



IMO PPR 10 Meeting Summary

May 11, 2023

The 10th session of the IMO's Sub-Committee on Pollution Prevention and Response (PPR 10) was held 24-28 April 2023 in person, supplemented by hybrid (online) participation.

LISCR participated in the following group in addition to the plenary:

	Agenda item
WG 1	Working Group on Marine Biosafety
WG 2	Working Group on Prevention of Air Pollution from Ships
WG 3	Working Group on Marine Plastic Litter from Ships
TG 1	Technical Group on Evaluation of Safety and Pollution Hazards of Chemicals (ESPH TG)

Chemicals

Under this agenda item, the routine update of chemical substances (new products, cleaning additives etc.) was examined for release as MEPC.2 Circular, in relation to the task for the ESPH group.

Outcome of ESPH 28

PPR 10 noted the following was circulated as MEPC.2/Circ.28 in December 2022.

List 1 items (Pure or technically pure products and mixtures assessed as a whole)

In general, ESPH was still digesting various new cargoes associated with vegetable oil and its variants. Four new products were added.

List 3 items ((Trade-named) mixtures containing at least 99% by weight of components already assessed by IMO, presenting safety hazards)

12 new products were added.

Cleaning additives

22 additives were approved.

Additional products and cleaning additives for inclusion in the next MEPC.2 circular

During PPR 10, additional List 1 and List 3 products and cleaning additives were agreed upon for inclusion in the

next MEPC.2 Circular.

Revaluation of List 2 (Pollutant only mixtures containing at least 99% by weight of components already assessed by IMO) and List 3 products

The amendments to the IBC code adopted by MEPC.318(74) and MSC.460(101), respectively, which entered into force on 1 January 2021, require a review of pre-existing products. It should be noted that the current products evaluated by the previous version of the IBC Code should be re-evaluated by 31 December 2025 in accordance with PPR.1/Circ.10 *Resubmission of products listed in lists 2 and 3 of the MEPC.2 circular on Provisional categorization of liquid substances in accordance with MARPOL Annex II and the IBC Code.*

Categorization and classification of products

PPR 10 approved revised PPR.1/Circ.7 on *Decisions with regard to the categorization and classification of products* reflecting recent decisions, such as on SD rating, use of qualifier etc.

Toxic cargoes

It was recalled that this item had been originally included in the agenda of ESPH 26 to accommodate discussions regarding a lack of availability of toxic vapour detection equipment for many products in the revised chapter 17 of the IBC Code.

An industry NGO requested an amendment to the IBC Code to include using ventilation as an alternate means to

determine that a tank atmosphere is safe for entry on chemical tankers where no means of testing for toxicity exists.

At PPR 10, while agreeing to amend the IBC Code would require a new output (work programme), instructed the next meeting of the ESPH working group to look into the issue from a technical perspective.

HNS Convention

PPR 10 developed the *draft Operational Guide on the Response to Spills of Hazardous and Noxious Substances (HNS)*, for submission to the 80th session of the Marine Environment Protection Committee (MEPC 80) scheduled for July 2023. The guide provides operational guidance for first responders and decision-makers during a maritime incident at sea or in port.

Bio-security

Biofouling

Biofouling is the build-up of aquatic organisms on marine surfaces that can lead to the introduction of potentially invasive species to new environments, where they may threaten native species and cause irreversible damage to biodiversity. Additionally, biofouling increases the drag of ships.

PPR 10 developed the draft revised text of *the 2011 Guidelines for the control and management of ships' biofouling to minimize the transfer of invasive aquatic species* (MEPC.207(62)) as the 2023 guidelines for adoption by MEPC 80.

The revised guidelines describe recommended biofouling management practices, including initial ship design and construction and maintenance of anti-fouling systems. Further, the guidelines address the following:

- means to reduce ship biofouling risks, supplemented by anti-fouling systems (AFS) for all types of ships submerged or otherwise wetted surface areas, including hull and niche areas;
- the need for inspection and biofouling management, cleaning regime, and the overall risk of biofouling on the hull and in niche areas;
- cleaning actions based on a fouling rating number with an overall aim to minimize the risk of transfer of invasive aquatic species.
- ship specific contingency action plan, triggered by monitoring action, would be presented in the Biofouling management plan; and

- Record keeping

At this stage, guidelines on cleaning, proactive and reactive cleaning, are kept high-level while the IMO will work further to develop separate guidelines.

BWMC – date of construction upon major conversion

PPR 10 agreed on the following interpretations of the renewal survey in Regulations B-3.5 and B-3.10 that governs the installation date of the ballast water management systems.

