



NEWS BRIEF
PPR 10





NEWS BRIEF: PPR 10

The IMO Sub-Committee on Pollution Prevention and Response (PPR) held its 10th session from April 24 to 28, 2023. This Brief provides an overview of the more significant issues progressed at this session.

KEY DEVELOPMENTS

- New 2023 Guidelines for Thermal Waste Treatment Devices (TWTD)
- Verification of Ballast Water Compliance Monitoring Devices
- Inventory of Hazardous Materials – Cybutryne
- Developing Guidance on Transport of Plastic Pellets by Container or in Bulk
- Evaluation of Products and Cleaning Additives

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PREVENTION OF AIR POLLUTION FROM SHIPS

Reduction of the Impact on the Arctic of Emissions of Black Carbon from International Shipping

The Sub-Committee continued work from previous sessions on development of draft guidelines on goal-based control measures to reduce the impact on the Arctic of Black Carbon (BC) emissions from international shipping. After extensive discussion, the Sub-Committee agreed to establish a Correspondence Group that will seek to finalize draft guidelines on recommendatory BC emission data collection and reporting, as well as draft guidelines on recommendatory goal-based control measures to reduce the impact on the Arctic of BC emissions from international shipping. The Sub-Committee also discussed a list of potential BC control measures, and invited Member States and international organizations to further develop proposals on potential BC control measures and submit those to the next session. Subsequently, the Sub-Committee will also recommend to the Committee the extension of the target completion year of this work to 2025, to allow for further work on potential control measures.

Next Steps: Work on this subject will continue in an intersessional correspondence group, to continue the development of the draft guidelines on recommendatory goal-based control measures to reduce the impact on the Arctic of Black Carbon emissions from international shipping and submit a report to PPR 11 (Feb. 2024).

Standards for Shipboard Gasification of Waste Systems and Associated Amendments to Regulation 16 of MARPOL Annex VI

The Sub-Committee finalized the draft *2023 Guidelines for Thermal Waste Treatment Devices (TWTG)*, which are developed based on a technology-neutral, goal-based approach that can be applied to any TWTG, such as gasification, hydrothermal carbonization, pyrolysis, or other thermal means for the disposal of permitted garbage during a ship's normal service. These guidelines follow a goal-based approach that requires the in-service monitoring and record keeping of specified emissions, the identification of Functional Objectives for such devices and development of a TWTG Technical Report that demonstrates resolution of each Functional Objective. The guidelines also set maximum emission limits, with respect to air discharges – Performance Level 1 and tighter Performance Level 2, water discharge to sea and treatment of TWTG residues. The TWTG Technical Report shall



cover at least the specified Functional Objectives in order to achieve the in-service Performance Level 1 emission limit requirements and, if applicable, those of Performance Level 2. Certification of TWTD is divided into two parts, approval of the proposed TWTD under Regulation 4 of MARPOL Annex VI and secondly approval of individual units of TWTD.

Next Steps: The finalized draft *2023 Guidelines for Thermal Waste Treatment Devices (TWTD)* will be presented to MEPC 80 (July 2023) for consideration and adoption.

Revision of Regulation 13.2.2 of MARPOL Annex VI to Clarify that a Marine Diesel Engine Replacing a Boiler Shall Be Considered a Replacement Engine

Under Regulation 13.2.2 of MARPOL Annex VI, the replacement of a marine diesel engine by a non-identical marine diesel engine or the installation of an additional marine diesel engine is considered a major conversion, and the NO_x Technical Standards at the time of the replacement or addition of the engine shall apply. Furthermore, Regulation 13.2.2 contains an exemption clause for the replacement of a marine diesel engine with a non-identical one which states that when it is not possible for such replacement engine to meet the Tier III standard, it shall meet the Tier II standard. The Sub-Committee received a proposal to clarify – relying on the fact that a marine diesel engine is more efficient compared to old auxiliary boilers – that the replacement of “steam system” by a marine diesel engine shall be considered a “replacement engine”.

After discussion, the Sub-Committee agreed with this proposal, and Regulation 13.2.2 will consequently be amended to clarify that when clause 13.2.2 is applied to a replacement of a “steam system” with a marine diesel engine, the Party shall notify the Organization accordingly. The Sub-Committee also finalized the draft *2023 Guidelines as Required by Regulation 13.2.2 in Respect of Non-Identical Replacement Engines Not Required to Meet the Tier III Limit*, to include the case where a marine diesel engine is to be installed to replace a steam system that engine to be considered a replacement engine.

