



IMO PPR 9 Meeting Summary

April 20, 2022

The 9th session of the IMO’s Sub-Committee on Pollution Prevention and Response (PPR 9) was held 4-8 April 2022 online. Liberia participated in the plenary and the following working groups (WGs):

	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 Sewage Treatment Plants and Marine Plastic Litter from Ships

CHEMICALS

Under this agenda item, the routine updates of chemical substances were examined for release as MEPC.2 circulars on *Provisional Categorization of Liquid Substances in Accordance with MARPOL Annex II and the IBC Code and to provide carriage guidance for substances which have not yet been fully categorized and reflected in the IBC Code*. The update included:

- The evaluation of pure or technically pure products and mixtures as a whole, including the evaluation of "Palm oil mill effluent oil" as a replacement for the generic entry for "Palm oil mill effluent (POME) technical oil";
- Evaluation of chemical substances; and
- Evaluation of cleaning additives.

PPR 9 endorsed all actions recommended by the 27th meeting of the Working Group on the Evaluation of Safety and Pollution Hazards of Chemicals (ESPH 27) and release of MEPC.2/Circ.27.

PPR 9 noted the continued discussion on the status of former oil-based Annex II cargoes, which were previously categorized as Annex I.

HNS CONVENTION

The IMO was working on the response manual for

hazardous and noxious substances (HNS).

PPR 9 considered information on the development of the Marine HNS Response Manual. The main objective of the Manual is to provide operational guidance to first responders and decision-makers on marine incidents involving HNS.

PPR 9 invited interested parties to submit their proposal to PPR 10.

BIO-SECURITY

Viable organisms

Ballast treatment standards accept the removal of the reproduction capacity of the aquatic organism as kill.

PPR 7 agreed to the draft text for the revision of the *Guidance on methodologies that may be used for enumerating viable organisms for type approval of ballast water management systems*, and agreed to keep this text in abeyance.

As no document was submitted to PPR 9, PPR 9 decided to conclude this matter based on past discussions and completed revision to BWM.2/Circ.61 on *Guidance on methodologies that may be used for enumerating viable organisms for type approval of ballast water management systems*.

The revised text addresses analytical methods for enumerating organisms in the 10 to 50 µm size class by adding FDA/CMFDA + Motility and MPN Dilution Culture +

Motility.

Revision of guidelines associated with the AFS Convention as a consequence of the introduction of controls on cybutryne

The IMO revised the AFS Convention for including cybutryne in the prohibited substance for entry into force on 1 January 2023 by resolution MEPC.331(76).

In this connection, PPR 7 had recommended MEPC 75 to continue work to address amendments to the Guidelines for sampling, survey and certification, and inspection of anti-fouling systems on ships.

PPR 9 agreed on

- 2022 Guidelines for brief sampling of anti-fouling systems on ships;
- 2022 Guidelines for inspection of anti-fouling systems on ships; and
- 2022 Guidelines for survey and certification of anti-fouling systems on ships.

The 2022 guidelines address:

- Maximum level (1,000 mg cybutryne per kg of dry paint);
- Tolerance Range (250 mg cybutryne per kg of dry paint (25%)); and
- Sampling and analysis.

PPR 9 sent the draft inspection guidelines to the 8th meeting of the IMO Sub-Committee on Implementation of IMO Instrument (III 8) to update the PSC guidelines. In this regard, PPR 9 confirmed that the issuance date of the revised certificate is not necessarily linked with dry-docking.

PPR 9 concluded that there was no need for an update to the list of materials for the Inventory of Hazardous Materials under the Hong Kong Convention to include cybutryne but note that there may be a need to consider amending the *2015 Guidelines for the development of the Inventory of Hazardous Materials* (resolution MEPC.269(68)).

Biofouling

The issue that received the most attention was that of inspection intervals and associated risk assessments to determine them. Several delegations expressed concerns with regard to inspection intervals proposed in the Correspondence Group (CG), which in their views, were too frequent.