A ship constructed before 8 September 2017, which has undergone a major conversion on or after 8 September 2017, should be deemed as a ship constructed on or after 8 September 2017 and comply with regulation B-3.5. If the major conversion has occurred before the renewal survey specified in regulation B-3.10, the said ship should meet the D-2 standard from the date of completion of the major conversion. If the major conversion has occurred after the renewal survey specified in regulation B-3.10, the said ship should meet the D-2 standard from the date of completion of the renewal survey specified in regulation B-3.10.

PPR 10 also agreed on the interpretation regarding the entry of the date in the International Ballast Water Management Certificate when a major conversion takes place:

For the International Ballast Water Management Certificate for a ship that has undergone a major conversion, the date of the commencement of the major conversion should be filled in the item "Date of construction".

Ballast Water Compliance Monitoring Devices

Indicative analyses are relatively quick and typically less precise than detailed analyses. They are usually conducted with discrete, easy-to-use, portable tools. These tools will be referred to as "ballast water compliance monitoring devices" (CMDs), although they may be used in instances other than for port State control inspections.

Having reviewed the work undertaken by the correspondence group, PPR 10 finalized the draft BWM.2 Circular on the Protocol for Verification of Ballast Water Compliance Monitoring Devices for approval by MEPC 80.

Air pollution

Black carbon

The IMO has been addressing black carbon under "Air Pollution" since MEPC 58 (2008).

Guidelines on Recommendatory Black Carbon Emission Data collection and reporting

PPR 10 worked on Draft *guidelines on recommendatory Black Carbon emission data collection and reporting*, and agreed on its principles:

However, there are still pending issues. PPR 10 agreed to continuously work on the subject by the air pollution correspondence group (CG).

Guidelines on Recommendatory Goal-based Control Measures

Discussion at PPR 10 was limited to generic discussion and structure of the guidelines. Further work will be undertaken by the CG.

Control measures

The CG established by PPR 9 in 2022 developed a list of the control measures, and there were further opinions expressed during PPR 10. However, PPR 10 could not reach an agreement and invited members to submit their opinions and proposal to the next session.

Gasification systems

PPR 10 finalized the draft 2023 guidelines for thermal waste treatment devices (TWTG) for adoption by MEPC 80.

These Guidelines are written on the basis of a technology neutral, goal based, approach that can be applied to any thermal waste treatment device using, for example, gasification, hydrothermal carbonization, pyrolysis, plasma or other thermal means for the disposal of permitted garbage and other shipboard wastes generated during a ship's normal service.

Replacing boilers

MEPC 74 approved a new output "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".

PPR 10 agreed on the following:

- In replacing a boiler with a diesel engine, if the space does not allow installing NO_x emission reduction device (e.g. SCR), Tier II engine may be accepted as "replacement engine" subject to approval by the Administration.
- In doing so, not only the boiler but also all steam systems have to be removed in order to secure sufficient space for installing a NO_x reduction device. Accepting Tier II engine is only after all attempts are demonstrated.
- Any party to the MARPOL Annex VI (not necessarily be the flag Administration) should notify the IMO

when Tier III engine was not possible (so Tier II engine is installed).

PPR 10 prepared draft amendments to regulation 13.2.2 of MARPOL Annex VI and *the 2013 Guidelines as required by regulation 13.2.2 in respect of non-identical replacement engines not required to meet the Tier III limit* (resolution MEPC.230(65) and draft Unified Interpretation of MARPOL Annex VI (revision to MEPC.1/Circ.795 series) for approval by MEPC 80 and subsequent adoption.

Electronic bunker delivery note

PPR 10, noting that electronic bunker delivery note is already being used by the industry, developed a unified interpretation on MARPOL Annex VI regulation 18 for accepting an electronic bunker delivery note as a temporary measure. The interpretation states:

The Bunker Delivery Note (BDN) required by regulation 18.5 is acceptable in either hard copy or electronic format provided it contains at least the information specified in appendix V to MARPOL Annex VI and is retained and made available on board in accordance with regulation 18.6. In addition, an electronic BDN should be protected from edits, modifications or revisions and authentication be possible by a verification method such as a tracking number, watermark, date and time stamp, QR code, GPS coordinates or other verification methods

The new unified interpretation of regulations 18.5 and 18.6 will be sent to MEPC 80 for approval and eventual inclusion in a revision of MEPC.1/Circ.795/rev.7.

Volatile Organic Compound (VOC) emissions

PPR 10 agreed that, in order to reduce VOC emissions, both ships and terminals have to work.

