The environment rules

A roundup of decisions taken at the 47th Session of IMO's Marine Environment Protection Committee (MEPC 47) which took place in London on March 4-8, 2002

CAS - Model Survey Plan

To facilitate completion of the Condition Assessment Scheme (CAS) for certain tankers, MEPC 47 approved a Model Survey Plan for tankers which includes the following two elements:

1. A Guidance Note for the Safe Conduct of CAS surveys, including protection of individuals involved.
2. A CAS Schedule giving a flow chart diagram and timescales for CAS.

CAS was agreed in April 2001 as part of the adoption of a revised Regulation 13G of the MARPOL Convention Annex I. The revised regulation is expected to enter into force in September 2002.

MEPC 47 also agreed draft amendments to CAS to make mandatory the Model Survey Plan and to adopt Mandatory Requirements for the Safe Conduct of CAS Surveys, based on the guidance referred to above. The amendments are intended to be adopted once the revised Regulation 13G enters into force. CAS will have to be applied to certain Category 1 vessels continuing to trade after 2005 and certain Category 2 vessels after 2010.

Although CAS does not specify structural standards in excess of the provisions of other IMO conventions, codes and recommendations, its requirements stipulate more stringent and transparent verification of the reported structural condition of the ship and that documentary and survey procedures have been properly carried out and completed.

The scheme requires that compliance with the CAS is assessed during the Enhanced Survey Programme of inspections concurrent with intermediate or renewal surveys currently required by IMO Resolution A.744(18), as amended.

The revised Regulation 13G sets a new accelerated phase-out schedule for single-hull oil tankers and identifies three categories of tankers. Category 1 oil tankers are those of 20,000 tons deadweight (dwt) and above carrying crude oil, fuel oil, heavy diesel oil or lubricating oil as cargo, and of 30,000 dwt and above carrying other oils which do not comply with the requirements for protectively located segregated ballast tanks. Category 1 tankers are commonly known as pre-MARPOL tankers.

Category 2 oil tankers are those of 20,000 dwt and above carrying crude oil, fuel oil, heavy diesel oil or lubricating oil as cargo, and of 30,000 dwt and above carrying other oils, which do comply with the protectively located segregated ballast tank requirements, i.e. MARPOL tankers. Category 3 oil tankers are those of 5,000 dwt and above but less than the tonnage specified for Category 1 and 2 tankers.

Ship recycling

IMO's role in ship recycling was first raised at MEPC 44 in March 2000, following which a correspondence group was established to research the issue and provide relevant information. During MEPC 47 it was agreed that IMO has a key role to play in ship recycling, including developing measures covering the preparation of a ship before recycling commences and coordinating the work of the International Labour Organization (ILO) and the Basel Convention on the Control of Transboundary Movements of Hazardous Waste and Their Disposal on recycling matters.

For the time being IMO should develop recommendatory guidelines to be adopted by an Assembly resolution, with the "Industry Code of Practice" used as a basis. This

code was developed by an Industry Working Party on Ship Recycling, a group which included the following participants:

- Baltic and International Maritime Council (BIMCO)
- International Association of Dry Cargo Shipowners (INTERCARGO)
- International Association of Independent Tanker Owners (INTERTANKO)
- International Chamber of Shipping (ICS)
- International Tanker Owners' Pollution Federation (ITOPF)
- International Transport Workers' Federation (ITF)
- Oil Companies' International Marine Forum (OCIMF)

and observers from:

- European Community Shipowners' Associations (ECSA)
- nternational Association of Classification Societies (IACS).

A working group which met during MEPC 47 developed the draft outline of IMO guidelines on ship recycling; views on the role of IMO in ship recycling; a work plan; and a preliminary draft IMO Assembly resolution on ship recycling which would adopt the proposed guidelines on ship recycling and invite MEPC to work further on the issue.
MEPC 47 also agreed (a) to re-establish the correspondence group on ship recycling to further develop the guidelines and (b) to continue the cooperation with ILO and the Basel Convention. The IMO Bulk Liquids and Gases (BLG), Ship Design and Equipment (DE) and Flag State Implementation (FSI) Subcommittees will be requested to provide input to the draft guidelines.
In addition, it has been agreed in principle that the Working Group on Ship Recycling would be re-established at the next two MEPC sessions to further the work.

