



Technical Information

No. : 053 - 2016

11 March 2016

To : Whom it may Concern

Subject : Summary Report on IMO Meetings Of Sub-Committee on Pollution Prevention and Response 3rd Session (PPR 3)

Summary

This Technical Information summarizes the 3rd Session of the IMO Sub-Committee on Pollution Prevention and Response (PPR) was held from the 15 to 19 February 2016, at the IMO headquarters in London.

Information

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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.	Production of a manual entitled "Ballast Water Management – How to do it"
8.	Consideration of the impact on the Arctic of emissions of Black Carbon from international shipping
9.	Development of standards for shipboard gasification waste to energy systems and associated amendments to regulation 16 of MARPOL Annex VI
10.	Amendments to bunker delivery note to permit the supply of fuel oil not in compliance with regulation 14 of MARPOL Annex VI
11.	Guidelines for onboard sampling and verification of the Sulphur content of the fuel oil used on board ships
12.	Guidelines for the discharge of exhaust gas recirculation bleed-off water
13.	Improved and new technologies approved for ballast water management systems and reduction of atmospheric pollution
14.	Revised section II of the Manual on oil pollution contingency planning

15.	Guide on oil spill response in ice and snow conditions
16.	Updated IMO Dispersant Guidelines (Part IV)
17.	Updated OPRC Model training courses
18.	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

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Brief Information on IMO Pollution Prevention and Response (PPR 3)

Safety and pollution hazards of chemicals and preparation of consequential amendments to the IBC Code (Agenda item 3)

- **Evaluation on Cleaning additives**

Since no new products is submitted at PPR 3, the review discussed at the meeting is focused on cleaning additives. It was noted that 18 cleaning additives has been considered and meets the criteria of regulation 13.5.2

- **Review of MEPC.2/Circular List 1, List 2 and List 3 – provisional classification of liquid substances transported in bulk and other related matters**

There are 30 products which will expires for its tripartite agreements by December 2016, this is to be concerned for its follow up action.

- **Draft MSC-MEPC Circular on Example of a certificate of protection for products requiring oxygen-dependent inhibitors by paragraph 15.13.3 of IBC Code**

PPR 3 agrees to put forward this circular and sent to MSC 96 and MEPC 70 for approval.

- **Revision of the IBC CODE – chapters 17, 18 and 21**

ESPH 21 has considered the draft on the revised chapter 21 which was intended to harmonize carriage requirement criteria from UN Globally Harmonized System of Classification and Labelling of Chemicals (GHS) and the 2014 edition of the revised *GESAMP hazard evaluation procedure for chemical substances* carried onboard ships.

Any deviation conducted based on chapter 21 to be noted for the reason being as a consideration for future works. Reference to maximum temperature will be discussed much further in deciding the acceptable value. Some main issues on toxic material due to the application on revised draft chapter 21 are:

1. Vapour detection issues: is additional equipment required? What is necessary for toxic component detection? With relevance to products with low volatility, is there any available instrument to detect toxic vapour concentration?
2. Classification of toxic products: id the level too low? Or additional criteria needs to be reviewed according to chapter 21?
3. Is there an INC Code requirements triggered and is still valid?
4. Where and when those products needs to be identified?

In order to gather additional information, it is agreed to invite the industries to provide information related to the components which might trigger toxic level for the products and be discussed at ESPH 22.

- **Revision of the guidelines for the provisional assessment of Liquid substances transported in bulk (MEPC.1/Circ.512)**

Revised Draft Guidelines will be circulated intersessionally and agreed to be considered in detail during ESPH 22.

- **Development of minimum carriage requirements for Contaminated bulk liquids carried on OSVs**

Since there was no documents submitted for this agenda, it was agreed to invite further the industries to provide technical information related the composition on contaminated backloads at ESPH 22.

It was agreed that if no technical data being provided until ESPH 22, then general carriage requirements for backloads will be provided, according to its known flammability and toxicity concerns, using precautionary approach.

- **Guidance/procedures for the assessing of products classified under Annex I or under Annex II of MARPOL**

MARPOL defines that cargo that can be carried with relevance to Annex I is of oil type according to the list of Appendix I, and the carriage of Annex II is intended for cargo according to Chapter 17, 18, 19 of IBC Code and other related Circular. At present, there are fuel (petroleum products) known as bio fuels, which would render the definition of carriage according to Annex I and Annex II becomes unclear, due to the nature of its chemicals. There are two main things to be discussed further:

1. Procedure for the assessment itself: for example : type needed and how the products is defined (e.g.: IBC Code, MEPC.2/Circular, etc.); and also
2. Specifically deciding the second generation bio-fuels, introduced by MEPC documents which is similar to MARPOL Annex I products composition.

