



Technical Information

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To : Whom it may Concern

Subject : Summary Report on IMO Meetings Of Sub-Committee on Pollution Prevention and Response 4th Session (PPR 4)

Summary

This Technical Information summarizes the 3rd Session of the IMO Sub-Committee on Pollution Prevention and Response (PPR) was held from the 16 to 20 January 2017, at the IMO headquarters in London.

Information

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2. The following agenda are discussed during the Sub Committee meeting :

| Agenda Number | Topic |
|---------------|---|
| 2 | Decisions of other IMO bodies |
| 3 | Safety and pollution hazards of chemicals and preparation of consequential amendments to the IBC Code |
| 4 | Review of MARPOL Annex II requirements that have an impact on cargo residues and tank washings of high viscosity and persistent floating products |
| 5 | Code for the transport and handling of limited amounts of hazardous and noxious liquid substances in bulk on offshore support vessels |
| 6 | Revised guidance on ballast water sampling and analysis |
| 7 | Review of the guidelines for approval of ballast water management systems (G8) |
| 8 | Production of a manual entitled "Ballast Water Management – How to do it" |
| 9 | Consideration of the impact on the Arctic of emissions of Black Carbon from international shipping |
| 10 | Development of standards for shipboard gasification waste to energy systems and associated amendments to regulation 16 of MARPOL Annex VI |
| 11 | Guidelines for the discharge of exhaust gas recirculation bleed-off water |
| 12 | Improved and new technologies approved for ballast water management systems and reduction of atmospheric pollution |
| 13 | Updated IMO Dispersant Guidelines (Part IV) |
| 14 | Updated OPRC Model training courses |

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| 15 | Unified interpretation to provisions of IMO environment-related Conventions |
| 16 | Use of electronic record books |
| 17 | Revision of the 2011 SCR Guidelines |
| 18 | Biennial agenda and provisional agenda for PPR 5 |
| 20 | Any other business |

3. The Agenda above are several technical issues discussed during the meeting. A brief coverage among the issues are expressed in the attached document.

More info

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BRIEF INFORMATION OF IMO MEETING ON POLLUTION PREVENTION & RESPONSE SUB COMMITTEE 4TH SESSION (PPR 4)

A. SAFETY AND POLLUTION HAZARDS OF CHEMICALS AND PREPARATION OF CONSEQUENTIAL AMENDMENTS TO IBC CODE (AGENDA ITEM 3)

PPR 4 reviewed the report of ESPH 22 and several issues regarding the draft revised chapter 21 of IBC Code. The discussion points are as follows:

The report of ESPH 22

The Sub-Committee invited industry to submit more information on hydrocarbon waxes, paraffin-type products, and mineral oil to GESAMP/EHS 54 in order to harmonize the data of this product in the IBC Code and to review the component factor for mineral oils for mixture calculations.

Evaluation of cleaning additives

There are 12 from 14 products that met the criteria as set out in MEPC.1/Circ.590 on Revised Tank Cleaning Additives Guidance Note and Reporting Form. These 12 products will be included in the MEPC.2/Circular on the Provisional classification of liquid substances transported in bulk and that will be prepared by ESPH 23, in order to be used for tank cleaning activities.

Review of MEPC.2/Circular – provisional classification of liquid substances transported in bulk and other related matters

According to MEPC.2/Circ.22, there are 41 product tripartite agreements expire on December 2017. In order to provide enough time for manufacturers to have their products assessed in GESAMP/EHS, Member States are invited to take action in order to avoid any interruption in the carriage of this product beyond their expiry date.

The revision proposed to the IBC Code (Chapters 17, 18 and 21)

The revision proposed to the IBC Code covers Chapter 17 (Summary of Minimum Requirement), Chapter 18 (List of Chemical to Which the Code Does Not Apply) and Chapter 21 (Criteria for Assigning Requirements for Products Subject to the IBC Code). Particularly for Chapter 21, ESPH 22 was tasked to progress the revision, and consider the draft changes regarding toxicity ratings and how to deal with products that produce low concentration of vapour. The report of ESPH 22 then reviewed by PPR 4 and proceeded to the revision of the toxicity categorization. Another issue is regarding section 13.2.3, exemption for the case when the equipment for toxic vapour detection is not available. The administrative burden may arise due to the number of products that would require exemptions, either for Administration or Industry. With regard to this issue, PPR 4 invited proposals to ESPH 23 to address this.

