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REVIEW OF THE 2011 GUIDELINES FOR THE CONTROL AND MANAGEMENT OF SHIPS' BIOFOULING TO MINIMIZE THE TRANSFER OF INVASIVE AQUATIC SPECIES (RESOLUTION MEPC.207(62))

Comments on the report of the Correspondence Group on Review of the Biofouling Guidelines

Submitted by Bahamas, India, Japan, Panama, ICS and BIMCO

SUMMARY

Executive summary:	This document provides comments on document PPR 9/7 (Norway) – Report of the Correspondence Group on Review of the Biofouling Guidelines. The co-sponsors propose that the concerns on cost burden due to frequent cleaning in dry dock and the practicability of cleaning be taken into account at the Correspondence Group that will be re-established by PPR 9.
Strategic direction, if applicable:	1
Output:	1.19
Action to be taken:	Paragraph 21
Related documents:	PPR 9/7 and PPR 9/INF.4

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 document PPR 9/7 (Norway).

2 The Correspondence Group on Review of the Biofouling Guidelines was established by PPR 8, and it developed a draft revised guidelines for the control and management of ships' biofouling to minimize the transfer of invasive aquatic species (hereinafter referred to as "draft revised guidelines") as annexed to the report of the Correspondence Group (PPR 9/7).

3 The draft revised guidelines recommend actions, including cleaning in water and in dry dock, for ships exceeding a certain level of biofouling on their hull and niche areas. In a specific case, a ship's hull and niche areas need to be cleaned in dry dock.

4 This document expresses concerns on such recommended actions that direct ships to a cleaning in dry dock and could pose burden on ships, and therefore proposes that the recommended actions be further discussed at the Correspondence Group which will be re-established by PPR 9. It should also be recalled that, at PPR 8, many delegations expressed the view that macrofouling cleaning should not only be carried out in dry dock, since the effective removal and capture of the macrofouling during in-water cleaning could be ensured if best practices were followed.

When cleaning in dry dock is recommended

5 According to the draft revised guidelines, ships with a surface covered by invasive species of 1% or more by area ratio need to be cleaned in dry dock. In short, cleaning in dry dock would be decided based on the following steps:*

Step 1 Target areas are designated from within hull and niche areas by shipowners.

Step 2 Each biofouling ratio of the target areas is visually checked by conducting in-water inspection. The biofouling ratio of the worst fouling area of one square metre is deemed as that of the entire target area.

Step 3 If covered by invasive species of 1% or more by area ratio, the target area is assigned as "fouling rating 6", and cleaning in dry dock is recommended.

6 According to these steps, the entire ship itself will need to dry-dock for cleaning if there is just a single area of one square meter that is covered by invasive species of 100 cm^2. The co-sponsors have concerns on such procedure that would bring burden to shipowners.

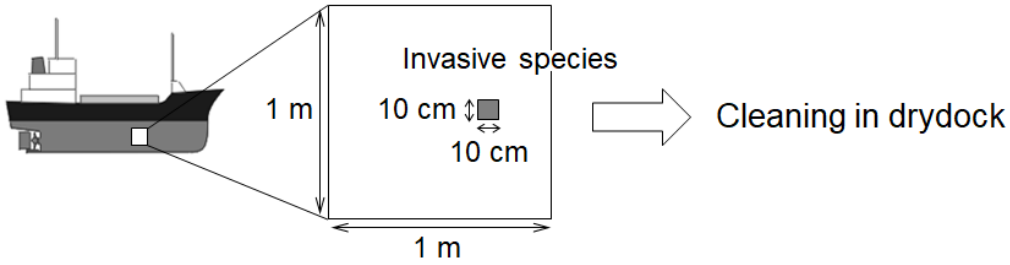

Figure 1: When cleaning in dry dock is recommended

Concerns on cleaning in dry dock

Frequent dry-docking

7 According to the draft revised guidelines, highly frequent cleaning in dry dock could be imposed on shipowners. As an extreme logic, even dry-docking every voyage may be needed.

