

## HARMFUL AQUATIC ORGANISMS IN BALLAST WATER

### Comment on the outcome of BLG 11

Submitted by ICS

#### SUMMARY

<i>Executive summary:</i>	This document comments on the outcome of BLG 11 concerning ballast water management with regard to the approval process recommended for ballast water management systems that may produce chemicals during the treatment process.
<i>Action to be taken:</i>	Paragraph 7
<i>Related documents:</i>	MEPC 56/2/5 and MEPC 56/2/2

#### Introduction

1. This document is submitted in accordance with the provisions of paragraph 4.10.5 of the Guidelines on the Organization and method of work (MSC-MEPC.1/Circ.1), and comments on document MEPC 56/2/5 (Secretariat) that provides the outcome of BLG 11 concerning ballast water management.
2. ICS wishes to draw to attention that the BLG Sub-Committee did not concur with the recommendations to the Committee provided in the report of the GESAMP-BWWG given in MEPC 56/2/2 regarding the consideration of by-products produced in ballast water treatment systems. Paragraph 3.3.6 of MEPC 56/2/2 states “In this context, the Group considered that any system that alters the chemical composition of seawater should be evaluated by the Group prior to MEPC considering the granting of final approval” and paragraph 3.3.5 “The Group recommend MEPC to agree with this approach”.
3. BLG 11 formulated and agreed the subtly different consideration “that any system which makes use of, or generates, Active substances or free radicals during the treatment process to eliminate organisms in order to comply with the Convention should be evaluated by the GESAMP-BWWG”.
4. It was recognised, during the BLG 11 discussions, that systems now not falling under Procedure (G9) could also produce chemicals and by-products that could harm human health and the environment, and affect the safety of the ship and its crew. However this impact would be evaluated under the provisions of the (G8) Guidelines and so such systems would not have to go through procedure (G9). It was also agreed that the evaluation of eco-toxicological effects under the Guideline (G8) may need to be re-evaluated to better identify these concerns.
5. Following the outcome of the BLG Ballast Water Working Group discussions on this matter two States, supported by ICS, expressed the concern reported in MEPC 56/2/5, paragraph 13, that although specific reference was made to Guideline (G8) with respect to possible eco-toxicological effects, Guideline (G8) does not contain any such procedure, and that until such time as the recommended re-evaluation of these Guidelines would apply, such systems should continue to be evaluated under procedure (G9) as recommended by the GESAMP-BWWG.

6. ICS believes it essential that proposed ballast water treatment systems that produce **any** chemicals are appropriately evaluated as to human health and eco-toxicity effect so as to ensure no future harm to the environment or any other consequence that may arise through an approval process that may not fully consider these important issues. ICS urges the Committee to acknowledge the concerns identified in paragraph 5 above, and follow the recommendation of the GESAMP-BWWG that systems that produce chemicals must be assessed under Procedure (G9). This should apply until such time as the additional IMO guidance identified as required by BLG 11 is provided. By adopting this procedure a uniform assessment of the impact of any chemicals that may be produced by a treatment system would be assured

**Action requested by the Committee**

7. The Committee is invited to consider the information provided during its consideration of the BLG 11 report to the Committee.