

MARINE ENVIRONMENT PROTECTION  
COMMITTEE  
67th session  
Agenda item 2

MEPC 67/2/8  
30 July 2014  
Original: ENGLISH

## HARMFUL AQUATIC ORGANISMS IN BALLAST WATER

### Guidance on stripping operations using eductors in relation to the practical implementation of the 2004 BWM Convention

Submitted by the Marshall Islands, ICS, BIMCO, INTERTANKO, CLIA,  
INTERCARGO and WSC

#### SUMMARY

*Executive summary:* This document presents and discusses issues relating to the *draft Guidance on stripping operations using eductors* and proposes changes to the text in order to ensure effective and pragmatic practical implementation of the BWM Convention in relation to ballast stripping operations carried out on board ships

*Strategic direction:* 2

*High-level action:* 2.0.1

*Planned output:* 2.0.1.2

*Action to be taken:* Paragraph 11

*Related documents:* MEPC 66/WP.1, MEPC 66/11/4; PPR 1/16 and BLG 17/INF.16

#### Introduction

1 PPR 1 invited MEPC 66 to consider the *draft Guidance on stripping operations using eductors*, hereafter referred to as the "draft Guidance", with a view to finalization and subsequent dissemination as a BWM circular (paragraph 2.7 of document MEPC 66/11/4 and paragraph 5.17 and annex 6 of document PPR 1/16).

2 MEPC 66 considered the draft Guidance, but owing to serious concerns being expressed with regard to paragraphs 8 to 11 of the draft Guidance, and recognizing that there had not been sufficient time to submit commenting documents on the outcome of PPR 1 to MEPC 66, the Committee decided to defer consideration of the matter to MEPC 67.

## Discussion

3 The authors are grateful to the PPR 1 drafting group for developing the draft Guidance and thanks MEPC for deferring consideration of this important matter to MEPC 67, thereby allowing sufficient time to comment in writing on the proposal. The authors, as stated verbally at MEPC 66, continue to be concerned with the draft Guidance as it is not considered to provide the practical and pragmatic way forward that industry needs to enable smooth and effective application of the Ballast Water Management (BWM) Convention. It is felt that the draft Guidance as currently drafted simply provides an inflexible interpretation of the provisions of the BWM Convention by demanding the opportunity to sample every last drop of ballast water at any time.

4 It needs to be recognized that, as the introductory paragraph of the draft Guidance makes clear, the use of eductors is to drain the very last of the ballast water remaining following loss of suction of the main ballast pumps, and **not** to discharge the whole contents of a tank.

5 As has been agreed by the Committee, sampling for compliance should be from samples that are representative of the whole discharge; samples taken during the stripping operation cannot be representative. Indeed, as presented in the expert document BLG 17/INF.16, "sequential samples taken at the very beginning and at the very end during a ballast tank being emptied are unlikely to give representative samples of the living organism concentration". The problem of debris damaging the delicate plankton nets, used in testing, also needs to be taken into account. For this reason, sampling at the very beginning or end of discharge of a tank should not be carried out.

6 As should be recalled, MEPC 64 agreed that sampling and analysis procedures for port State control should be no more stringent than what is required for type approval of ballast water management systems (see paragraph 2.36 of MEPC 64/23). Noting that paragraph 7.1 of Guidelines (G8) states in relation to "Sampling facilities", that "The BWMS should be provided with sampling facilities so arranged in order to collect representative samples of ship's ballast water" and noting further that once again Guidelines (G8) employ the concept of "representative samples", the authors believe that sampling during stripping operations is not appropriate and would in fact, if mandated, be a requirement that is far more stringent than is required for type approval.

7 The draft Guidance requires that sampling points are appropriately arranged to allow water to be sampled before mixing with eductor water, however, the nature of stripping operations using an eductor means that at any given time the contents of the piping prior to the eductor inlet will consist of varying sized pockets of air and "slugs" of ballast water being drawn to the eductor by the vacuum it produces. For this reason, from a technical perspective, reliable samples simply cannot be taken by normal means from the stripping lines prior to the eductor.

8 The authors urge a pragmatic view to be taken of the use of eductors for stripping to avoid unnecessary complication of ballasting operations on ships using this means to ensure ballast tanks are empty. Ballast tanks being completely empty at the conclusion of deballasting operations is not only important from a cargo carrying capacity perspective, but more essentially the tanks need to be empty for safety reasons, i.e. to ensure no unnecessary free surfaces exist in ballast tanks that will reduce the intact stability and consequently the residual damage stability of the ship.

9 The ICS proposed the wording, currently contained in paragraph 11 in the draft Guidelines, which the authors believe is effectively negated by the new text of paragraphs 8, 9 and 10 as developed by the drafting group at PPR 1.

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## Proposal

10 Following the discussions at PPR 1, and having studied the draft Guidance in detail, the authors propose the following:

- .1 to amend the text in paragraph 11, as follows, so that it provides further clarity to the guidance:

"11 When ballast water is ~~treated with a disinfectant chemical or other conditioning treatment at uptake only and the monitored discharge proves there is no need for the application of a neutralizer chemical to condition the discharge for environmental acceptability managed by a system that upon discharge meets the required standard, as may be verified according to article 9.1(c) of the Convention and Guidelines (G2)~~, then following the discharge of the bulk of the ballast water from a tank or group of tanks through the ballast water main system, it is accepted that the remainder of the ballast water in the tanks will also be compliant and may be discharged via an eductor system using local water as driving water without additional management or monitoring";

- .2 that paragraphs 8, 9 and 10 of the draft Guidance are removed or completely rewritten to avoid misunderstanding; the present text is in conflict with any practical or pragmatic appreciation of actual shipboard operations and understanding of this very important matter; and

- .3 notwithstanding the specific proposals detailed in paragraphs 10.1 and 10.2 above, the authors recommend to the Committee that it requests a full review of the draft Guidance to ensure its practicality and fitness for purpose. Equally, the authors believe a simple statement from the Committee in accordance with paragraph 10.1 above may be considered sufficient and negate the need for a BWM circular on this subject to be developed and disseminated.

## Action requested of the Committee

11 The Committee is invited to consider the proposals contained in this document and decide as appropriate.

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