



SUB-COMMITTEE ON SHIP DESIGN AND
EQUIPMENT
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Agenda item 20

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ANY OTHER BUSINESS

The proposal for additional phase out of pollution prevention equipment not complying with MEPC.107(49)

Submitted by ICS

SUMMARY	
<i>Executive summary:</i>	This document provides comments on issues relating to the proposal for an additional phase out of pollution prevention equipment not complying with the requirements of resolution MEPC.107(49) as referred to in documents DE52/20/3 and DE52/20/5
<i>Strategic Direction:</i>	7.1
<i>High-level Action:</i>	7.1.2
<i>Planned output:</i>	-
<i>Action to be taken:</i>	Paragraph 10
<i>Related documents:</i>	DE 51/28, paragraph 18; DE 52/20/3; DE 52/20/5

Introduction

1. This document provides comment on issues relating to the proposal to phase out existing pollution prevention equipment not complying with the requirements of resolution MEPC.107(49) as referred to in documents DE52/20/3 and DE52/20/5. It is submitted in accordance with the provisions in paragraph 4.10.5 of the Guidelines on the organization and method of work of the MSC and the MEPC and their subsidiary bodies (MSC-MEPC.1/Circ.1).

Comments

2. ICS acknowledges that there already exists the requirement to phase out pollution prevention equipment which does not comply with Resolution MEPC.107(49). This is a requirement for new construction vessels and when replacing existing equipment. However,

ICS does not believe there is sufficient justification for the proposals contained in DE 52/20/5 to phase out existing equipment in general. It should be recognised that the performance of the same equipment can vary from ship to ship and mandatory replacement of equipment that is performing adequately would place an unnecessary burden on industry with no additional actual environmental benefit.

3. From 01 January 2005 new installations of equipment on both existing and new vessels are required to be in compliance with the new test standards. However, it is also to be acknowledged that concerns have been raised as to the effectiveness of some equipment manufactured in compliance with the new test standard, resolution MEPC.107(49). It would be prudent to address such concerns prior to any further discussion of additional phase in of this equipment.

4. A comprehensive technical discussion is presented in DE 52/20/3. Some of the more pertinent issues related to any acceleration of phase in are summarized below.

Many bilge water treatment systems are unable to handle the mixture of contaminants presently found on board ships. Newer and more advanced systems are theoretically capable of handling most contaminants but **“there are still issues with the processing of bilge water”**.

The newer resolution MEPC.107(49) meters are more finely tuned to detect emulsions and iron oxide particles. However, **“most are still limited in their ability to discriminate between oil and oily emulsions and some particles and non-oily emulsions.”**

Both types of OWS are limited in their abilities to separate oil from water laden with contaminants such as soot, biological detritus, chemical detergents and solvents, soaps, and excessive rust from aging equipment. **“A lack of understanding of present day contaminants remains an obstacle in the efficient operation and troubleshooting of bilge water treatment systems”**.

It is evident from the issues above, that the management of bilge water treatment systems is still ‘work in progress’ for which a solution is still being sought. Many problems may be effectively addressed by consideration and appropriate implementation of the guidance provided by the ‘2008 Revised Guidelines for systems handling oily wastes in machinery spaces of ships incorporating guidance notes for an integrated bilge water treatment system (IBTS)’ recently adopted by MEPC 58.

5. The holistic management approach to bilge water treatment systems described in the annexes to DE 52/20/3 provides emphasis that;

the achievement of more effective pollution prevention is a much wider issue than simply upgrading to the new approval standard, and

there are many other, equally important aspects to be considered.

6. It is therefore unreasonable to mandate significant expenditure on new equipment for existing vessels when the benefits are not well defined. Even more so when holistic consideration of the problem reveals that the proposed upgrade may not be the best way of achieving improvements in pollution prevention for a specific vessel.

7. Appropriate management guidance and operational controls requiring evaluation of the performance and operation of existing equipment and effective maintenance procedures would be both effective and appropriate.

8. It is clear, given the complexity of the problem, that a holistic approach, such as that proposed by DE 52/20/3 will be needed to fully address the various elements and provide real improvements in pollution prevention with respect to engine-room bilge water. ICS considers that the framework provided in the IMarEst paper could provide the basis for taking this forward with an MEPC circular on the maintenance, operation and troubleshooting of bilge water treatment systems as a first step.

9. Given the wide range of very relevant considerations ICS strongly believe that it would be unreasonable to mandate an unqualified phase out or upgrade of existing equipment.

Action requested of the Committee

10. The Committee is requested to note the foregoing and take action as appropriate.