



# Technical Information

---

No. : 117 - 2018

9 February 2018

To : All BKI Customers

Subject : Summary Report on IMO Meeting of Sub-Committee on Pollution Prevention and Response 5th Session (PPR 5)

## Summary

This Technical Information summarizes the result of 5th Session of the IMO Pollution Prevention and Response (PPR 5) that was held from the 5 to 9 February 2018, at the IMO headquarters in London.

## Information

The information provided in this Technical Information is the ones which have high relevance with the work of BKI. Any information or advice provided in this document shall be no responsibility of BKI and BKI shall not be liable to any person for any loss, damage or expense cause by its reliance.

The following agenda are among those discussed during the meeting:

Agenda Number	Topic
5	Revised Guidance on Ballast Water Sampling and Analysis
9	Guidelines for the Discharge of Exhaust Gas Recirculation Bleed-off Water
10	Revised Certification Requirements for SCR Systems Under the NOx Technical Code
12	Amendments to Regulation 14 of MARPOL Annex VI to Require a Dedicated Sampling Point for Fuel Oil
13	Consistent Implementation of Regulation 14.1.3 of MARPOL ANNEX VI
14	Revised Guidelines for the Application of MARPOL ANNEX I Requirements to FPSOs and FSUs
18	Use of electronic record books
20	Unified Interpretation to Provisions of IMO Environment-related Conventions

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

Inquiries concerning the subject of this Technical Information should be directed to:

BKI Statutory Division  
Yos Sudarso 38-40  
Jakarta, 14320  
Indonesia  
Phone : +62 21 436 1899, 436 1901, 436 1903, 436 1904  
Fax : +62 21 4390 1974  
Email : [sta@bki.co.id](mailto:sta@bki.co.id)

Operation Director

- SIGNED -

**MOHAMAD CHOLIL**

---

Disclaimer

Any information or advice provided in this document shall be no responsibility of BKI and BKI shall not be liable to any person for any loss, damage or expense cause by its reliance.

## **BRIEF INFORMATION ON IMO MEETING OF SUB-COMMITTEE ON POLLUTION PREVENTION AND RESPONSE 5TH SESSION (PPR 5)**

### **A. REVISED GUIDANCE ON BALLAST WATER SAMPLING AND ANALYSIS (AGENDA ITEM 5)**

#### **Ballast water sampling and analysis**

In order to monitor the implementation of the BWM Convention, MEPC 71 agreed to establish an experience-building phase. Therefore, at this session, the Republic of Korea submitted a proposal to revise the Guidance on ballast water sampling and analysis for trial use in accordance with the BWM Convention and Guidelines (G2) (BWM.2/Circ.42/Rev.1).

This proposal is based on lack information in BWM.2/Circ.42/Rev.1 regarding “representative samples” to obtain appropriate sampling and homogenous population to ensure successful analysis.

To further consider this proposal, the Sub-Committee established Working Group on Ballast Water Management and Anti-fouling Systems. After deliberation made on Working Group and plenary, it was agreed that the best course of action would be not to revise BWM.2/Circ.42/Rev.1 at this stage, while the matter may be reconsidered in the future, possibly also taking into account the ISO standard 11711 once completed and available.

#### **Methodologies that may be used for enumerating viable organisms**

The Sub-Committee noted that MEPC 71 approved BWM.2/Circ.61 on *Guidance on methodologies that may be used for enumerating viable organisms for type approval of ballast water management systems*.

The Sub-Committee also noted that there was a proposal submitted at MEPC 71 by the Netherlands to add two additional methods to the list, i.e. FCM and PAM methods. However, the Committee could not proceed the discussion because it was agreed that more information was needed on the details and validations of these methodologies.

At this session, the Netherlands submitted the information paper to be considered by the Sub-Committee. In this information paper, the Netherlands confirmed that the two methods are meant to be used together and not separately, and that no validation of the combination of the two methods has been carried out. In this regard, the Sub-Committee agreed not to add the FCM and PAM methods in BWM.2/Circ.61 at this stage. It was also agreed that any consideration should be for one possible entry in BWM.2/Circ.61 rather than two separate ones, however this could only be done following the submission of information once the aforementioned combined validation has taken place.

For the further submission, the Sub-Committee agreed that specific information should be provided to clarify:

1. how the combined method would apply to the entire 10 to 50 µm size category of organisms, as it appears to apply only to a subset of this category;
2. how the two methods would be used together in order to produce an enumeration of organisms, depending also on whether they would be identified as viable or living; and
3. whether and how the combined method could be affected by the presence of bacteria.

