

MARINE ENVIRONMENT PROTECTION
COMMITTEE
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Agenda item 4

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HARMFUL AQUATIC ORGANISMS IN BALLAST WATER

Comments about the type of sampling and analysis of ballast water discharges during surveys

Submitted by ICS

SUMMARY

Executive summary: This document aims to provide additional points to consider when determining the type of analysis of ballast water discharges during surveys.

*Strategic direction,
if applicable:* 1

Output: 1.24

Action to be taken: Paragraph 6

Related documents: MEPC 81/4/9, MEPC 81/WP.9; MEPC 82/4/5 and BWM.2/Circ.42/Rev.2

Introduction

1 This document is submitted in accordance with paragraph 6.12.5 of the *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.5), comments on document MEPC 82/4/5 (Australia) and aims to provide additional points to consider when determining the type of analysis of ballast water discharges during surveys.

Background

2 At the eighty-first session of the Committee, the frequency of additional sampling and analysis requirements of ballast water discharges during flag State surveys was agreed to twice every five years, i.e. during intermediate and renewal surveys. With regard to the type of analysis that should be undertaken during the flag State surveys, it was agreed that both indicative and detailed analysis could be allowed, but this was not concluded during MEPC 81 and would be further considered as part of the work of the Correspondence Group on Review of the BWM Convention (MEPC 81/WP.9, paragraph 12).

Discussion

3 The commissioning test is important but not sufficient to guarantee the lifetime performance of a ballast water management system (BWMS). ICS would like to highlight that challenging water quality conditions can make it difficult for BWMS to meet the D-2 standard. The introduction of additional sampling and analysis requirements during the flag State surveys, the frequency of which was determined by MEPC 81 (MEPC 81/WP.9, paragraph 12), may help to determine if non-compliance is as a result of inadequate training or maintenance, or if it is a result of the BWMS inability to handle challenging water quality conditions.

4 As for the type of analysis that should be conducted during the surveys, ICS is open to detailed analysis of the sample during the surveys but has the following concerns:

- .1 In addition to the difficulties mentioned in conducting detailed analyses during surveys, as described in paragraphs 10.1 and 10.2 of document MEPC 81/4/9, ICS would further point out that several parts of the world still lack the infrastructure to conduct detailed analyses. This may pose additional challenges to the effective implementation of the surveys particularly for ships on worldwide voyages.
- .2 It should be noted that, in table 1 of BWM.2/Circ.42/Rev.2, indicative and detailed analyses under the D-2 standard are defined and differed and, as indicated by tables 3 and 4 of BWM.2/Circ.42/Rev.2, the level of confidence or detection limit as well as the citation for validation studies for both indicative and detailed analyses remain to be determined. As a result, ICS advises caution when deciding whether to use detailed analysis also as one of the methods during surveys especially when a universal worldwide accepted BWMS discharge testing standard like an ISO standard has not yet been established.
- .3 When commissioning testing is conducted on the basis of indicative analysis, a situation may arise when the sample fails during the survey or inspection on the basis of detailed analysis. It is essential to recognize that indicative analysis may not always provide the same level of accuracy as detailed analysis and, in such cases, where discrepancies arise during surveys or inspections and the sample fails based on detailed analysis, it may not be fair or accurate to penalize ships.

Proposal

5 Taking into account the concerns raised in paragraph 6, the Committee should consider including detailed analysis only as a voluntary measure during surveys and, based on experience gained over time, develop further measures.

Action requested of the Committee

6 The Committee is invited to consider the comments and proposals contained in the document and take action as appropriate.