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‘A proactive approach to compliance is key’

The extension of the deadline for retrofitting ballast water treatment systems may have given shipowners a breathing space, but failing to follow the principles of the BWM Convention could have a negative impact on operations and profitability, according to Dr Brian Phillips, MD of the UK’s Chelsea Technologies Group

► *CTG managing director Dr Brian Phillips*

It was more than a year ago that the shipping industry was finally provided with a solid timeline around the Ballast Water Management (BWM) Convention and the required installation of a ballast water treatment (BWT) system. The recent decision by the IMO to extend the deadline for the retrofitting of vessels with BWT systems will have come as a relief to many ship owners, but those looking to take advantage of this extension are operating under a real risk of reputational harm and reduced commercial opportunities.

In the offshore and support vessel community, given the nature of these vessel and platform operations, many may be less concerned about the immediate impact of the BWM Convention on their operations. But, as the convention applies to almost all vessel types – including submersibles, and floating craft and platforms – taking a proactive approach to compliance is key. Even if the BWM Convention does not require modifications to a particular vessel or its operations, it can have implications for international trade and ship movements, and it is important to recognise that failing to follow the principles of the convention can have a real impact on operations and profitability.

The revised BWM Convention introduces two standards for handling discharged ballast water. D-1 addresses the ballast water exchange standard and D-2 details the ballast water performance standard using an approved BWT system.

D-1 standard requires ships to ensure that ballast water by volume is exchanged far away from the coast where it will be released. This is due to the fact that coastal organisms will not survive in deep oceans or open seas due to different temperatures and salinity. This can be achieved by several means. The sequential method involves emptying the ballast tank and refilling with replacement ballast water equating to at least 95 per cent volumetric exchange. The flow-through method involves pumping replacement ballast water into a ballast tank and the existing ballast escaping by overflow; at least three times the tank volume is to be pumped. The dilution method allows new ballast water to be filled from the top with simultaneous discharge from the bottom.

▼ *Accurate sampling: CTG’s FastBallast Compliance Monitoring System*

The D-2 standard requires ballast water management to restrict the amount and size of viable organisms allowed to be discharged and to limit the discharge of specified indicator microbes harmful to human health.

The convention applies to existing tugs and offshore vessels, as well as those being built. Ships under construction whose keel was laid on or after 8 September 2017 must conduct ballast water management that at least meets the D-2 standard from the date they are put into service. For existing ships, the date for compliance is linked with the renewal of the ship’s International Oil Pollution Prevention Certificate after September 2019. Some authorities are progressing enforcement ahead of the IMO timeline. Since 21 June 2012, the US Coast Guard (USCG) ballast water regulations require vessels that discharge ballast in US waters to either install a treatment system or manage their ballast water in another approved way. In August 2017 the USCG issued a US$5,000 fine to the operator of a vessel for unauthorised ballast water discharge into the Willamette River in Portland, Oregon. In September, the California State Lands Commission issued a letter to clarify the new requirements for vessels arriving at US ports on or after 1 October 2017, making clear its position on compliance with the convention.

Saudi Arabia is also enforcing ballast water regulations following the announcement by the world’s largest oil producer, Saudi Aramco, that all vessels calling at its ports will be required to provide a ballast water sample and report. Saudi Aramco is among the highest receivers of ballast water from ships, with more than 180m tonnes of ballast water discharged during cargo operations.

Tug and OSV operators and owners must therefore consider carefully both the form and scope of operations of current and future vessels to determine how the convention applies to them. Smaller vessels working within the same coastal waters may not be impacted directly. Large support vessels with the capacity and flexibility to work anywhere in the world need to look at their prospective markets. Training of personnel to operate a BWT system and interpret the compliance data should also not be overlooked.

There may be a further consequence for smaller support vessels, depending on the actions taken by large vessel owners who may choose to delay capital investment in BWT. Vessels without a BWT system will not be able to trade with any ports in countries that have enforced the convention, which will also impact its support vessels.

Chelsea Technologies Group (CTG) has direct experience of compliance and the high standards demanded by regulators. CTG’s FastBallast Compliance Monitoring System was identified as the most accurate solution on the market for sampling ballast water by Saudi Aramco’s in-house marine biology experts, and will be used to conduct spot checks on sampling undertaken by third-party sampling companies.

FastBallast is the only technology capable of operating in a flow-through mode, while providing a high degree of accuracy with a representative report on discharge compliance. It is capable of determining the phytoplankton cell density of ballast water to IMO D-2 and USCG discharge standards (10-50µm range), with a higher degree of confidence than laboratory analysis. Global Strategic Alliance Saudi Arabia, CTG’s agent for Saudi Arabia and Bahrain, is working closely with the Saudi authorities to utilise FastBallast as the national benchmark for ballast water sampling.

Saudi Aramco and the USCG have set high environmental standards and are driving change ahead of regulations, and it is clear that ballast water monitoring and the issue of compliance is here to stay. Support vessel owners and operators should take steps now, both to maintain the asset value of their craft and to future-proof their operational freedom. Failure to do so may result in reduced opportunities, lower profitability, and relegation to the second division of environmental leadership.