### **System Design Limitations**

The term System Design Limitations (SDL) was introduced in the 2016 Guidelines (G8). Therefore, MEPC 70 agreed to develop separate guidance on the matter for use in conjunction with the 2016 Guidelines (G8).

As basis for development of Guidance on SDL, Canada submitted the draft guidance on SDL and self-monitoring of BWMS to MEPC 71. Due to time constraint, the Committee agreed to refer the draft to PPR 5 for finalization.

The Working Group established at this session completed the finalization of the draft Guidance on System Design Limitations of ballast water management systems and their monitoring. The draft will be submitted to MEPC 73 for approval and dissemination as a BWM.2 circular.

### **Contingency measures**

The Sub-Committee recalled that MEPC 70 had invited submissions with draft text for guidance on contingency measures under the BWM Convention. At this session, the Sub-Committee gave its further consideration on guidance on contingency measures in ports with challenging water quality.

It was also highlighted that contingency measures are meant to deal with occasional instances of discharged ballast water being non-compliant and not with situations that may occur such as the uptake of ballast water at ports with challenging water quality. Therefore, it was agreed that the aspect of contingency measures, focusing on discharge, should be separated from that of ports with challenging water quality, focusing on uptake.

Upon its deliberation, the Sub-Committee agreed that the best way to address the issues on contingency measures is to invite submission to the next session of the Sub-Committee. With regard to contingency measures, information should be provided on specific examples of contingency measures acceptable to port States and implemented by the shipping industry, which could then be included in an annex to the Guidance on contingency measures under the BWM Convention (BWM.2/Circ.62). As for ports with challenging water quality, comments and/or proposals for draft guidance should be provided.

## **B. GUIDELINES FOR THE DISCHARGE OF EXHAUST GAS RECIRCULATION BLEED-OFF WATER (Agenda item 9)**

In the previous MEPC 71, the Committee sent back the draft guidelines due to the unsolved issues. The draft guidelines has been discussed during PPR5, and Sub Committee agreed the draft 2018 Guidelines for the discharge of exhaust gas recirculation (EGR) bleed-off water for adoption by MEPC 73. The Guidelines was developed as a companion for MARPOL Annex VI which requires marine diesel engines to meet the Tier III NOX emission levels when operating in a NOX Tier III emission control area. The main purpose of these Guidelines is to specify requirements for the discharge to the sea of bleed-off water when using EGR and to be applied to any EGR system on a marine diesel engine, certified in accordance with MARPOL Annex VI, installed on board a ship.

**C. REVISED CERTIFICATION REQUIREMENTS FOR SCR SYSTEMS UNDER THE NOX TECHNICAL CODE (Agenda item 10)**

There are two certification schemes in the NOx Technical Code namely: Scheme A and Scheme B. The scheme A is conducted by testing the engine and the SCR together, where the Scheme B the engine and the SCR are certified separately before putting onboard and final (simplified) testing is undertaken. In the previous NOx Technical Code, Scheme B can be used only when the scheme cannot be undertaken due to “practical and technical” reasons

The amendment of the NOx Technical Code stated that the pre-certification in accordance with Scheme B as given by the Guidelines developed by “2017 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 (SCR) systems (Resolution MEPC.291(71))”. In addition, the Resolution MEPC 291(71) was consequently amended in order to harmonize with the Code.

These two amendments were sent to the MEPC 73 for approval and with a view to adoption at MEPC 74.

**D. AMENDMENTS TO REGULATION 14 OF MARPOL ANNEX VI TO REQUIRE A DEDICATED SAMPLING POINT FOR FUEL OIL (Agenda item 12)**

During the meeting, The Sub-Committee considered document submitted by Norway which is proposing draft text for new regulations 14.11 and 14.12 of MARPOL Annex VI that would require t each ship of 400 gross tonnage and above shall be fitted with one or more dedicated sampling points for the purpose of taking representative samples of the fuel oil presently used on board the ship; and suggesting to consider the need to review the Guidelines for onboard sampling for the verification of the Sulphur content of the fuel oil used on board ships (MEPC.1/Circ.864). Therefore, the Sub Committee invited member state and international organization to provide further comment and submit to Intersessional Meeting in order to amendment MARPOL Annex VI as well as giving a view whether the guidance in MEPC.1/Circ.864 is sufficient.

