

SUB-COMMITTEE ON POLLUTION
PREVENTION AND RESPONSE
8th session
Agenda item 7

PPR 8/7/8
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**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**

Comments on document PPR 8/7

**Submitted by India, Japan, Liberia, Palau, Panama, Republic of Korea, CLIA, BIMCO
and ICS**

SUMMARY

Executive summary: This document provides comments on the report of the Correspondence Group on Amendments of MARPOL Annex IV and Associated Guidelines (PPR 8/7). The co-sponsors propose re-establishing the Correspondence Group for further discussion on concrete measures to improve the effluent quality from sewage treatment plants installed on existing ships.

Strategic direction, if applicable: 1

Output: 1.26

Action to be taken: Paragraph 12

Related documents: PPR 8/7; MEPC 74/14 and MEPC 71/INF.22

Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the document on *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.2) and provides comments on the report of the Correspondence Group on Amendments of MARPOL Annex IV and Associated Guidelines (PPR 8/7), which was established by the Sub-Committee at its seventh session.

2 The Correspondence Group recommended establishing a working group at PPR 8 with the draft terms of reference set out in paragraph 56 of document PPR 8/7 (Norway), which include the review of the scope of application of the draft amendments to MARPOL Annex IV to new and existing ships.

Impact on existing ships

3 The co-sponsors agree that sewage treatment plants (STPs) not working properly should be addressed to improve bad effluent quality. On the other hand, the practicability and the impact on stakeholders in particular when applying new regulations to existing ships should also be taken into account.

4 The Correspondence Group proposes the new and tightened standards for effluent from STPs including completely new parameters (i.e. turbidity and total residual oxidizers). Existing STPs have not been originally intended and designed to meet such new parameters. Therefore, the existing STPs might not meet the new effluent standards and could be required to be replaced on existing ships.

5 If whole replacement is eventually required for existing STPs which have been approved, installed and operated on board, such replacement would bring a significant impact including time and cost burden to shipowners.

Causes of bad effluent quality from STPs

6 In the first instance, as indicated in documents MEPC 74/14 (Norway) and MEPC 71/INF.22 (Netherlands), it is suspected that the potential causes of bad effluent quality is a lack of proper maintenance and operation of STPs. For example, removal of sewage sludge, internal cleaning and chlorine delivery may not be regularly performed, and the condition of bacteria which decompose organic matter in sewage might not be properly maintained in STPs. In order to provide solutions to these causes, the first point to be discussed should be how to improve the current maintenance and operation of existing STPs based on the sufficient knowledge on work mechanism of STPs and how to improve the current effluent quality.

7 More specifically, according to document MEPC 71/INF.22, coliform bacteria of more than 10 thousand times larger than the effluent standards were detected in the effluent from many STPs. Some samples indicated coliform bacteria of the order of 10 million times to billion times larger than the effluent standards.

8 The Correspondence Group has not identified concrete measures to be carried out on board to resolve bad effluent quality. Therefore, there is a need to identify what measures are effective against bad effluent quality, based on the evidence. Otherwise, the new standards cannot become achievable even by new ships with new STPs in future.

Proposals

9 The co-sponsors propose extending the target completion year of output 1.26 to 2022 and re-establishing the Correspondence Group for further discussion on concrete measures to improve the effluent quality from STPs installed on existing ships, to be considered at the ninth session of the Sub-Committee.

10 The co-sponsors also propose that the Correspondence Group address the following items:

- .1 identify the operational issues that make the ability of sewage treatment plants worse and the operational measures for addressing the issues with concrete evidence (e.g. development of guidelines for proper maintenance and operation of sewage treatment plants installed on existing ships);

- .2 identify the legal framework to monitor the level of improvement of effluent quality from sewage treatment plants installed on existing ships (e.g. sewage management plan for ensuring proper operation in compliance with the guideline, regular effluent sampling for monitoring the level of improvement of effluent quality, sewage record book to record the effluent quality and survey for monitoring the effort by each ship); and
- .3 consider regulations for existing ships in MARPOL Annex IV, following the result of items 1 and 2.

11 In addition, it is proposed that the items indicated in paragraph 10 of this document and those items indicated in paragraph 56 of document PPR 8/7 that will not have been completed at PPR 8 be included in the terms of reference of the Correspondence Group.

Action requested of the Sub-Committee

12 The Sub-Committee is invited to consider the proposals in paragraphs 9 to 11 and take action, as appropriate.