PPR 4 agreed to the draft text for Chapter 21 and will forward to the Committee for approval and adoption. Meanwhile, Chapter 17 and 18 will be discussed further in ESPH 23.

Development of guidance/procedures for assessing and classifying products under Annexes I and II of MARPOL

The Working Group had agreed on a number of issues at ESPH 22 that should be addressed in the guidance, particularly on criteria regarding "reproducibility" to be used to differentiate between the mixtures covered by MARPOL Annex I and II. It also considered document proposing criteria for determining whether a product should be covered under MARPOL Annex I or II. Therefore, PPR 4 agreed with the following outputs to be discussed at ESPH 23:

- Flow diagram to assist in the assessment of new mixtures as MARPOL Annex I or II products;
- PPR Circular regarding the assessment process for determining whether products should be covered by MARPOL Annex I or II.
- MEPC Circular regarding the general information on the rationale and assessment for purposes of establishing tripartite agreements under MARPOL Annex II for such products.

B. REVIEW OF MARPOL ANNEX II REQUIREMENTS THAT HAVE AN IMPACT ON CARGO RESIDUES AND TANK WASHINGS OF HIGH VISCOSITY AND PERSISTENT FLOATING PRODUCT (AGENDA ITEM 4)

The discharge requirements relating to the cleaning and discharging of tank washings containing high viscosity and persistent floating product under MARPOL Annex II and the IBC Code were under review. Proposed amendments to MARPOL Annex II considered by PPR 3 and raised a number of issues.

Discussion:

- Concerns regarding the adequacy of reception facilities to receive the washings, the sufficiency of authorized surveyors to certify tank washings discharge.
- A phased approach of requirements in order to address these issues.
- Regarding vegetable oils, should it be exempted from the proposed amendment, taking into account that study on this issue is in progress.

PPR 4 prepared draft amendments to MARPOL Annex II on the definition of "persistent floater" and its prewash requirement. The draft amendments to IBC Code Chapter 16 and 21 were prepared in order to initiate the prewashing requirement in Chapter 17.

C. CODE FOR THE TRANSPORT AND HANDLING OF LIMITED AMOUNTS OF HAZARDOUS AND NOXIOUS LIQUID SUBSTANCES IN BULK ON OFFSHORE SUPPORT VESSELS (AGENDA ITEM 5)

Chronology of the issue of the Code:

- PPR 3 had established Working Group that made progress to the development of OSV Chemical Code.
- Correspondence Group which established by PPR 3 provided the text of the draft OSV Chemical Code to PPR 4.

- PPR 4 established Working Group on OSV Chemical Code to prepare: draft Assembly resolution for adoption, and final text of the OSV Chemical Code.

Decision made by PPR 4:

- Agreed to the draft Assembly resolution for adoption, and final text of the OSV Chemical Code, for approval by MSC 98 and MEPC 71, with a view of adoption by A 30.
- Noted the view of the Working Group that the OSV Chemical Code should be made mandatory in the future, and encourage interested IMO Member States to submit proposals for a relevant new output to the Committees after the adoption of the Code by the Assembly.

Brief overview of the draft of OSV Chemical Code:

- The Code has been developed for the design, construction and operation of offshore support vessels which transport hazardous and noxious liquid substances in bulk for the servicing and resupplying of offshore platforms, mobile offshore drilling units and other offshore installations, including those employed in the search for and recovery of hydrocarbons from the sea-bed.
- OSV Chemical Code has recommendatory nature, unless there was a direct quotation of any conventions or mandatory codes.
- Compliance is to be proved by possession of Certificate of Fitness with a period of validity not to exceed five years, and should have the same recognition as the certificate issued under regulation 7 of Annex II of MARPOL and regulations VII/10 and VII/13 of the 1974 SOLAS Convention, as amended.
- Concerning the application of the OSV Chemical Code to existing vessels, The OSV Chemical Code required that existing OSVs may be permitted to carry products identified as requiring Ship Type 2 carriage requirements in the IBC Code, provided that they comply with the requirements of the Code except for the stability requirements in chapter 2, and subject to the satisfaction of the Administration.
- Related provisions to OSV Chemical Code are, among others: MARPOL Annex II, SOLAS 1974, IBC Code, IGC Code, IMDG Code, IS Code, and Guidelines for the Design and Construction of Offshore Supply Vessels.

D. REVISED GUIDANCE ON BALLAST WATER SAMPLING AND ANALYSIS (AGENDA ITEM 6)

As the BWM convention is about to become enter into force 8 September 2017, there are few issues that are still being discussed and dealt with in agenda item 6, 7 and 8. Sub-Committee was instructed to develop a circular providing sampling and analysis guidance.

Guidelines for sampling of ballast water (G2)

There was a proposal for amending the Guidelines on ballast water sampling (G2) (resolution MEPC.173(58)) to incorporate a standard sample port. However, it was mentioned that an ongoing work in revising the Ballast Water Sampling Standard ISO 11711-1 is also being conducted at the time being.

Some delegations expressed that there is no need for establishing another prescriptive regulation as an ISO standard deemed to be enough to cover the issues. The Sub-Committee then highlighted that proposal for consideration shall be taken to PPR 5, and let the Committee approve a new output.

Uncertainties related to ballast water sampling for compliance

MEPC 70 has highlighted uncertainties to Ballast Water Sampling for compliance through documents MEPC 70/4/16. Although several delegations supported amending Article 9 of BWM Convention in reflection four-stage approach of the Guidelines for Port State Control, the Sub-Committee did not agree to this proposal. Nevertheless, some views of the said documents on instrumental monitoring tools installed in association BWMS is being taken into consideration.

Extension of target completion date

Sub-Committee requested MEPC 71 to extend the target completion date related to guidance on ballast water sampling and analysis to 2019.

E. REVIEW OF THE GUIDELINES FOR APPROVAL OF BALLAST WATER MANAGEMENT SYSTEMS (G8) (AGENDA ITEM 7)

Determination of viability of organisms

The Sub-Committee discusses the issue on determining the viability of organisms in the 10 to 50 μm size class. Support in general was given with regard to the proposed analysis methods (FDA/CMFDA + Motility and MPN Dilution Culture + Motility), while noting that additional methodologies may also exist. Sub-Committee agreed on the need for generic guidance on the subject of determination of viability organisms.

System Design Limitations

The discussion of the options for matrix on System Design Limitations (SDL) for type approved BWMS has a strong support, however, general concern was that it is not necessarily must be in the form of matrix. Hence, it was raised that the use of SDL is somehow may strengthen the information in G8.

Standardized format for operation logging data

Although the needs of standardized formats for operation logging data of BWMS existed, the Sub-Committee could not conclude on the matters. Therefore, welcomes submission for a future session to facilitate smooth monitoring and implementation of ballast water performance standard, as well as the self-monitoring parameters.

F. PRODUCTION OF A MANUAL ENTITLED "BALLAST WATER MANAGEMENT – HOW TO DO IT" (AGENDA ITEM 8)

The manuals acts as a separate guidance for Administration, flag states and other stakeholders who wish to implement and enforce Ballast Water Management Convention. Sub-Committee has approved them in general, and the documents will be finalized by MEPC 71 and be published upon it.

G. STANDARDS FOR SHIPBOARD GASIFICATION OF WASTE SYSTEMS AND ASSOCIATED AMENDMENTS TO REGULATION 16 OF MARPOL ANNEX VI (AGENDA ITEM 10)

The draft standards for shipboard gasification of waste systems and associated amendments to regulation 16 of MARPOL annex VI has been developed by a correspondence group established in PPR 3.

