitted on all vessels (the relevant **Paper MEPC 71/4/19 - submitted by INTERCARGO and InterManager** – can be read [here](#)¹).

The **regulation in place should respect the highly capital intensive nature of the industry** and **avoid distorting the market’s level playing field** by marginalising thousands of viable and quality bulk carriers. In this respect, INTERCARGO sees the above proposal as **pragmatic and constructive**.

¹ <https://www.intercargo.org/en/work/environmental-legislation/495-intercargo-submissions-to-imo-mepc-71.html>

In addition to the difficulties described in the above paper, INTERCARGO has also submitted **Paper MEPC 71/INF.20** which informs of some of the other significant technical and operational challenges faced by bulk carriers (this paper can also be read [here](#)²).

The INTERCARGO Secretariat produced an **open article on BWM** back in April, that is available [here](#)³.

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.

Contact details:

Post: 9th Floor, St Clare House, 30-33 Minories, London, EC3N 1DD, UK

Phone: +44 (0) 20 7977 7030

Email: info@intercargo.org

² <https://www.intercargo.org/en/work/environmental-legislation/495-intercargo-submissions-to-imo-mepc-71.html>

³ <https://www.intercargo.org/en/news/industry-development/485-bwm-legislation-implementation-possibilities-and-impossibilities.html>