Next Steps: The above amendment was approved and will be presented to MEPC 80 (July 2023) for further consideration and approval with a view to adoption at MEPC 81 (Apr. 2024).

Unified Interpretation to Provisions of IMO Environment-Related Conventions (Proposed Amendments to Unified Interpretations to MARPOL Annex VI)

The Sub-Committee agreed on two Unified Interpretations related to MARPOL Annex VI:

1) *Regulation 13 of MARPOL Annex VI – Nitrogen Oxides (NO_x)*

The approval of revision of Regulation 13.2.2 which recognizes that the installation of a marine diesel engine in place of a “steam system” is considered as a replacement engine allowing also for the applicability of clause 13.2.2, requires the consequential amendments of sections 6 and 7 of circular MEPC.1/Circ.795/Rev.7 accordingly.

2) *Regulation 18 of MARPOL Annex VI – Fuel oil availability and quality*

A proposal was made for a Unified Interpretation to clarify that bunker delivery notes are acceptable in either hard copy or digital form providing they meet the relevant requirements of MARPOL Annex VI. The interpretation makes acceptable the use of e-BDNs provided they contain at least the required information specified in MARPOL Annex VI. Furthermore, they shall be protected from edits and authentication shall be possible by a verification method such as date and time stamp, tracking number, QR code, GPS coordinates, watermark or other verification methods.

Next Steps: The above-noted Unified Interpretations were agreed and will be presented to MEPC 80 (July 2023) for approval and inclusion in a revision of MEPC.1/Circ.795/rev.7.



Draft Amendments to the 2019 Guidelines for On Board Sampling for the Verification of the Sulphur Content of the Fuel Oil Used onboard Ships (MEPC.1/Circ.864/Rev.1)

The Sub-Committee considered proposals to revise the *2019 Guidelines for On Board Sampling for the Verification of the Sulphur Content of the Fuel Oil Used On Board Ships* (MEPC.1/Circ.864/Rev.1). It was noted that for the case of the emergency generator fuel oil tank sampling point, compliance is challenging to achieve due to the limited size of the emergency generator room and the limited space in the fuel lines between the fuel tank and the generator. Because of these conditions, it was proposed to use the drain valve as a representative fuel sampling point of the emergency generator tank, under the conditions that a protocol is developed to ensure that the sample will not contain water that could distort the analysis of the fuel and that the fuel oil sample is taken after the tank is drained of any sediment or water. However, without adequate support from Member States, the Sub-Committee decided to keep the Guidelines unchanged.

Additionally, the Sub-Committee considered proposed amendments to MEPC.1/Circ.864/Rev.1 to address sampling of low-temperature, poor performance of cold fluidity fuel oil when navigating in cold regions, a situation that can lead to clogging of the sampling point along with further specifications for Administrations on sample handling and size. After consideration, these proposed amendments were also not supported by the Sub-Committee.

Next Steps: In the absence of adequate support, these proposed amendments to MEPC.1/Circ.864/Rev.1 will not move forward, and the Guidelines will remain unchanged.

Volatile Organic Compound (VOC) Emissions

With the aim of investigating how the reduction of Volatile Organic Compound (VOC) emissions could contribute to the implementation of the IMO GHG Strategy, the Sub-Committee finalized a draft scope of work for developing means of reducing Volatile Organic Compound (VOC) emissions from ships. The draft scope of work includes:

- 1) Involvement of terminals in the reduction of VOC;
- 2) Consideration of new and existing regulations and guidance documents on VOC, including the application of a revised Regulation 15 of MARPOL Annex VI, considering ship design safety and effectiveness along with safety of ship operations;
- 3) Requesting input from SSE Sub-Committee with a view to advising the PPR Sub-Committee;
- 4) Giving recommendation to the Committee on how to proceed with an improved framework for the reduction of VOC emissions.

Next Steps: The finalized draft scope of work will be submitted to MEPC 80 (July 2023) for further consideration and endorsement.