Furthermore, the industry is invited to provide submission to ESPH 22.

Review of MARPOL Annex II requirements that have an impact on Cargo residues and tank washings of high viscosity and Persistent floating products (Agenda item 4)

ESPH 19 has concluded the necessity to take action on high viscosity and persistent floating products.

Considering the comments made during plenary session and the document proposal of one of the agenda, it has identified several matters:

1. Pre-wash requirements.
2. Designation of special area.
3. Consideration on exemption according to regulation 4.1.3 of MARPOL Annex II, be it still needed or justified.
4. Consideration on the availability of reception facilities.
5. Consideration on the number of products and volume which will be affected by the requirements.
6. The need to conduct an assessment of the implication, implementation of amendments to MAPOL Annex II for straightening this issues.

After ongoing discussion on several option which can be taken, it was decided that best action forward are:

1. Making amendments on the definition on high viscosity and solidifying substances on MARPOL Annex II; and
2. Follow pre-wash procedure according to MARPOL Annex II, appendix VI part B.

There will be 160 – 180 products which will be affected by the amendments requiring pre-wash, therefore designated special area is also to be taken into consideration, which shall affect globally not localized.

The availability of reception facilities for the whole variety of products needs further review. The study on the said matters will be discussed at ESPH 22.

Code for transport and handling of limited amounts of hazardous and noxious liquid substances in bulk on offshore support vessels (Agenda item 5)

PPR has been assigned to update Resolution A.673 (16) to consider the carriage a large number of dangerous substance on offshore support vessel. Since several items needs more clarification, PPR 3 forwarded the works to ESPH 22 with regards to the clarification on the definition “oil-based mud containing mixtures of products”.

Limiting value has been deleted, which benefited the calculation for damage stability criteria according to A.673(16) (as amended by resolution MSC.335 (90)) and also the IBC code requirements (Ship Type 1). Issues related to the stability instrument requirements on this agenda awaits the result by correspondence group on SDC Sub Committee.

Ballast Water Management issues (Agenda item 7)

Several items to be followed up on the discussion of this agenda which happens at PPR 3 to the drafting groups are:

1. To revise the manual content with regards to ISM Code, in order to remove ambiguity in the context of ballast water management plan approval.
2. The needs to revised retention period of B/W record book onboard ships
3. Stakeholder responsibility and its legal implications
4. Delegation of RO to be reference to other IMO Instruments only
5. Contingency Planning , as discussed at MEC 68 to be further developed
6. Special attention for the non-compliance aspects and follow up action, including the seafarers criminalization
7. The final text to always be consistent with the BWM Convention
8. Other reference to IMO instrument to be highlighted

Hence, the document will be submitted to PPR 4

Development of standards for shipboard gasification waste to energy systems and associated amendments to regulation 16 of MARPOL Annex VI (Agenda item 9)

Several views and discussion on the above agenda are as follows:

1. Technology which is considered by the amendment to regulation 16 and other related standard to be referenced as gasification processes.
2. Further consideration is needed on the terminology “gasification” is related to the title of regulation 16 on “Shipboard Incineration” and the use of it at regulation and also the terms incineration and incinerator.
3. *General exclusion* on requirements of regulation 16.2 is expected to apply generally with the system which is going to be approved on the proposed standards.
4. Detailed review of the proposed standards will be added with the system description and layout diagram.
5. Considering the proposed standards made according to the 2014 Standard Specification for Shipboard Incinerators (MEPC.244(66)) and wash water bleed-off on wash water elements from 2015 Guidelines for exhaust gas cleaning systems (MEPC.259(68)), then

the proposed standards is to consider the available instruments.

6. Further assessment is needed to assure the proposed standard is as strictly as the MARPOL Annex VI regulation

Correspondence group to draft the standard and amendment to regulation 16 of Annex VI is formed and to report to PPR 4.

