

SUB-COMMITTEE ON POLLUTION  
PREVENTION AND RESPONSE  
8th session  
Agenda item 7

PPR 8/7/9  
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**REVISION OF MARPOL ANNEX IV AND ASSOCIATED GUIDELINES TO INTRODUCE  
PROVISIONS FOR RECORD-KEEPING AND MEASURES TO CONFIRM THE  
LIFETIME PERFORMANCE OF SEWAGE TREATMENT PLANTS**

**Comments on document PPR 8/7**

**Submitted by IACS**

**SUMMARY**

*Executive summary:* This document comments on document PPR 8/7 (Norway) containing the report of the Correspondence Group on Amendments to MARPOL Annex IV and Associated Guidelines, and provides proposals to facilitate the consideration and development of amendments to MARPOL Annex IV and associated guidelines

*Strategic direction,  
if applicable:* 1

*Output:* 1.26

*Action to be taken:* Paragraph 14

*Related documents:* PPR 7/22 and PPR 8/7

**Introduction**

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.2) and provides comments on document PPR 8/7 submitted by Norway as the coordinator of the Correspondence Group on Amendments to MARPOL Annex IV and Associated Guidelines.

**Background**

2 PPR 7 agreed to progress the work on revision of MARPOL Annex IV and associated guidelines to introduce provisions for record-keeping and measures to confirm the lifetime performance of sewage treatment plants intersessionally through a correspondence group with the approved terms of reference set out in paragraph 16.9 of document PPR 7/22 (Secretariat).

3 IACS actively participated in the Correspondence Group and would like to thank the coordinator and members of the group for their cooperation. IACS proposals which were submitted to the Correspondence Group were mostly reflected in the report and incorporated into the draft amendments to MARPOL Annex IV and the *revised 2012 Guidelines on implementation of effluent standards and performance tests for sewage treatment plants*, as set out in annexes 1 and 2 to document PPR 8/7 respectively.

4 In order to facilitate the discussion during PPR 8 and to further the development of the draft amendments to MARPOL Annex IV and the 2012 Guidelines, IACS is pleased to provide additional considerations in the paragraphs below.

## Discussion

### Draft amendments to MARPOL Annex IV

5 Newly added draft regulations 9.3, 11B.1 and 11B.3 of MARPOL Annex IV state:

"9... [3 Provisions in regulation 9.1.1 and 9.2.1 apply to new ships and all ships not later than [dd.mm.20yy].]";

"11B.1 This regulation applies to [new] ships [and all ships not later than [dd.mm.20yy,]] fitted with a sewage treatment plant, in accordance with regulation 9.1.1 or 9.2.1.";

and

"[11B.3 New ships and all ships not later than [dd.mm.20yy], shall fit a turbidity meter [or other indicative parameter sensor] and flow measuring device in the effluent pipeline from the Sewage Treatment Plant, taking into account the standards and test methods developed by the Organization.\*"

6 IACS is of the view that the text of the above draft regulations covers the application of new requirements to both new and existing ships. IACS understands that the scope of application of new requirements is a policy issue which will be discussed in the Sub-Committee and decided by Member States at the time of adoption of amendments to MARPOL Annex IV. With that in mind, IACS offers its following views to assist in that process.

7 Since the definition of a "new ship" in regulation 1.1 of MARPOL Annex IV remains unchanged, IACS believes that the wording "new ships and all ships not later than [dd.mm.20yy]" appearing in the texts quoted in paragraph 5 above, is vague. Considering the context in the report of the Correspondence Group and draft amendments to MARPOL Annex IV, IACS opines that:

- .1 the wording "new ships" means ships constructed on or after [dd.mm.20yy], i.e. the date of entry into force of the amendments, and
- .2 the wording "all ships" means:
  - .1 new ships other than those constructed on or after [dd.mm.20yy], i.e. the date of entry into force of the amendments, and
  - .2 existing ships as defined in regulation 1.1 of MARPOL Annex IV.