MARINE BIOSAFETY

Review of the 2011 Guidelines for the Control and Management of Ship's Biofouling (Resolution MEPC.207(62))

The Sub-Committee received a report providing draft revisions to the 2011 Biofouling Guidelines. After consideration, the Sub-Committee agreed to remove Chapter 7 (Biofouling Risk Profile and Monitoring of Risk Parameters) and to include a new chapter of Contingency-Action Plans (Chapter 7) that will be followed if the monitoring of biofouling risk parameters during ship operation identify an increased risk of biofouling accumulation. Such plans can include proactive actions to lower the risk of biofouling accumulation, corrective actions to operating profile and maintenance, or inspection to determine biofouling accumulation by the ship's crew (provided it is qualified to use relevant inspection equipment) or an independent inspection organization. In addition, the Sub-



Committee decided to delete from Chapter 8 Table 2, fouling rating 2 and the retention of one microfouling rating as the distinction between light and heavy microfouling could be tough. For Chapter 9 (Cleaning and Maintenance), the Sub-Committee decided to address the guidance on in-water cleaning separately at a future session, with a target year of completion in 2025, and invited Member States and international organizations to provide concrete proposals. Moreover, under general support, the Sub-Committee agreed on the inclusion of forms for the Biofouling Management Plan (BFMP) and Biofouling Record Book (BRFB).

Next Steps: The finalized *2023 Guidelines for the Control and Management of Ships' Biofouling to Minimize the Transfer of Invasive Aquatic Species* will be submitted to MEPC 80 for adoption. In addition, Member States and international organizations are invited to work intersessionally and submit concrete proposals on guidance related to in-water cleaning with a target completion year for the "Development of guidance on matters relating to in-water cleaning" of 2025.

Protocol for Verification of Ballast Water Compliance Monitoring Devices

Continuing work from the previous session, the Sub-Committee agreed on a finalized Protocol for Verification of Ballast Water Compliance Monitoring Devices. In particular, the goal of the protocol is to provide a framework under which it is possible to verify the ability of a Compliance Monitoring Device (CMD) to assess non-compliance with the D-2 standard, supporting the effective implementation of the BWM Convention. Section 8.4 of the Protocol defines a list of verification success criteria that the CDM shall be able at minimum to meet:

- Precision (Repeatability): A coefficient of variance (CV) less than 25% is considered as acceptable, whereas less than 10% demonstrates excellent repeatability;
- Reliability: Expressed as the percentage of the data recovered versus the data that the CDM was intended to collect over a certain period. Acceptable values are more than 90%;
- Agreement between CDM and detailed analysis results: At minimum, 80% of the CDM results shall agree with the relevant detailed analysis results.

Next Steps: The Protocol for the verification of ballast water compliance monitoring devices will be presented to MEPC 80 (July 2023) for approval and subsequent release as a new BWM.2 circular.

Unified Interpretation for the "Date of construction" on the IBWMC and application of D-2 standard after a ship has undergone a major conversion

Sub-Committee considered a proposed unified interpretation to the Form of the International Ballast Water Management Certificate (IBWMC), regarding the "Date of construction" for a ship that has undergone a major conversion, and the date until which a ship that has undergone a major conversion on or after 8 September 2017 shall comply with D-2 Standard as per Regulation B-3.5.

- For the former, the Sub-Committee agreed on an interpretation stating that for a ship which has undergone a major conversion, the date of the commencement of the major conversion should be filled in the "Date of construction" in the Form of the IBWMC.
- For the latter, it was agreed that for a ship constructed before 8 September 2017, which has undergone a major conversion on or after that date, it shall be considered as constructed on or after 8 September 2017 and comply with Regulation B-3.5 Furthermore, if the major conversion has happened before the IOPP renewal survey, the ship shall meet the D-2 standard from the date of major conversion completion and if that major conversion occurred after the IOPP renewal survey, ship shall meet the D-2 standard from the date of completion of the renewal survey.

Next Steps: The Unified Interpretations were agreed and will be presented to MEPC 80 (July-2022) for approval and inclusion in a revision of BWM.2/Circ.66/Rev.5.



Guidelines for the Development of the Inventory Hazardous Materials

The Sub-Committee finalized the draft text of *2023 Guidelines for the Development of the Inventory of Hazardous Materials* to cover the controls on cybutryne governed by the AFS Convention. In Table A of Appendix I (Items to be listed in the Inventory of Hazardous Materials) and Table A of Appendix 6 (Form of Material Declaration), an additional row was included for anti-fouling systems containing cybutryne as a biocide, Appendix 5 was amended accordingly to account also for cybutryne as a material that shall be listed under Table A and in Appendix 8, Section 4 was modified to include specific test methods for determining the concentration of cybutryne.

