

MARINE ENVIRONMENT PROTECTION  
COMMITTEE  
78th session  
Agenda item 9

MEPC 78/9  
9 March 2022  
Original: ENGLISH  
Pre-session public release: ☒

## **POLLUTION PREVENTION AND RESPONSE**

### **Comments on document MEPC 76/9/5**

#### **Submitted by IACS**

##### **SUMMARY**

*Executive summary:* This document comments on document MEPC 76/9/5 containing proposed changes to the draft amendments to appendix II of MARPOL Annex I, the draft ORB guidance and the draft 2020 IBTS guidelines

*Strategic direction, if applicable:* 2

*Output:* 2.13

*Action to be taken:* Paragraph 8

*Related documents:* MEPC 76/9/5, MEPC 76/15 and MEPC 77/16

#### **Background**

1 Document MEPC 76/9/5 (INTERTANKO) offered comments on the draft 2020 IBTS guidelines and associated draft documents, as a follow-up to the discussion held at PPR 7. Owing to time constraints, MEPC 76 agreed to defer the document to MEPC 77.

2 MEPC 77, having considered the Chair's proposals, decided to defer consideration of the document to MEPC 78 to allow the Committee to provide clear instructions to the PPR Sub-Committee on how to proceed in relation to onboard management of oily bilge water and associated record-keeping.

3 IACS appreciates the comments made by INTERTANKO in document MEPC 76/9/5 and considers that some issues still need further clarification. To facilitate the discussion on document MEPC 76/9/5 at MEPC 78, IACS is pleased to provide further considerations as in the paragraphs below.

#### **Discussion and proposals**

##### ***Evaporation of bilge and associated record-keeping***

4 In respect of the discussion in paragraphs 4 to 10 of document MEPC 76/9/5 on the evaporation of bilge water and associated record-keeping, IACS is of the view that the question

of the acceptability of forced evaporation of bilge water for the purposes of disposal needs clarification. IACS believes that clear guidance on the fundamental issue should be provided to the PPR Sub-Committee. If the Committee decides that forced evaporation of bilge water for the purposes of disposal is not acceptable, IACS considers that the prohibition should be clearly reflected in the MARPOL Convention.

***Deletion of new example 10-1 in the draft ORB guidance***

5 With regard to the discussion and recommendation in paragraphs 12 to 16 of document MEPC 76/9/5 related to the deletion of new example #10-1 in the draft Oil Record Book (ORB) guidance, IACS considers that, even though the bilge separation unit is no longer defined as a bilge tank, the content in the unit is still bilge water.

6 In this regard and for the sake of transparency when recording, IACS supports having example #10-1 in the MEPC circular on the Guidance for the recording of operations in the Oil Record Book Part I – machinery space operations (all ships), as set out in annex 15 to document PPR 7/22/Add.1.

***Changes to "Figure 2 – Flow diagram of Integrated Bilge Water Treatment System (IBTS)"***

7 In relation to paragraphs 17 to 19 of document MEPC 76/9/5, IACS supports the proposal to amend the IBTS flow diagram.

**Action requested of the Committee**

8 The Committee is invited to consider the foregoing and take action as appropriate.

---