Another highlighted issue was the consideration of proactive and reactive cleaning along with related capture rates.

The CG will continue working on the subject.

BWM Convention – Certificate

PPR 9 agreed with the following unified interpretations, which will be circulated as BWM.2/Circ.66/Rev.3 following approval by 78th session of the Marine Environment Protection Committee (MEPC 78) scheduled for June 2022:

- One-off exemption: to refer to BWM.2/Circ.52/Rev.1;
- Compliance through other measures: to refer to regulation A-4 in the certificate;
- BWMS plus other measures: mark compliance D-2 standard; and
- Other approaches: For a ship which has employed an "other approach", the Ballast Water Management Plan should describe it and should be checked during the surveys.

Verification of ballast water compliance monitoring devices

Indicative analyses are relatively quick and typically less precise. 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.

The WG reviewed the outcome of the CG that prepared an updated draft protocol for verification of ballast water compliance monitoring devices. The result of the discussion at PPR 9 will be reported to PPR 10.

AIR POLLUTION

Black carbon

The IMO has been addressing black carbon under "Air Pollution" since MEPC 58 (2008). PPR 9 reviewed submissions to MEPC 76 and MEPC 77 in addition to submissions to PPR 9.

In general, PPR 9 agreed on the goal-based recommendatory measures, which will be the basis of the discussion at the CG.

On technical points, the following were expressed:

- While three measurement methods are currently agreed upon, different threshold values would be needed for different measurement methods;
- Feasibility of the PM filter was questioned, in particular, soot accumulation and maintenance;
- An observer reminded the need for differentiating new and existing ships;
- Another observer reminded the WG that the current engine group/family concept is for NOx emission;

- A Member State pointed out that the engine load/speed was a relevant factor; and
- The standardization organization was working on fuel characteristics (paraffinic and aromatic nature of marine fuels).

The CG will address:

- Recommendatory goal-based control measures;
- Data on the recommended measurement methods; and
- Further consider regulating or otherwise directly controlling black carbon emissions.

Gasification systems

Gasification is a method for disposing of garbage onboard.

An updated proposal was presented proposes for the Standard specification/Guidelines for thermal waste treatment devices and associated amendments to regulation 16 of MARPOL Annex VI.

PPR 9 tasked the air pollution CG to further develop the text.

Discharge water from exhaust gas cleaning systems (EGCS)

At MEPC 74 (2019), the IMO Members proposed a study, following the decision at MEPC 73 that any air pollution prevention measure should not risk the marine environment.

Draft guidelines for risk and impact assessments of the discharge water from the exhaust gas cleaning system

The final text includes a wide and strict assessment procedure. Further strengthening made by the working group (WG) were:

- Introduction of precautionary measures;
- Adding cumulative effects; and
- Impact of hazardous substance on sediments effecting dredging operations.

Draft Guidance for acceptance of discharge water and residue at the port reception facility

The Guidance meant to be the exchange of the above prohibition, i.e., if the discharge water is kept in a holding tank, that should be handled by a reception facility together with residue.

Discharge ban as MARPOL regulation and database

While PPR reviewed the draft MARPOL regulation requiring notification to the IMO in setting up the EGCS discharge restriction, the need for the regulation was not conclusive.

With regard to the establishment of the database,

opinions were diverged, including

- cost implication for maintaining the database;
- contents and location of the database and in the GISIS module.

The IMO Secretariat was tasked to explore possible ways of including the report of notifications on local and regional restrictions in the existing MARPOL Annex VI module.

This work, together with the future MARPOL regulation, will be kept on hold. The discussion will resume at PPR 11 or a later meeting.

Multiple engine operational profiles (Multiple EOP)

To optimize engine performance and fuel consumption, electronically controlled engines may use different sets of engine operation parameters (fuel injection, inlet and exhaust valve operation, charge air, exhaust bypass/wastegate or exhaust after-treatment controls and auxiliary control devices) depending on its revolution and load. However, concerns are expressed that allowing such a flexible setting could be used to escape from the NOx certification which was done based on a particular engine revolution and engine load (so called “test cycles”).