Draft standards for shipboard gasification waste to energy systems

Shipboard gasification waste to energy system means the system that converts solid or liquid waste into energy. The Standards covers all aspects from design until testing and operation of such system. PPR 4 agreed that the draft Standards needed to be revised, particularly on the neutrality of the technology required.

Draft amendments to regulation 16 of MARPOL Annex VI

There are several issues and views regarding the necessity of amending the regulation due to the consideration of regulation 4 that covers an equivalent means. Furthermore, other provisions such as the IAPP Certificate may be required to be amended. The correspondence group will continue work on this with target completion date on 2019.

H. GUIDELINES FOR THE DISCHARGE OF EXHAUST GAS RECIRCULATION BLEED-OFF WATER (AGENDA ITEM 11)

In order to comply with Tier III NO_x of regulation 13 MARPOL Annex VI, Exhaust Gas Recirculation (EGR) can be employed. The working principle of EGR is by directing part of the exhaust gas into engine air intake after cooling process, in order to change the combustion parameters that will reduce the NO_x emissions. The condensate resulting from the cooling process will be discharged as, so called, bleed-off water.

Discussion

Guideline regarding the discharge of bleed-water was discussed at MEPC 68. In PPR 4, the question raised was either the bleed-off water should be treated as MARPOL Annex I or MARPOL Annex VI wastes. The Sub-Committee then agreed that they should be treated as MARPOL Annex VI wastes. Consequently, as MARPOL Annex VI is not referenced in Polar Code, the requirement for ships operating in polar water should be more stringent. Moreover, the view whether the Guidelines should include survey and certification provisions or not still could not be resolved by the group.

Overview of the Guidelines:

- Bleed-off water definition: water to be discharged directly, or via a holding tank, to the sea from an EGR water treatment system.
- Discharge of the Bleed-off water: Two cases, one for using regulation 14 non-compliant fuel, the other using regulation 14 compliant fuel. Discharge in the polar regions is not allowed.
- Disposal of residue: residue has to be delivered to shore reception facilities.
- Additives: if additives are used, an assessment is required unless the substances specified in the guidelines are used.

- Survey and Certification: A dedicated section for survey and certification was inserted.

I. REVISION OF THE 2011 SCR GUIDELINES (AGENDA ITEM 17)

The discussion mainly focused on:

- The view that scheme A and scheme B of the certification is not equivalent due to the additional documentation needed that often considered to be an intellectual property right. The “share point” concept then being proposed as a solution. However, due to the actual operation is considered to be more problematic, the Group agreed not to go forward with this proposal.
- The revision of the 2011 Guidelines addressing additional aspects to the NOx Technical Code 2008 with regard to particular requirements related to marine diesel engines fitted with Selective Catalytic Reduction Systems. The draft 2017 of this Guidelines was agreed, will be forwarded to MEPC 71 with a view to adoption.
- A detailed technical review of the 2011 SCR Guidelines.

J. ANY OTHER BUSSINESS (AGENDA ITEM 20)

Development of guidelines for the use of more than one Engine Operational Profile (Map)

The proposal for developing a guideline for the use of more than one Engine Operation Profile (Map) was considered at MEPC 69. The detailed consideration was brought by the US by providing more information regarding Engine Operational Profiles (Maps) and why the use of more than one Map for engine certification should not be allowed.

Several points on the discussion as follows:

- The use of more than one Map would lead to a relaxation of NOx emission requirements.
- Multiple Maps are already in use, however, the provisions set out in MARPOL Annex VI and the NOX Technical Code 2008 are not clear.
- The use of multiple Maps can reduce CO2 emissions while NOx emissions would increase, therefore, further consideration of the implications is needed.

Consistent implementation of the 0,50% sulphur limit under regulation 14.1.3 of MARPOL Annex VI

MEPC 70 had confirmed that the effective date of implementation for 0.50% sulphur content of fuel oil requirement is 1 January 2020. There are several concerns regarding the implementation of the requirement and MEPC 70 instructed the Sub-Committee to draft a justification for a new output regarding this matter. Subsequently, PPR 4 prepared the draft justification for new output on consistent implementation of regulation 14.1.3 MARPOL Annex VI.