Next Steps: The *2023 Guidelines for the Development of the Inventory of Hazardous Materials* were finalized and will be submitted to MEPC 80 (July 2023) for adoption.

POLLUTION PREVENTION AND RESPONSE

Draft Operational Guide on the Response to Spills of Hazardous and Noxious Substances (HNS)

The Sub-Committee finalized a draft “Operational Guide on the Response to Spills of Hazardous and Noxious Substances (HNS)”, after several modifications that ensure international applicability and scope. The guide was divided into two sections, one addressing preparedness and the other addressing response.

Next Steps: The finalized *Operational Guide on the Response to Spills of Hazardous and Noxious Substances (HNS) - Volume 1 (Preparedness) and Volume 2 (Response)* will be submitted to MEPC 80 (July 2023) for approval and subsequent publication.

Review of the IBTS Guidelines and Amendments to the IOPP Certificate and Oil Record Book

The Committee at MEPC 78 approved in principle that forced evaporation was acceptable as a means for the disposal of oily bilge water and invited proposals to PPR 10 to amend MARPOL Annex I accordingly. In that order, the Sub-Committee considered several documents supporting the deletion of example 10-1 in the draft Oil Record Book (ORB) guidance, proposed modifications to the draft revised IBTS Guidelines and comments regarding the requirements that clean bilge water shall be discharged overboard only when vessel is in transit along with safety aspects arising from forced evaporation. Due to absence of proposals to amend MARPOL Annex I accordingly – to consider forced evaporation of oily bilge water as an appropriate mean of disposal – the Sub-Committee decided to forward all relevant documents to the next session, with the target to completing the amendments to PPR 11.

Next Steps: Work on this subject will be further progressed at PPR 11, with the target completion year for this work moved out to 2025.

Development of Measures to Reduce Risks of Use and Carriage of Heavy Fuel Oil as Fuel by Ships in Arctic Waters

The Sub-Committee at PPR 8 agreed in principle to the version of the draft guidelines on mitigation measures to reduce risks of use and carriage for use of heavy fuel oil (HFO) as fuel by ships in Arctic waters and requested from NCSR 9 to review section 2 (Navigational measures), from SDC 8 to review paragraph 4.4 (the location of fuel tanks) and from HTW 8 to review section 7 (Familiarization, training and drills). At PPR 9, the Sub-Committee noted the input from SDC 8 and HTW 8, and since NCSR 9 was to take place after PPR 9, decided to continue the work on this matter at PPR 10, when the output of NCSR 9 would be available. NCSR 9, suggested to the Sub-



Committee to limit the scope of the draft guidelines only to ships using HFO as fuel, or carrying HFO for use, in Arctic waters, which are not currently covered by the Polar Code or other IMO instruments. In addition, HTW 9 agreed to the proposed amendments with respect to the familiarization, training and drills in sections I and II of the draft guidelines. Due to the fact that no further groups could be established at the current session, the Sub-Committee decided to finalize the draft guidelines at PPR 11 and submit them for approval at MEPC 81.

Next Steps: Work on this subject will be further progressed at PPR 11, with the target completion year for this work moved out to 2024.

MARINE PLASTIC LITTER FROM SHIPS

Maritime Transport of Plastic Pellets in Freight Containers

The Sub-Committee agreed on the text of a draft MEPC circular providing recommendations for the carriage of plastic pellets by sea in freight containers. Pending the consideration of future mandatory measures for the carriage of plastic pellets in freight containers, this circular provides a short-term measure with the aim of reducing the environmental risks associated with the carriage of plastic pellets in packaged form by sea. The draft circular provides recommendations on packaging, transport information and special stowage considerations so as to minimize the risk of losing freight containers containing plastic pellets. A definition for the term “plastic pellets” in this context is also provided, which is intended to mean “solid polymeric substances, or blended mixtures (consisting of polymers and other substances of varying percentages), that are insoluble in water and transported in granule or nurdle form, or as powder or flakes. Plastic pellets include, but are not limited to, polymers such as polyethylene, polypropylene, polystyrene, polyethylene terephthalate, or polyvinyl chloride.