Oil pollution

HFO ban in the Arctic

MEPC 76 adopted the prohibition of the use and the carriage of Heavy Fuel Oil in the Arctic by Resolution MEPC.329(76), which will enter into force on 1 July 2024, but ships with protected fuel tank arrangements and domestic ships can be exempted until 1 July 2029. The ban does not include carriage as cargo.

Implementation guidelines

The PPR Sub-Committee is working on the remaining task, i.e., *Guidelines on Measures to Reduce Risks of Use and Carriage of Heavy Fuel Oil as Fuel by Ships in Arctic Waters*.

Editorial and legal issues were pointed out by other sub-committees that are consulted, and during the deliberation

of PPR 10.

Due to a lack of a working group slot, PPR 10 deferred the discussion to PPR 11.

Definition of HFO

A submission paper addressed the challenge of the recovery operation of high-pour point oil and proposed revisiting the definition of HFO, using a pour point as a criterion.

Many other delegations could not support amending the criteria in regulation 43 of MARPOL Annex I at this stage and were of the view that it was important to see the actual effects of regulation 43A of MARPOL Annex I before introducing any additional elements in those two carefully crafted regulations.

PPR 10 agreed to revisit this matter in 2025 following the effective date (1 July 2024) of the prohibition in regulation 43A of MARPOL Annex I.

Sewage

MEPC 78 revised the scope of work as follows:

- introduce provisions for record-keeping and measures to confirm the lifetime performance of sewage treatment plants;
- consider amending the definition of "person"; and
- prohibit fitting comminuting and disinfecting systems (CDS) on new ships.

PPR 10 agreed that:

- a sewage record book and sewage management plan should be required for all ships
- not accept the zero-discharge system, which was proposed to PPR 10 at this stage, and invited the submitter to propose a new output.
- Continue to work on the sewage issues by the correspondence group.

Plastic litter

MEPC 73 adopted the action plan to address marine plastic litter from ships (resolution MEPC.310(73)) (Action Plan). The issue also has been addressed at the London Convention meeting (shore generated plastic garbage that might end up at sea).

Plastic pellet

PPR 10 agreed on a two-stage approach, i.e. developing an MEPC Circular as recommendatory guidance and then considering suitable mandatory instruments.

PPR 10 developed a draft MEPC circular on the stowage of containers that carry plastic pellets. The draft circular recommends that such containers should be carried under deck spaces or onboard in sheltered spaces of exposed decks. PPR 10 agreed to consult the CCC Sub-Committee on the draft MEPC circular concerning packaging. The circular will be finalized by PPR 11 (February 2024) for submission to MEPC 81 (April 2024).

PPR 10 also agreed that plastic pellets should not be carried in bulk.

Options for mandatory instruments will be discussed in a future meeting.

PPR 10 considered that measures may not be applicable to plastic pellets for certain sizes (larger size plastic pellets) but could not agree on the threshold value.

PPR 10 also tasked a correspondence group to develop guidelines on the clean-up of plastic pellets from ship-source spills.

Inventory of Hazardous Materials

PPR 10 recalled that MEPC 76, through resolution MEPC.331(76), had adopted amendments to the AFS Convention, concerning controls on cybutryne, which had entered into force on 1 January 2023.

PPR 10 finalized the draft text of the 2023 guidelines for the development of the Inventory of Hazardous Materials for adoption by MEPC 80.

Further information

For further information please contact: imo@liscr.com

PROVISIONAL LIST OF DRAFT RESOLUTIONS AND CIRCULARS

- Draft of the Operational Guide on the Response to Spills of Hazardous and Noxious Substances (HNS);
- Draft revised text of the 2011 Guidelines for the control and management of ships' biofouling to minimize the transfer of invasive aquatic species (MEPC.207(62)) as the 2023 guidelines;
- Draft BWM.2 Circular on the Protocol for Verification of Ballast Water Compliance Monitoring Devices;
- Draft 2023 guidelines for thermal waste treatment devices (TWTD);
- In relation to the engines replacing a boiler:
 - Draft amendments to regulation 13.2.2 of MARPOL Annex VI
 - Draft amendments to the 2013 Guidelines as required by regulation 13.2.2 in respect of non-identical replacement engines not required to meet the Tier III limit (resolution MEPC.230(65))
 - Draft Unified Interpretation of MARPOL Annex VI (revision to MEPC.1/Circ.795 series)
- The new unified interpretation of regulations 18.5 and 18.6 of MARPOL Annex VI for inclusion in a revision of MEPC.1/Circ.795/rev.7.
- Draft text of the 2023 guidelines for the development of the Inventory of Hazardous Materials devices.