

Report of PPR 8

Sub-committee on Pollution Prevention and Response
22nd – 26th March 2021
International Maritime Organization (IMO), Virtual meeting

ITF delegation

ITF Accredited Permanent Rep.	Branko Berlan
Expert	Tracey Mayhew
Expert	Oscar Lindgren
Adviser	Odd Rune Malterud
Adviser	Sang-hee Lee
Adviser	Rossen Karavatchev
IMO liaison assistant	Jihyeon Gina Kim



1. Review of the Biofouling Guidelines: *The 2011 Guidelines for the Control and Management of Ships' Biofouling to Minimize the Transfer of Invasive Aquatic Species (Resolution MEPC.207(62))*

The purpose of the Guidelines is to provide a universally consistent approach to minimise the risk of transferring invasive aquatic species from ships' biofouling as well as to increase ship's energy efficiency, which contribute to lowering fuel consumption. As the industry has experienced difficulties to certify ships' biofouling, the review of the Guidelines commenced in 2020 to enhance the applicability.

Human element involved in ships' fouling are wide, encompassing the following; flag and port Administrations, ship crew, ship charterers and cargo owners, ship operators and ship owners, ship designers, shipbuilders, hull cleaning and maintenance operators, port authorities, ship repair service providers, dry-docking and recycling facilities, classification societies, anti-fouling paint manufacturers and suppliers so on so forth.

As for ship's crew, in order to enhance the applicability of the Guidelines, the clarity on responsibilities and roles is imperative here, such as in cleaning and inspection.

Further work of the Correspondence Group on the Review of the Biofouling Guidelines

- The effectiveness and applicability of Guidelines;
- The anti-fouling system manufacturer to share details for the biofouling management plan (BFMP);
- Definition of proactive cleaning and hull cleaning;
- Improving the definition of "in-water cleaning" and "niche areas"; and
- Adding a qualitative definition and quantitative scale of macrofouling and microfouling.

2. Development of a standard for the verification of ballast water compliance monitoring devices

The most appropriate way to standardise the verification of the many existing ballast water compliance monitoring devices is under discussion.

It is essential to know the system onboard a ship and the safety protocol that they are serving during port State control (PSC) inspections. Verification could be perceived as an Administration's mere realm. However, consequences onboard resulted from the verification practice, therefore this must not be overlooked.

Further work

- A Correspondence Group on *Development of a Protocol for Verification of Ballast Water Compliance Monitoring Devices* was established and will continue this work.

3. Reduction of the impact on the Arctic of emissions of Black Carbon from international shipping

The Black Carbon emissions is deeply connected to ship's engine system, maintenance and ship's entire operation. Thus, it is important for ship's crew to have a clear understanding and knowledge on technical installation onboard and development of the IMO's emission reduction measures.

The ways to reduce the emissions presented were:

- To avoid the use carbon-based fuel in the Arctic;
- To equip ships with advanced fuel combustion technology;
- The use of LNG-fuelled ships where possible;
- To use distillate fuels; and
- To be aware of the different Black Carbon emissions from medium/high speed 4-stroke engines and slow speed 2-stroke engines.

Further work

- develop measures to reduce the impact on the Arctic of Black Carbon emissions from international shipping, taking into account the identified candidate control measures
- consider the recommended Black Carbon measurement methods (FSN, PAS, LII) to be used in conjunction with regulations to control Black Carbon emissions from marine diesel engines
- standardise sampling, conditioning and measurement protocol

4. Revision of MARPOL Annex IV and associated guidelines to introduce provisions for record-keeping and measures to confirm the lifetime performance of sewage treatment plants

It is common knowledge that sewage treatment plants measures are critical, in particular for passenger and cruise ships, taking into account the nature of their business.

The Sub-committee has been preparing draft amendments to MARPOL Annex IV and 2012 *Guidelines on Implementation of Effluent Standards and Performance Tests for Sewage Treatment Plants*. The amendments will be finalised in 2023 for entry into force later.

New requirements to note at this stage are:

- The introduction of an E-record book, a currently drafted amendment to MARPOL Annex IV, Reg I/18 to reduce administrative burden for seafarers;



- Effluent sampling point as well as Discharges of sewage sludge and effluent; and
- Requirements to develop a ship-specific SMP and to keep a Sewage Record Book (SRB).

Further work of the Correspondence Group on Amendments to MARPOL Annex IV and Associated Guidelines

- Adequate port reception facilities
- Requirements for existing ships, a new proposed appendix III
- “grandfathering” provisions for existing ships to be exempted from new requirements and Life time performance questioning on existing systems
- Policy decision on testing, the form of the applicable testing regime including procedures for executing the commissioning test
- Reviewing the log of the indicative monitoring
- The implication on ships energy consumption when running sewage treatment plants particularly for passenger and cruise ships
- Consideration on the development of associated templates or guidelines in relation to sewage recordkeeping and sewage management plan

5. Follow-up work emanating from the Action Plan to address marine plastic litter from ships

The ITF supports that development of international standards on this issue is necessary and prompt action is urgently needed to avoid any negative impact on the coastal community.

With the IMO recognising the urgency of this work, the Sub-committee agreed to establish a Working Group in the next session to accelerate the work.

Further work

- To address losses or discharges of fishing gear, including draft amendments to reporting requirements under MARPOL Annex V regulations on the prevention of pollution from ships by garbage
- Fishing gear marking data collection methods and official depository body
- Existing other regulatory instruments on fisheries from other UN agencies

6. Development of measures to reduce risks of use and carriage of heavy fuel oil (HFO) as fuel by ships in Arctic waters

The draft guidelines were developed to assist Administrations on the coastlines of which border on Arctic waters to implement measures at national level to reduce the risks associated with the use of HFO as fuel and its carriage for use as fuel by ships in Arctic waters until 2029.

The draft provides recommendations on measures to reduce the risk of spills for operators of ships planning voyages in the Arctic while using or carrying HFO for use as fuel.

Further work

- the Sub-Committee on Navigation, Communications and Search and Rescue (NCSR), to review navigational and communication measures
- the Sub-Committee on Ship Design and Construction (SDC), to review concerning the location of fuel tanks
- the Sub-Committee on Human Element, Training and Watchkeeping (HTW), to review sections on training and onboard familiarisation



Action point

With growing concerns on environmental soundness, it is imperative for maritime workers onboard to be prepared appropriately and promptly with adequate information. The global maritime professionals are invited to note the followings:

- To protect the environment, shipboard environment must also be protected.
 - “Onboard familiarisation” is an essential culture, the implementation of a robust system and common understanding amongst all stakeholders are the way to practice to implant the culture deeply.
 - The industry also must see that overwhelming dependence on digitisation, digitalisation and automation enhances safety when the system is well monitored, controlled and fixed.
 - New requirements to protect marine environment should be construed as an opportunity to show the world the truly professional nature of maritime workers.
- Attend your government meetings on environmental protections and express the needs for the realistic instructions to comply with the IMO ambitions.
-
-

*Aforementioned IMO documents can be provided if requested.