Next Steps: For a thorough consideration of cargo packaging recommendations discussed in the draft MEPC circular, the Sub-Committee will request input from the Sub-Committee on Carriage of Cargoes and Containers (CCC) on this subject at the CCC 9 meeting (Sept. 2023), after which the draft circular will be presented to the Committee for approval.

Additionally, the Sub-Committee developed a table of potential instruments that could form a legal basis for mandatory provisions for the maritime transport of plastic pellets in freight containers. The possible routes for establishing such mandatory provisions are focused on potential future amendments to MARPOL Annex III or V, and will be discussed further at a future session of the Sub-Committee.

Preventing Shipment of Plastic Pellets in Bulk

Noting past incidents of the loss of freight containers at sea which contained plastic pellets, the Sub-Committee also discussed the potential for shipment of plastic pellets in bulk under the IMSBC Code (either under a tripartite agreement or possibly using the existing schedule for “Chopped Rubber and Plastic Insulation”). In discussions, it was strongly agreed that plastic pellets should not be carried in bulk, as an incident with a bulk carrier fully laden with plastic pellets would cause permanent impacts on the marine environment. However, the prevalence of bulk shipment of plastic pellets was not yet clear to the Sub-Committee, and therefore the benefits and implications of a possible prohibition of transport of plastic pellets in bulk could not be determined at this stage.

Next Steps: The Sub-Committee will request clarification from the Sub-Committee on Carriage of Cargoes and Containers (CCC) on how plastic pellet cargoes should be considered under the IMSBC Code at the CCC 9 meeting (Sept. 2023). Member States and international organizations are also to submit relevant proposals to a



future session of the Sub-Committee on potential regulatory changes that may be needed to prevent the shipment of plastic pellets in bulk.

Reporting the Loss or Discharge of Fishing Gear

The Sub-Committee continued discussions from past sessions on the matter of establishing a mandatory reporting measure for the loss or discharge of fishing gear. Discussion focused on thresholds for reporting, application to recreational vessels and the establishment of a database for this information. It was agreed that any reporting thresholds established should be globally consistent and should not be mandatory for recreational vessels. It was also agreed that the confidentiality of data submitted to the database would be prioritized, and that the overall objective of the database would be to provide the Organization and Member States a database to measure trends and monitor the loss and discharge of fishing gear at the national and international levels, in order to better allocate resources to address identified areas experiencing concentrated problems with fishing gear loss.

Next Steps: Work on this subject will be progressed by an intersessional correspondence group and discussed further at PPR 11 (Feb. 2024). Matters to be addressed include the specific scope and method of data collection, control of access to the data, and whether MARPOL Annex V should be amended to include fishing gear reporting requirements.

Draft Guidelines on Clean-Up of Plastic Pellets from Ship-Source Spills

The Sub-Committee received a proposal for the development of guidance on best practices for responding to ship-source spills of plastic pellet cargoes. The proposed guidelines provide broad advice on contingency planning and organization of responses to such spills and emphasize the development of large-scale strategies as part of National Contingency Plans (NCPs) as well as smaller site-specific response strategies through Local Contingency Plans (LCPs). The draft text of these guidelines addresses five points of response planning:

- 1) Understanding of the basic physical and chemical properties of plastic pellets and their mobility in the marine environment
- 2) Designation of a lead response organization
- 3) Details of spill assessment / surveillance and clean-up strategies
- 4) Techniques for post-spill monitoring and analysis
- 5) Identification of responsible parties and cost-recovery regimes in current legislation

Development of these guidelines will be further pursued in support of the IMO's objective to mitigate the environmental impact of marine plastic litter from shipping, and to provide Member States with practical guidance that can support this effort.

Next Steps: Work on this subject will be progressed by an intersessional correspondence group and discussed further at PPR 11 (Feb. 2024).

EVALUATION OF SAFETY AND POLLUTION HAZARDS OF CHEMICALS

Provisional Categorization of Liquid Substances in Accordance with MARPOL Annex II and the IBC Code (MEPC.2 Circular) – Evaluation of Products and Cleaning Additives

The Sub-Committee was presented with the report of the 28th session of the Working Group on the Evaluation of Safety and Pollution Hazards of Chemicals (ESPH), which is tasked to regularly review safety and pollution



prevention requirements for various chemical cargoes and chemicals used onboard ships. The Working Group is responsible for maintaining the MEPC.2 Circular, *Provisional Categorization of Liquid Substances in Accordance with MARPOL Annex II and the IBC Code*, and to provide carriage guidance for substances which have not yet been fully categorized and reflected in the IBC Code.