**E. CONSISTENT IMPLEMENTATION OF REGULATION 14.1.3 OF MARPOL ANNEX VI (Agenda item 13)**

In this agenda, the Sub Committee agrees to a work plan to complete the output on "Consistent implementation of regulation 14.1.3 of MARPOL Annex VI". The work plans consist of:

Work Plan	Drafting	Finalization	Approval	Adoption	Expected EIF
Draft Guidelines for consistent implementation of regulation	Intersessional meeting	PPR 6	MEPC 74	-	-
Draft amendments to MARPOL Annex VI, regarding the definition of Sulphur content and testing verification procedures	Intersessional meeting	PPR 6	MEPC 74	MEPC 75	Summer 2021
2009 Guidelines for port State control under the revised MARPOL Annex VI (resolution	Intersessional meeting	PPR 6	-	MEPC 74	-

MEPC.181(59))					
2010 Guidelines for monitoring the worldwide average Sulphur content of fuel oils supplied for use on board ships (resolution MEPC.192(61), as amended by resolution MEPC.273(69))	Intersessional meeting	PPR 6	-	MEPC 74	-
Guidelines for onboard sampling for the verification of the Sulphur content of the fuel oil used on board ships (MEPC.1/Circ.864)	Intersessional meeting	PPR 6	-	MEPC 74	-

Regarding to the a prohibition on the carriage of non-compliant fuel oil for combustion purpose with a Sulphur content exceeding 0.50%, the Sub Committee agree to the draft amendments to “MARPOL Annex VI” and “Form of International Air Pollution Prevention (IAPP) Certificate” to be submitted to MEPC 72 for approval as an urgent matter, with a view to adoption at MEPC 73.

**F. REVISED GUIDELINES FOR THE APPLICATION OF MARPOL ANNEX I REQUIREMENTS TO FPSOs AND FSUs (Agenda item 14)**

The Sub-Committee recalled that MEPC 70 had agreed to include a new output on Revised Guidelines for the application of MARPOL Annex I requirements to FPSOs and FSUs.

The Sub-Committee had for its consideration document submitted by United States, providing the text of the draft revised Guidelines, with a view to clarifying the application of the stability instrument requirements in regulation 28.6 of MAROL Annex I and to updating the Guidelines to address the application of all other MARPOL Annex I amendments since MEPC 54 (2005).

It is noted that the environmental hazards associated with the quantities of produced oil stored on board operational FPSOs and FSUs are similar to some of the hazards related to oil tankers, and that relevant requirements of MARPOL Annex I in relation to oil tankers could be adapted to address those hazards in an appropriate manner. Based on the above and recognizing that these floating platforms are stationary when operating, the coastal States, flag States and others associated with the design, construction and operation of FPSOs and FSUs are recommended to apply the relevant MARPOL Annex I regulations.

Therefore, the purpose of these Guidelines is intended to provide for uniform application of MARPOL Annex I requirements to FPSOs and FSUs that are used for the offshore production and storage or for the offshore storage of produced oil.

Following its consideration, The Sub-Committee established the Drafting Group on revised Guidelines for the application of MARPOL Annex I requirements to FPSOs and FSUs and instructed it to finalize the text of the draft 2018 Guidelines for the application of MARPOL Annex I requirements to FPSOs and FSUs.

The Drafting Group prepared the draft MEPC resolution on 2018 Guidelines for the application of MARPOL Annex I requirements to floating production, storage and offloading facilities (FPSOs) and floating storage units (FSUs), for submission to MEPC 73, for consideration, with a view to adoption.

#### **G. USE OF ELECTRONIC RECORD BOOKS (Agenda item 18)**

The Sub-Committee recalled that PPR 4 had requested the Secretariat to prepare an updated draft package for the use of electronic record books, including draft Guidelines for the use of electronic record books under MARPOL; draft amendments to MARPOL and the NOX Technical Code; draft unified interpretations of MARPOL and the NOX Technical Code; draft amendments to the Procedures for port State control; and draft amendments to 2009 Guidelines for port State control under the revised MARPOL Annex VI, for its consideration at this session.

Taking into account the above matters, the Sub-Committee established Drafting Group on Revised Guidelines for the Application of MARPOL Annex I requirements to FPSOs and FSUs and Use of electronic record books to finalize:

1. Draft Guidelines for the use of electronic record books under MARPOL.
2. Draft amendments to MARPOL and the NOX Technical Code.
3. Draft amendments to the Procedures for port State control, 2011 (resolution A.1052(27)); and
4. Draft amendments to the 2009 Guidelines for port State control under the revised MARPOL Annex VI (resolution MEPC.181 (59)).

Those drafts will be submitted to MEPC 73 for approval.

#### **H. UNIFIED INTERPRETATION TO PROVISIONS OF IMO ENVIRONMENT-RELATED CONVENTIONS (Agenda item 20)**

It is note the Group's discussion on engine test cycles required by the NOX Technical Code 2008 and, that due to a lack of sufficient support by Member Governments, the Group agreed not to develop a relevant unified interpretation.