

MARINE ENVIRONMENT PROTECTION
COMMITTEE
75th session
Agenda item 10

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POLLUTION PREVENTION AND RESPONSE

Comments on urgent matters emanating from the seventh session of the Sub-Committee

Submitted by CLIA

SUMMARY

Executive summary: This document provides comments on paragraph 2.22 of document MEPC 75/10, which requests the Secretariat to explore the possibility of involving GESAMP to provide scientific advice for and during the development of the different elements of the agreed scope of work

Strategic direction, if applicable: 1

Output: 1.23

Action to be taken: Paragraph 7

Related documents: MEPC 75/10; PPR 7/12/6, PPR 7/INF.23 and MEPC 74/18

Introduction

1 This document provides comments on the action requested of the Committee in paragraph 2.22 of document MEPC 75/10 (Secretariat), which requests the Secretariat to explore the possibility of involving GESAMP to provide scientific advice for and during the development of the different elements of the agreed scope of work for output 1.23, and is submitted in accordance with paragraph 10 of Circular Letter No.3985/Rev.1 on Resumption of the seventy-fifth session of the Marine Environment Protection Committee (16 to 20 November 2020).

2 A previous commenting document from CLIA, PPR 7/12/6, noted the very short timeline allowed between the Secretariat's publication of the report of the GESAMP EGCS Task Team (PPR 7/INF.23) and the PPR 7 deadline for commenting documents during a major holiday. This abbreviated timeline inhibited a full, substantive review of the lengthy, technical report of the GESAMP EGCS Task Team and full evaluation of the report's finding and conclusions. This document is the result of our completed evaluation.

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Discussion

3 Although the GESAMP EGCS Task Team recommends the MAMPEC-BW accumulation model as a key tool in evaluating EGCS discharges, one key available study using this tool, authored by CE Delft, was given limited or no consideration in the GESAMP report. The GESAMP EGCS Task Team cited the reason for this as "the report was in draft and it was not clear to the Task Team in what detail it may be used as the information may be subject to changes." CLIA does not agree with this designation. It noted that the submission PPR 6/INF.20 (Germany) was given primary consideration over the other studies, even though this submission was a preliminary document which had not been drafted into a proposed final document. At the time of consideration, the CE Delft study was made available to the GESAMP EGCS Task Team in advance of CLIA's expected submission to IMO of the CE Delft study in document PPR 7/INF.18. The CE Delft study is one of the few studies utilizing the recommended MAMPEC model for accumulation modeling, with emissions factors based upon a data set of over 200 samples. The study evaluates several scenarios including the regulatory standard OECD Port. The CE Delft study is finalized, and it should be a key resource for serious EGCS washwater assessments.

4 The GESAMP EGCS Task Team Report similarly gives only cursory reference to document MEPC 74/INF.27 (CLIA), which contains a compilation and assessment of 281 cruise ship EGCS washwater samples which were obtained consistent with US EPA protocol. DNV-GL independently reviewed the sampling protocol and laboratory results in preparing its assessment and conclusions, which are based on what is still the largest data set that exists today related to EGCS washwater quality.

5 The report of the GESAMP EGCS Task Team gives limited consideration to the Japan MLIT Report (MEPC 74/INF.24), a 2-year study by the Japanese Government that evaluates the likely impact on marine life from EGCS discharges. GESAMP stated "the details of the study were scant" but the submission by Japan is 72 pages providing ample detail and information to support their conclusions that the risks of discharge water from scrubbers to the marine environment and marine aquatic organisms are in the acceptable range or negligible both in the short and long term. Additionally, both document MEPC 74/INF.24 and document MEPC 74/INF.27 were included as studies to be considered by GESAMP in the report of MEPC 74 (MEPC 74/18). CLIA does not believe sufficient consideration of either document was taken into account.

6 While the report gives considerable attention to some documents with preliminary findings and limited data, due consideration of the three scientific studies mentioned above is effectively missing. These studies each provide a unique contribution to the scientific understanding of the EGCS washwater constituents and their relation to marine water quality, impact on marine life, and port accumulation. Serious consideration of these studies is necessary for any evaluation to be credible and valuable in leading the work towards harmonization of rules and guidance as related to EGCS washwater.

Action requested of the Committee

7 The Committee is invited to ensure that further third-party evaluation of this subject fully considers the three studies mentioned in paragraphs 3, 4, and 5 above, as well as any updates or follow-on versions that become available in the time required.