In the course of the Working Group's activity:

- 1) 1 new substance was added to the MEPC.2 Circular
 - a. Fast pyrolysis bio-oil (FPBO)
- 2) 2 existing substances were reassessed for inclusion in the MEPC.2 Circular
 - a. OLOA 54013 (trade-named mixture)
 - b. OLOA 9999 (trade-named mixture)
- 3) 7 cargo tank cleaning additives were added in the MEPC.2 Circular, and 1 cargo tank cleaning additive was revised in the MEPC.2 Circular; and
- 4) 1 product was deleted from the MEPC.2 Circular, after reassessment finding it to meet the criteria for complex mixtures in MEPC.1/Circ.512/Rev.1, and will now be shipped under MARPOL Annex I.

Next Steps: The above assessment of products and cleaning additives will be reflected in the next edition of the MEPC.2 circular, which will be MEPC.2/Circ.29, due to be issued on 1 December 2023.

Draft Amendments to PPR.1/Circ.7 – Decisions With Regard to the Categorization and Classification of Products

The Sub-Committee agreed to update the PPR.1 circular which describes all relevant decisions in relation to the assignment of carriage requirements under the IBC Code. Among several changes was added guidance on categorization of mixtures containing MARPOL Annex I components, as well as a cross-reference to the recently approved PPR.1/Circ.9, *Revised Carriage Requirements For Methyl Acrylate And Methyl Methacrylate*.

Next Steps: The revised circular will be considered for approval at MEPC 80 (July 2023).

Draft Amendments to MEPC.1/Circ.590 – Revised Tank Cleaning Additives Guidance Note and Reporting Form

The Sub-Committee began work on updates to guidance providing concise information to manufacturers of cargo tank cleaning additives to assist them when submitting their products for assessment as cargo tank cleaning additives under MARPOL Annex II and for inclusion in annex 10 of the MEPC.2/Circular. Changes were drafted to include additional information to be submitted for proposed cargo tank cleaning additives, as well as edits to the reporting form accompanying such submissions. Further proposed changes could not be agreed upon at this session, and work on these draft amendments will continue at a future session.

Next Steps: Revision of this circular will be further considered at the next session of the ESPH Working Group (Oct. 2023).

OTHER DEVELOPMENTS

Draft Amendments to MARPOL Annex IV – Lifetime Performance of Sewage Treatment Plants

The Sub-Committee considered the work progressed by an intersessional Correspondence Group for amendments to MARPOL Annex IV for enhancing and monitoring the performance of sewage treatment plants (STPs). The amendments include requirements for an STP installation survey, a commissioning survey requirement (tentatively



12-months after the installation), and a periodic performance evaluation (tentatively every 5 years as a renewal survey) requiring sampling and testing. New regulations would also require ships equipped with STPs to maintain onboard a sewage management plan and a sewage record-keeping book for recording all discharges, incinerations and sampling related to the STP. Sampling points for the STP effluent would also be required to be fitted to facilitate performance monitoring. A new Appendix III to MARPOL Annex IV would provide testing standards for effluent parameters (including turbidity, total suspended solids, biochemical and chemical oxygen demand, pH and total residual oxidant) for new STPs and, retroactively, to existing STPs. A new Appendix IV would provide a format of the Sewage Record Book for recording related operations.

In discussion at this session, the Sub-Committee reiterated that a sewage management plan and sewage record-keeping book should be required for all vessels under MARPOL Annex IV. Because of this, there is a procedural need for the Committee to endorse this as an expansion of the original scope of work under this agenda item. There was also general agreement in the Sub-Committee that fitting of comminuting and disinfecting systems (CDS) should not be allowed as a replacement of an existing STP or of a holding tank on existing ships.

Consideration still remains to be finalized regarding application provisions for existing ships, the adequacy of supporting STP standards and implementation guidance, and concerns of inadequacy at port reception facilities.

Next Steps: Work on this subject will be further progressed in an intersessional correspondence group and further discussed at PPR 11 (Feb. 2024), pending the approval of the expanded scope of work by MEPC 80 (July 2023), with the target completion year for this work moved out to 2025.



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