Greenhouse gas emissions
Although their contribution to atmospheric pollution is relatively small, ships do emit greenhouse gases. Because shipping is global, IMO has been requested to deal with ship-based emissions under the Kyoto Protocol of the UN Framework Convention on Climate Change (UNFCCC).
Following plenary and working group discussions, MEPC 47 agreed to establish a correspondence group to collate information received and prepare an IMO strategy on ship greenhouse gas emissions, including a draft Assembly resolution on the matter. One approach is a ship environmental indexing system for assessing an individual ship's environmental performance in relation to greenhouse gas emissions. According to MEPC 47, the idea has merit as a basis for future work.
Ballast water management (BWM)
MEPC 47 adopted a circular which states that, as a fundamental principle, ballast water management and the processes chosen to achieve it should be considered as a basic component when designing a new ship. Furthermore, ballast tank design in newbuildings should facilitate all aspects of ballast water management and take special account of the increased need for content sampling. The primary aim of the latter measure is to enhance the quality and ease of sampling ballast water and sediments, without the need to enter potentially dangerous spaces or to partially fill ballast tanks.

The circular also calls for a Ballast Water Management Plan to be created for each ship. This plan should give guidance on safe and effective operation of the various ballast water management and treatment options that are considered appropriate for the ship. The installation of equipment to record all ballast water operations and treatment actions, and making copies readily available to appropriate authorities, should also be considered.

Ballast water exchange option

MEPC 47 also agreed that, where ballast water exchange at sea is the chosen BWM method, the overall design, strength and stability of the ship should be sufficient to permit its execution on all ballast voyages and in all except severe weather conditions. The maximum sea state and swell conditions identified by the shipbuilder, if any, in which ballast water exchange can safely be carried out should be recorded in the BWM plan for the guidance of the master.

The design of the ship should include consideration of the consequences of ballast water exchange at sea, including stability, hull girder strength, shear forces, resonance, sloshing, stemming, propeller immersion, limitations brought about by insufficient strength in various parts of the ship when the tanks are sequentially emptied and appropriate strengthening incorporated to allow this operation to be conducted safely.

Ballast water convention

A draft international convention for the control and management of ships' ballast water and sediments, as well as associated guidelines for its implementation, is being developed for consideration and adoption by a diplomatic conference scheduled for 2003. However, until this convention is adopted and enters into force, IMO member governments should apply the "Guidelines for the control and management of ships' ballast water to minimise the transfer of harmful aquatic organisms and pathogens", adopted by IMO Resolution A.868(20) in 1997. The guidelines in the circular outlined above should also be followed.

A MEPC 47 working group further developed the draft text of the proposed convention. In particular, a section on special requirements in certain areas and text for the criteria for establishing a ballast water discharge control area were developed, as were requirements for ships discharging ballast water within such areas. However, all the text is provisional until decisions regarding the choice of one or more ballast water treatment standards have been taken. If these special, so-called "Tier 2" requirements are agreed, they would come on top of the general "Tier 1" requirements applicable to all ships carrying ballast water.

Whatever ballast water treatment techniques are to be utilised onboard ships, they should be safe for the ship and crew; environmentally acceptable; practical; cost-effective; and biologically effective. MEPC 47 agreed that the ballast water exchange standard would be one of the tools within the legal instrument, alongside one or more treatment standards.

Ballast management doubts

The MEPC 47 working group agreed that only a 100 per cent removal or inactivation standard can ensure that unwanted organisms and pathogens are not transferred, but that standards based on a lesser percentage have an unquantifiable benefit. A large proportion of the group believed that a 95 per cent reduction would achieve a worthwhile reduction of risk and would be a practicable and achievable solution in the medium term. Others were concerned that this was not a scientifically supportable conclusion.

MEPC 47 agreed to re-establish the BWM correspondence group to carry out a detailed comparative assessment of each of the proposed standards. This work will take into account the various technologies that might be used to achieve these standards and all other relevant factors and considerations, with particular attention to practicality, biological effectiveness, cost-benefit and the timeframes within which the standards could practically be implemented. The correspondence group will prepare a report with recommendations to enable MEPC to decide on the standards to be included in the convention.

Manual on oil pollution
The MEPC Oil Pollution Preparedness and Response (OPRC) drafting group finalised the revised draft text of Section IV of the Manual on Oil Pollution and MEPC agreed to consider the text with a view to approval and publication at its next session.

Inadequacy of reception facilities
Despite the evidence from industry organisations that adequate reception facilities are still lacking in many ports, only a comparatively few reports detailing such inadequacies are filed with IMO each year. MEPC 47 agreed to further consider implementation of the reporting mechanism for inadequate reception facilities at MEPC 48 in October 2002. The Committee also strongly encouraged IMO member states, particularly those parties to MARPOL 73/78 as port states, to fulfil their treaty obligations on providing adequate reception facilities.