8 In this regard, and assuming that the new requirements are applicable to both new and existing ships, IACS proposes modifications to those stated draft regulations, as follows\*:

"9...[.3 Provisions in regulation 9.1.1 and 9.2.1 apply to ~~new ships and all ships not later than [dd.mm.20yy]~~:

.1 ships for which building contract is placed, or in the absence of a building contract, the keel of which is at a similar stage of construction on or after dd.mm.20yy; and

.2 ships other than those specified in paragraph 1 above not later than dd.mm.20yy];

"11B.1 This regulation applies to:

.1 ~~[new] ships~~ for which the building contract is placed, or in the absence of a building contract, the keel of which is laid, or which is at a similar stage of construction on or after [dd.mm.20yy]; [and

.2 all ships other than those specified in paragraph .1 above not later than [dd.mm.20yy,]

which are fitted with a sewage treatment plant, in accordance with regulation 9.1.1 or 9.2.1."; and

"11B.3 ~~New ships and all ships not later than [dd.mm.20yy]~~, shall fit a A turbidity meter [or other indicative parameter sensor] and flow measuring device in the effluent pipeline from the Sewage Treatment Plant shall be fitted on:

.1 ships for which the building contract is placed, or in the absence of a building contract, the keel of which is laid, or which is at a similar stage of construction on or after [dd.mm.20yy] [the date of entry into force of amendments to MARPOL Annex IV]; and

.2 all ships other than those specified in paragraph .1 above not later than [dd.mm.20yy] [12 months after the date of entry into force of amendments to MARPOL Annex IV],

taking into account the standards and test methods developed by the Organization."

9 In addition to the above draft regulations, draft regulation 11A.3 of MARPOL Annex IV stipulates the provision of a Sewage Record Book, indicating that an electronic record system could be used as an alternative to a hard copy of a Sewage Record Book.

10 IACS is of the view that an electronic record system, or electronic record book, should be approved by the Administration taking into account the *Guidelines for the use of electronic record books under MARPOL* (resolution MEPC.312(74)), while the approval by the Administration of a hard copy of a Sewage Record Book should not be required, in line with MARPOL requirements applicable to other record books. Therefore, IACS proposes to modify the chapeau of draft regulation 11A.3 of MARPOL Annex IV to clearly reflect the above as follows:

\* Here and further in the text, tracked changes are indicated using "strikeout" for deleted text and "grey shading" to highlight all modifications and new insertions, including deleted text.

"11A.3 On or after [dd.mm.20yy] every ship shall be provided with a Sewage Record Book. The Sewage Record Book, whether as a part of the ship's official logbook, ~~or otherwise~~ or as a part of an electronic record system book, which shall be [approved by the Administration taking into account Guidelines developed by the Organization\*, or otherwise,] shall be in the form specified in appendix III to this Annex:"

#### **Draft amendments to the 2012 Guidelines**

11 Paragraph 4.4.1 of the draft amendments to the 2012 Guidelines recommends that the sewage treatment plant should be equipped with online measurement such as effluent flow meter and effluent turbidity sensor.

12 IACS believes that the word "online" could introduce a possible confusion, considering that many requirements for intelligent ships also use the term "online". To remove that possibility, IACS considers that the term "continuous" would reflect the same capability and suggests its use to replace the word "online" as follows:

"4.4.1 For demonstrating compliance with the design specifications during operation, the sewage treatment plant should be equipped with minimum the following ~~online~~ continuous measurement:"

#### **Proposals**

13 Based on the discussion in paragraphs 5 to 12, IACS proposes modifications to the draft amendments to MARPOL Annex IV and the 2012 Guidelines, as set out in paragraphs 8, 10 and 12.

#### **Action requested of the Sub-Committee**

14 The Sub-Committee is invited to consider the foregoing, specifically the proposals in paragraphs 8, 10 and 12, and take action as appropriate.

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