

MARINE ENVIRONMENT PROTECTION
COMMITTEE
75th session
Agenda item 4

MEPC 75/4/13
24 September 2020
Original: ENGLISH
Pre-session public release:

HARMFUL AQUATIC ORGANISMS IN BALLAST WATER

Comments on the report of the fortieth meeting of the GESAMP-BWWG

Submitted by Cyprus

SUMMARY

Executive summary: This document provides comments on the report of the fortieth meeting of the GESAMP-BWWG (MEPC 75/4/12) concerning the recommendation of the GESAMP-BWWG that Final Approval should not be granted to the FlowSafe ballast water management system

Strategic direction, if applicable: 2

Output: 2.2

Action to be taken: Paragraph 17

Related documents: MEPC 75/4/5, MEPC 75/4/6, MEPC 75/4/11, MEPC 75/4/12 and BWM.2/Circ.13/Rev.4

1 This document provides comments on document MEPC 75/4/12 and is submitted in accordance with the provisions of 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). The ballast water management abbreviations used in this document are the same as those used by the GESAMP-BWWG in its reports.

2 Cyprus appreciates the work done by the GESAMP-BWWG at its fortieth meeting as reported in document MEPC 75/4/12.

3 The GESAMP-BWWG (the Group) recommended in its report (GESAMP-BWWG 40/6) that Final Approval not be granted to the FlowSafe ballast water management system, as stated in paragraphs 0.1, 0.2 and 0.11 (and 11.4.1) of the report. Additional clarification of a few points may provide sufficient justification for reconsideration of the Group's conclusion.

4 It was noted that the majority of the Group's concerns were focused on the system's ability to ensure proper control of residual oxidant and protection of the environment through an in-line, reliable TRO measurement methodology. Specifically, see paragraphs 0.5, 0.6, 0.7, 0.10, 2.10, 2.11, 2.12, 2.13 of annex 5 to the Group's report.

5 The FlowSafe ballast water management system, as tested during land-based testing, took into account the recommendations of the Group stated in paragraph 11.4.2 of annex 5 to the report of GESAMP-BWWG 39 (MEPC 75/4/6). This revised methodology added the in-line HF Scientific TRO meter to act as a calibration check and policing check for the Halogen TRO unit.

6 The addition of the HF Scientific TRO meter was noted by the Group, which, in paragraph 2.6 of annex 5 to the report of GESAMP-BWWG 40 (MEPC 75/4/12), notes:

"The Group recalled that it had recommended during its previous evaluation that for the further development of the BWMS, the applicant should ensure that the control scheme could maintain the TRO dose and the MADC effectively in the full-scale BWMS at all times. The Group noted that to address this issue the applicant had added a DPD TRO meter that would be used as a calibration tool for the TRO sensors and also as a policing measure for the amperometric sensor at discharge".

7 The FlowSafe ballast water management system's land-based test data used in the application for this Final Approval used both the in-line Halogen TRO technology (two meters) and the in-line HF Scientific TRO meter. The Halogen TRO meters were used to control the dosage of the Active Substance upon uptake and the neutralization chemical on discharge. The HF Scientific meter was used on uptake to calibrate the Halogen TRO meters and to provide an upper limit control (alarm and shutdown) if the TRO limit was reached. In addition, on discharge the HF Scientific meter was used to monitor the discharge of TRO, and alarm and shutdown if the MADC was exceeded.

8 GESAMP BWWG 39, during the evaluation of the first application for Final Approval (MEPC 75/4/5), had expressed concerns regarding the ability of the Halogen TRO meter to correctly and accurately control the TRO dosage on uptake and the TRO residual (MADC) on discharge. This concern prompted the applicant to add the HF Scientific DPD TRO meter to be used in conjunction with the Halogen meters for the subsequent application for Final Approval (MEPC 75/4/11).

9 It should be noted that the HF Scientific DPD TRO meter was included in the OMSM on the second submission (MEPC 75/4/11) but was not included in the OMSM that was submitted initially (MEPC 75/4/5).

10 The recommendation from the Group to have the maximum allowable dosage of Active Substance to be set at 7.0 mg/L (as Cl₂) can be achieved by the system's existing control methodology.

11 Regarding the Group's comment in paragraph 0.8 of annex 5 to the report of GESAMP-BWWG 40 (MEPC 75/4/12), it should be noted by the Committee that the system as tested utilized a permanent in-line TRO measurement on uptake and discharge. The only time a "portable" meter was used by the approved test facility was during the mandatory 5-day holding time where in-tank samples were tested on days 1, 2 and 5. No portable meter was used to generate data on discharge, no portable meter is used as part of the FlowSafe ballast water management system and there is no reference to a portable meter in the OMSM.

12 From the evidence presented to the Group during the review, the single data point of 0.54 mg/L TRO residual coincides with the shutting down of the ballast pump, shutting down of the neutralizer pump and the conclusion of the test run. Cyprus asks the Committee to take this information into consideration as the rest of the data points during the test while the system was running were below MADC and reflect proper control.

13 Therefore, Cyprus believes that sufficient safeguards have been used during land-based testing by utilizing both the Halogen TRO technology and the HF Scientific TRO technology.

14 In light of the above clarifications in relation to annex 5 to the report of GESAMP-BWWG 40, Cyprus requests the Committee to agree that Final Approval be granted to the FlowSafe ballast water management system submitted by Cyprus in document MEPC 75/4/11.

15 Paragraph 6.7 of the annex to resolution MEPC.300(72) (Code for Approval of Ballast Water Management Systems (BWMS Code)) reads:

"A Type Approval Certificate shall only be issued to a BWMS that has been determined by the Administration to make use of an Active Substance after it has been approved by the Organization in accordance with regulation D-3.2. In addition, the Administration shall ensure that any recommendations that accompanied the Organization's approval have been taken into account before issuing the Type Approval Certificate."

16 Cyprus, along with the recognized organization involved in the procedure for issuing a Type Approval Certificate, ensures that recommendations set in section 11 of annex 5 to the report of GESAMP-BWWG 40 (MEPC 75/4/12) are taken into consideration and acted upon.

Action requested of the Committee

17 The Committee is invited to consider this document and take action as appropriate.