Amendments to bunker delivery note to permit the supply of fuel oil not in compliance with regulation 14 of MARPOL Annex VI (Agenda item 10)

PPR 3 agrees to additional options box for the additional information on the bunker delivery notes to ease then data inputs and accommodate ships which uses fuel with Sulphur content higher than regulation 14 hence equipped with the specific control instruments, e.g.: scrubber. Subsequently, there is a need for exemptions for ships conducting trial on SOx emission reduction and emission control research technology.

Guidelines for onboard sampling and verification of the Sulphur content used on board ships (Agenda item 11)

Several notes taken from the agenda are:

1. PPR 3 concurred the Guidelines to be forwarded to MEPC 70.
2. Revision of guidelines title into "Guidelines for onboard sampling for the verification of the Sulphur content of the fuel oil used on board ships." This is due to the previous title requires much specific title and not in accordance with the content of the guidelines.
3. Document foreword to include the entry into force date of the guidelines, instruction that the guidelines applies for port and flag state inspections, and also that it is expected that inspection is conducted under clear grounds for inspections.
4. With regards to the sampling location, to consider the location which has the lesser risk of explosion and flammability, and that the decision to take direct sample on the service tank is not agreed at PPR 3.

Guidelines for the discharge of exhaust gas recirculation bleed-off water (Agenda item 12)

EGR can be used not only as NOx Tier III compliant strategy but also as Tier II compliant strategy. It is then considered to add Tier II compliance option to the draft guidelines. It is agreed that EGR bleed-off water has to be considered according to the usage of fuel in relation with the Sulphur limit on regulation 14.4 of MARPOL Annex VI.

On the discussion, several views were expressed:

1. To assign correspondence group to further discuss the air pollution issue of EGR.
2. Consideration needed for oily water discharge limit 15 ppm and that bleed-off water might be regulated according to Annex I and Annex II of MARPOL.
3. Fuel Sulphur content to be considered much further due to certain effect on the wash water content.
4. Using ECA compliant fuel oil from pH is not considered to become a problem.
5. Consideration is given for ships which have the same discharge line with ECGS and EGR bleed-off water;
6. Reception facilities (under Annex I and Annex II) for EGR bleed-off water might be subject

to the bleed-off water content.

7. Relevant documentation of MARPOL Annex VI to be considered; and
8. Consideration needed to ensure that the EGR bleed-off water can be accepted as an equivalent method as MARPOL Annex VI regulation.

Unified interpretation to provisions of IMO environment-related Conventions (Agenda item 18)

As instructed by the Sub-committee, 20 UIs proposed by IACS has been considered. Several UI proposal was identified not be taken forward. The Working Group at IMO has prepared table 1 which categorized UI elements that can be developed as new work output.

PPR 3/18	UI supported for further consideration as part of WP item	UI not supported for further consideration as part of WP item
Annex 1 (MPC 107)		x
Annex 2 (MPC 108)	x	
Annex 3 (MPC 109)	x	
Annex 4 (MPC 110)	x	
Annex 5 (MPC 111)	x	
Annex 6 (MPC 112)	x	
Annex 7 (MPC 113)	x	
Annex 8 (MPC 114)	x	
Annex 9 (MPC 115)	x	
Annex 10 (MPC 116)	x	
Annex 11 (MPC 117)	x	
Annex 12 (MPC 118)	x	
Annex 13 (MPC 119)		x
Annex 14 (MPC 120)	x	
Annex 15 (MPC 121)		x
Annex 16 (MPC 122)	x	
Annex 17 (MPC 123)	x	
Annex 18 (MPC 124)		x
Annex 19 (MPC 125)	NTC 2008	
Annex 20 (MPC 126)	NTC 2008	

Table 1 Categorization of the UI elements that could be developed as part of a new work programme item

It was noted that there are there are two proposed UI (Annexes 19 and 20 from document PPR 3 / 18) of the NOx Technical Code 2008 with regards to the SCR system approval and several consideration, which was agreed to bring to MEPC 70 for approval.

It is noted to not further consider UI proposal on MPC 107, MPC 119, MPC 121 and MPC 124 document PPR 3 / 18 due to:

1. MPC 107 and MPC 121 can become an additional burden and therefore could limit the use of certification according to scheme B.
2. MPC 119 which allows the non-existence of bypass valve in the testing scheme might affect the urea distribution on the exhaust gas flow and the SCR system performance in demonstrating the compliance on the test bed; and
3. MPC 124 might cause an interpretation of an interpretation which affected the non-consensus of a 5 % allowance.