8 For example, there may be a ship engaged in a sea area with high risk of fouling of invasive species. Even though the ship cleans its fouling in dry dock before the voyage, the ship could be fouled by invasive species after the voyage and may become the condition that cleaning in dry dock is recommended again. Such a mechanical recommendation for dry-docking would not be economically feasible.

* These steps are a simplified summary of the procedure. The details of the procedure for defining target area, biofouling inspection and judging recommended actions are shown in section 8 and appendix 5 of the draft revised guidelines.

Out-of-service period

9 Cleaning in dry dock makes ships out-of-service for a long time, including the preparation period before and after docking. For docking, cargoes need to be unloaded and the original service route needs to be changed for sailing into a dock. After docking, the ship needs to sail to return to the service route.

10 It would take around a month from the time the ship stops its service to the time it restarts its service, including the period for applying anti-fouling coating after cleaning. In addition, the period for waiting for docking may be added in case there is no available dock.

11 An increase of frequent docking may cause an increase of out-of-service ships and bring adverse effects on the sound seaborne trade.

Cost burden

12 Out-of-service ships directly cause a loss on shipowners as charter fees are not paid. Moreover, the unexpected change of the original voyage schedule for docking delays cargo transportations and results in further losses. Also, there are costs for docking and additional fuel costs due to the deviation from the service route.

13 The co-sponsors have a concern on such a cost burden on shipowners due to the frequent dry-docking leading to out-of-service ships.

Difficulty in distinguishing between invasive species and other species

14 It would also be impractical to exactly distinguish between invasive species and other species by in-water visual inspection or photos of surfaces. Organisms on the ship's surface are motley, mixed and ill-defined.

15 Therefore, the co-sponsors hope that the recommendation for cleaning in dry dock should take into account the practicability of its implementation.

Niche areas unfitted for in-water cleaning

16 There are several niche areas which are unfit for in-water cleaning. For example, niche areas with narrow size and/or complicated shape such as bow thruster, rope guard, stern tube seal, sea chest and propeller would be difficult to be cleaned by remotely operated vehicles (ROVs). Moreover, very narrow parts such as bow thruster, inside of rope guard and stern tube seal would be difficult to be accessed not only by ROVs but even by divers.

17 For such niche areas, according to the draft revised guidelines, only cleaning in dry dock would be applicable in theory, even if their fouling rating is low (e.g. fouling rating 2: heavy microfouling, or fouling rating 3: light macrofouling). In addition, frequent dry-docking for such niche areas would cause an increase of out-of-service ships and cost burden on shipowners as mentioned above.

18 Also, even if a suitable combination of marine growth prevention systems (MGPS) has been applied to each niche area to prevent biofouling, it may not be realistic to keep them with completely no biofouling for years. The effectiveness of MGPS is different for each niche area and the risks from the sea area are different for each ship.

19 Therefore, the co-sponsors hope that the recommended actions for cleaning of the above-mentioned niche areas should be practicable, taking into account the feasibility in performing in-water cleaning and the effectiveness of MGPS. This could be further discussed in conjunction with the recommendation for cleaning in dry dock.

Proposal

20 Given the discussion above, it is proposed that the following points be taken into account in the further discussions on paragraph 48.3 of document PPR 9/7 in the Correspondence Group that will be re-established by PPR 9:

.1 frequent cleaning in dry dock could cause out-of-service ships and cost burden on shipowners, and should be avoided;

.2 practicable recommendation for cleaning in dry dock should be considered given the difficulty in distinguishing between invasive species and other species; and

.3 recommended actions for cleaning of niche areas should be practicable, taking into account the feasibility in performing in-water cleaning and the effectiveness of MGPS.

Action requested of the Sub-Committee

21 The Sub-Committee is invited to consider the proposal in paragraph 20 and take action, as appropriate.