International Maritime Organisation (IMO)

Item: 3(a)(i)

BULK LIQIUDS AND GASES (BLG) SUBCOMMITTEE MEETING 16TH SESSION 30 JANUARY TO 4 FEBRUARY 2012

Discussion of BLG 16 Agenda Items

As agreed at the IR meeting in Puerto Rico and to help members focus on the IMO BLG 16 meeting which I will attend 30 Jan - 4 Feb 2012, this brief sets out a number of views that might be of interest on those items that might require our attention at this session. I have only commented where necessary:

Agenda Item 1: Adoption of the Agenda

Agenda Item 2: Decisions of Other IMO Bodies

Agenda Item 3: Evaluation of safety and pollution hazards (ESPH) of chemicals and preparation of consequential amendments

- 1. The ESPH will continue its discussion with a concentration on the review of Chapters 17 and 18 of the IBC¹ Code. Although this is a significant issue, the expertise required to carry out the review is within the ESPH Working Group and it therefore makes sense to have the Working Group carry out the work without the need for a new Unplanned Output.
- 2. The requirement to review the Code is a long term commitment over several sessions of the Sub-Committee. It is not anticipated that this will affect our sector.

Agenda Item 4: Development of guidelines and other documents for uniform implementation of the 2004 BWM Convention²

- 3. The Sub-Committee will continue the development of guidelines for the BWM Convention. As before, the main area of discussion will be the sampling routines to be adopted. Without these uniform and acceptable guidelines being in place, it is very difficult to see how ratification by more Flag States can take place.
- 4. Industry have raised concerns regarding the processes to be used during Port State Control inspections, it will be interesting to see how the development of a practicable and universal method for use by PSC regimes progresses.

Agenda Item 5: Development of international measures for minimizing the transfer of invasive aquatic species through bio-fouling of ships

- 5. The ISAF has co-sponsored a submission (BLG 16/5) which covers this issue as it applies to recreational craft. I believe that the paper has wide support judging from the minimal comments raised since the 15th session of BLG. I will introduce the minor changes agreed when we met in Puerto Rico, as these were too late for inclusion in the BLG submission.
- 6. ISAF will naturally support his paper and the approval of the proposed draft guidance for MEPC ratification.

International Code for the Construction and Equipment of Ships carrying Dangerous Chemicals in Bulk

The International Convention for the Control and Management of Ships Ballast Water and Sediments, 2004

International Regulations Commission – November 2012

Agenda Item 6: Development of international code of safety for ships using gases or other low flashpoint fuels

7. The Sub-Committee will receive the report of an Intersessional Correspondence Group which has been working on the proposed Code.

Item: 3(a)(i)

- 8. The Sub-Committee will continue to discuss the development of the code, with a Working Group almost certain to be established to carry out the work at this session. There is a great deal of development to be done, in particular with regard to the location of the fuel tanks in relation to the accommodation block. The Code scope includes all low flashpoint fuels, though it is expected that concentration for first detailed development will be on methane/LNG expanding to other fuels in the future.
- 9. This is worth following with a view to understanding how it might impact on construction and structure codes such as the European Recreational Craft Directive and the Technical Requirements for Inland Waterway Vessels.

Agenda Item 7: Development of revised International gas-carrying ships code (IGC) Code

Agenda Item 8: Review of relevant non-mandatory instruments as a consequence of the amended MARPOL Annex VI and the NOx Technical Code

10. There are two significant issues to be considered under this Agenda Item.

11. Fuel Sampling.

- a. MEPC 62 noted that although the sampling of fuel supplied to ships is adequately addressed, there was no particular provision to sample the fuel actually being used on board. The Committee instructed BLG to develop appropriate guidelines for a sampling procedure to enable effective control and enforcement of liquid fuel oil being used on board.
- b. <u>NORWAY</u> has submitted (BLG 16/8/2) a suggestion as to sampling at the service tank and <u>UK</u> has submitted comments on this, suggesting that sampling closer to the point of use may be more appropriate.

It should be noted that the European Commission is likely to incorporate the outcome of IMO deliberations on this issue into the revision of the EU Sulphur Directive (Directive EC). This might impact the recreational sector.

12. Replacement of Engines.

- a. The Sub-Committee will also consider the approaching deadline for introduction of Tier III engines within Emission Control Areas. In particular, it will receive the report of two Intersessional Correspondence Groups, one dealing with the availability of relevant technology to achieve the introduction date (2016) and the second dealing with replacement of engines post the introduction date.
- b. The latter examines the potential problems and has suggested that Tier III engines should be fitted as replacements post 2016, though it acknowledges that this might not be possible in some cases of difficulty in doing so. The Intersessional Correspondence Group has discussed what constitutes 'difficult' and the Working Group to be established at this session will continue these discussions.

ISAF will monitor the Working Group to understand what circumstances might be taken as falling into the definition of 'difficult' and how this might affect us.

International Regulations Commission – November 2012

Agenda Item 9: Development of a code for the transport and handling of limited amounts of hazardous and noxious liquid substances in bulk in offshore support vessels

Item: 3(a)(i)

Agenda Item 10: Consideration of amendment to SOLAS to mandate enclosed space entry and rescue drills

Agenda Item 11: Consideration of International Association of Classification Societies (IACS) unified interpretations

- 13. There are three areas for consideration as IACS UIs.
 - Linings for cargo tanks carrying acids
 - Secondary means of venting cargo tanks
 - Use of sludge oil when warming incinerators

There is no impact on our sector.

Agenda Item 12: Casualty analysis

14. There are no papers submitted under this Agenda Item at the time of writing.

Agenda Item 13: Biennial agenda and provisional agenda for next session

Agenda Item 14: Election of Chairman and Vice-Chairman

Agenda Item 15: Any other business

- 15. Several papers have been submitted to this session of the Sub-Committee on the subject of Black Carbon as a result of the agreement at MEPC 62 to establish a work plan for the Sub-Committee for consideration of the impact on the Arctic of emissions of Black Carbon from international shipping.
- 16. While all papers have been submitted under this Agenda Item, to complete the work plan agreed, with a report required to MEPC 65 is, to all intents and purposes, a new Unplanned Output. Either a separate new Unplanned Output will be needed or, more likely; this is another issue which will be considered under the current Agenda Item 8 (Review of relevant non-mandatory instruments as a consequence of the amended MARPOL Annex VI).
- 17. This is an important issue, in particular the significant effect on the environment and human health issues and it will be interesting to see how work progresses towards identifying a suitable and effective solution, including the use of abatement technology. It is also worth noting that the EU Commission seeks to take a unilateral lead on reducing all emissions without waiting for international agreements to be made.

Agenda Item 16 (Report to the Committees)