



# ST. VINCENT AND THE GRENADINES

## MARITIME ADMINISTRATION

### CIRCULAR N° BWM 005

#### **INTERIM GUIDANCE FOR SHIPS OPERATING IN CHALLENGING WATER QUALITY CONDITIONS [(MEPC.387(81)] AND GUIDANCE ON THE TEMPORARY STORAGE OF TREATED SEWAGE AND/OR GREY WATER IN BALLAST WATER TANKS (BWM.2/Circ.82)**

**TO: SHIPOWNERS, SHIPS' OPERATORS AND MANAGERS, MASTERS AND SURVEYORS TO THE FLAG STATE ADMINISTRATION, RECOGNIZED ORGANIZATIONS**

**APPLICABLE TO:** ALL SHIPS SUBJECT TO BWM CONVENTION  
**EFFECTIVE AS FROM:** Date of this circular

Date: 18 July 2024

#### **General**

The IMO MEPC adopted Resolution MEPC.387(81), with interim guidance for ships operating in challenging water quality conditions, and Circular BWM.2/Circ.82, with guidance on the temporary storage of treated sewage and/or grey water in ballast water tanks.

The purpose of this circular is to inform shipowners, ship operators, and managers about the need to comply with the Ballast Water Management (BWM) Convention and the D-2 discharge standard when a type-approved Ballast Water Management System (BWMS) encounters operational limitations or struggles to meet demands in challenging water quality (CWQ) conditions. Such conditions can cause temporary inoperability of the BWMS, for instance, due to filter clogging or operating beyond its design limitations.

The guidance does not address situations in which a BWMS is inoperable for reasons unrelated to CWQ, such as technical failures of the BWMS. Such situations should continue to be addressed on a case-by-case basis in accordance with the guidance on contingency measures under the BWM Convention (BWM.2/Circ.62).

The guidance does not cover instances where a BWMS (Ballast Water Management System) is non-functional due to issues unrelated to CWQ such as technical failures. These cases should be managed in accordance with the contingency measures outlined in the BWM Convention (BWM.2/Circ.62).

Additionally, the IMO has issued guidance on the temporary storage of treated sewage (TS) and/or grey water (GW) in ballast water tanks (BWM.2/Circ.82). This guidance outlines procedures for the temporary storage of TS and GW in ballast water tanks, detailing the required changeover process from ballast water storage to TS/GW storage, and vice versa. The discharge of ballast water and TS/GW should follow these principles:

- The discharge of ballast water must comply with the BWM Convention.
- The discharge of TS must adhere to MARPOL Annex IV where applicable, and any local TS/GW discharge requirements should also be taken into account.

The ship's BWMP (Ballast Water Management Plan) should include a ship-specific changeover procedure, specifying the pumps and piping used for dual-purpose ballast water tanks, along with detailed instructions on the flushing process.

### **Amendments to BWMP**

Ships should include procedures for managing CWQ conditions in their approved BWMP. The procedures for managing CWQ conditions should be ship-specific and consider the operational limitations of the BWMS installed and the operational patterns of the ship. These procedures should include the steps recommended by MEPC.387(81), annexed to this circular, and should outline the actions that the ship's crew can take to restore or maintain the effective operation of a BWMS when operating in CWQ conditions.

The amendments should include the following:

- Equipment maintenance procedures and intervals
- Predetermined mitigating measures to preserve and optimize the treatment process in marginal conditions
- A table of critical alarms that justify CWQ action
- Ship-specific alternatives to bypassing the BWMS
- Safe bypass procedures that minimize the exposure of tanks/piping to unmanaged water
- A decontamination procedure that reflects this Guidance and is safe for the ship and crew

If it becomes necessary to bypass the BWMS, it should be considered as a last resort. However, if bypassing cannot be avoided, only the minimal amount of ballast necessary to ensure the safety and operational requirements of the ship should be taken on board. Furthermore, after any bypass of the BWMS, the affected ballast tanks must undergo "decontamination" to restore compliance with the D-2 standard. Decontamination involves replacing the untreated ballast water in each affected tank through a process of ballast water exchange, flushing, and final treatment using the BWMS.

The necessity of implementing procedures for managing CWQ should be evaluated on a voyage-by-voyage basis. Even if there were prior CWQ issues at a specific location, efforts must be made to treat ballast water with the Ballast Water Management System (BWMS). CWQ conditions can differ between berths within the same port and may be influenced by ship operations or nearby port activities. Furthermore, CWQ conditions may fluctuate based on factors such as time of day, tide, weather conditions, or season.

Should the ship utilize temporary storage in ballast water tanks, updated guidelines concerning the temporary storage of treated sewage and/or grey water should be integrated into an amended BWMP.

Furthermore, shipowners, operators, and managers must ensure that crew training encompasses relevant aspects of this guidance, BWMS operating instructions, the environmental risks associated with BWMS bypassing, and measures to prevent or minimize these risks.

While approval of these amendments to the BWMP by a Recognized Organization (RO) is **not mandatory**, ship owners/managers may voluntarily seek RO approval if a BWMP is amended

with an addendum or appendix. However, if a revised BWMP includes new sections, RO approval is required.

Shipowners, operators, and managers need to prepare for the implementation of new IMO guidelines concerning the management of challenging ballast water and the temporary storage of treated sewage and/or grey water. They should update their BWMPs accordingly to ensure compliance with these guidelines.

Annexes to this circular:

MEPC.387(81)  
BWM.2/Circ.82