

Updated U.S. Coast Guard extension policy for ballast water treatment systems

On 6 March 2017, the U.S. Coast Guard (USCG) revised its extension policy for the implementation of ballast water treatment systems. Now that systems with USCG type approval are available, the extensions granted will be fewer and more limited. This has implications both for vessels with Alternate Management Systems (AMS) and for vessels that have not yet installed a treatment system

What has changed in the USCG extension policy?

Previously established USCG compliance dates will remain valid. New extension requests will be affected as follows:

• Fewer extensions will be granted

The later your vessel's compliance date, the less likely it is that a new extension will be considered by the USCG. Only limited extensions will be granted to vessels with compliance dates in the coming years. For vessels with compliance dates of 1 January 2021 or later, no extensions are likely.

• Dry docking schedules will not be considered

The extension expiry date will not be aligned with the dry docking schedule for renewing your vessel's IOPP certificate. Once your extension has expired, it will no longer be valid. This means you may need an additional dry docking to install a type-approved ballast water treatment system.

Vessel owners carry the burden of proof

To be eligible for an extension, you must demonstrate that no suitable system with USCG type approval can be installed by the compliance date.

- If a type-approved system is available but cannot be installed in time, you must provide a detailed installation plan. The maximum extension time in this case will be 18 months.
- If a suitable type-approved system is not currently available, you must still provide a strategy and timeline for compliance. The maximum extension time in this case will be 30 months.

What do the changes mean if you have an AMS?

- If you have an AMS installed, it will remain in compliance until the date stated on its certificate. This is usually five years after your vessel's compliance date.
- New AMS extension requests will be denied. You must install a type-approved treatment system or perform ballast water exchange after the AMS expiry date.

What do the changes mean if you have not installed a treatment system?

- If your vessel's compliance date is later than 2020, you cannot expect an extension. You should take steps now to ensure you will be in compliance at that time.
- If you do apply for an extension, you must submit a detailed plan for installation and compliance. Your application may be denied, or you may be granted only a short extension. While the number of type-approved systems is limited, you are expected to make engineering and operational accommodations to adapt them to your vessel.
- If engineering and operational accommodations are insufficient to make a type-approved system work for your vessel, you must still show how you intend to comply in the future. You are expected to work closely with system manufacturers to meet your vessel's needs.
- If you are not granted an extension and have not installed a type-approved system or AMS, you will need to perform ballast water exchange from your compliance date.

Information

Reminder: Ballast water exchange requirements from September 2017

The IMO Ballast Water Management (BWM) Convention has been ratified and will enter into force on 8 September 2017. From this date, all newbuilds will need to have ballast water treatment systems installed at delivery. While existing vessels will have longer to install treatment systems, they will need to perform ballast water exchange until they do.

No ballast water treatment system = ballast water exchange

If your vessel does not have a ballast water treatment system installed, you will need to perform ballast water exchange beginning on 8 September 2017. This is required by Regulation B-4 of the BWM Convention. You must perform the procedure at least 200 nautical miles from land and in waters at least 200 metres in depth, achieving a 95% volumetric exchange in accordance with Regulation D-1.

The only way to avoid performing ballast water exchange is to install a type-approved ballast water treatment system.

Ballast water exchange is an interim measure

Ballast water exchange is a temporary solution with risks for your vessel and limited biological efficiency. In the coming years, it will be phased out in favour of ballast water treatment.

According to Regulation B-3 of the BWM Convention, your existing vessel must have a ballast water treatment system retrofitted by its first IOPP renewal survey after 8 September 2017. The system needs to be type approved in accordance with Regulation D-2.

After your vessel's IOPP survey, ballast water exchange will no longer keep you in compliance.

You must have a Ballast Water Management Plan

By 8 September 2017, your vessel will also need a Ballast Water Management Plan, regardless of your compliance method. This will ensure that you can meet the reporting requirements of Port State Authorities.

The plan is a comprehensive document comprising rules, procedures, crew responsibilities, ballast water exchange locations, sampling requirements and more. Full details can be found in the IMO G4 guideline.

Without a Ballast Water Management plan, you risk operational delays and possible fines if you cannot prove compliance.

If you plan on discharging ballast in United States waters, there are important updates to U.S. Coast Guard policy that you should be aware of. See reverse side.