Discussions at PPR were:

- Off-cycle assessment: to ensure there would not be an emission peak outside of the prescribed measurement points; and
- Selection of test cycle: The NOx technical code prescribes test methods (cycle) depending on the purpose (usage) of marine engines. However, the use of engines was not so simple (main propulsion vs diesel engines used for generator) today, e.g., Integrated electric propulsion systems.

PPR 9 focused on TOR of CG owing to the time constraints. PPR 9 agreed that CG should address both the multiple engine operation profile and the engine test cycle.

Biofuels

PPR 9 agreed on a proposed unified interpretation for acceptance of the use of biofuel, if there is any change to its NOx critical components or settings/operating values outside those as given by that engine’s approved Technical File:

- to cap the fuel mixture up to 30% mixture; and
- for fuel mixture more than 30%, not to exceed 10% NOx emission increase measured by simplified onboard measurement.

If there is no change to its NOx critical components or settings/operating values, the above condition does not apply.

NOx Technical Code – Engine family

There was a proposed interpretation of “engine family” for engines fitted with SCR. It states that if the number of engine cylinders is different, that engine cannot be considered in the same family unless clear evidence is provided.

PPR 9 agree with the interpretation, which differentiates the engine family from the engine group.

Volatile Organic Compound (VOC) emissions

The ninth meeting of the Intersessional Working Group on Reduction of GHG Emissions from Ships (ISWG-GHG 9) addressed VOC the issue and invited MEPC 77 to consider the matter further. MEPC 77 decided to instruct the PPR Sub-Committee to investigate how the reduction of VOC emissions could be further addressed under its agenda item on "Any other business".

There were several submissions on this issue, however due to time constraints PPR 9 sent all relevant documents to the CG.

New output proposal to revise the 2017 SCR Guidelines, as amended

A group of Member States proposed a revision of *the 2017 Guidelines addressing additional aspects of the NOX Technical Code 2008 with regard to particular requirements related to marine diesel engines fitted with Selective Catalytic Reduction (SCR) systems* (resolution MEPC.291(71) as amended by resolution MEPC.313(74)) (the 2017 SCR Guidelines, as amended) to improve their clarity and enable a uniform implementation.

PPR 9 agreed to recommend MEPC 78 to approve a new output, which will trigger various technical discussions, including tolerance of sensors.

In this regard, PPR 9 noted an information document describing proven alternative ways to detect the deterioration rate of SCR performance and agreed to take this paper into consideration when start working on the review of the 2017 SCR guidelines.

OIL POLLUTION

HFO ban in the Arctic

MEPC 76 adopted the prohibition of the use and the carriage of the 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 cargoes.

The CG completed 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, and submitted the outcome to PPR 8.

PPR 8 sent the guidelines to the relevant technical sub-committees to review navigation and communication, fuel tank protection and training, drill and familiarization.

PPR 9 noted the discrepancy of the diagram on fuel tank arrangements. A Member State advised PPR 9 that they would submit the revised diagram to PPR 10.

PPR 9 noted that NCSR 9 is scheduled for July 2022, therefore requested MSC to postpone this work item to 2023.

Machinery space bilge

At MEPC 77, a Member State proposed that the 15 ppm bilge alarm should have the function to send a light and sound alarm and stop overboard discharge of oily water when sample water has been lost.

The Member State further clarified at the PPR 9 that the aims to improve the function of 15 ppm bilge alarm.

All delegations who spoke stressed that the proper functioning of pollution prevention equipment was critical to ensuring the protection of the marine environment and PPR 9 concluded that the work would require a new work programme.

RECEPTION FACILITY

Similar to what was done for remote island nations, the regional arrangements are proposed in Arctic waters.

Following the proposal by a group of Member States, PPR 9 developed draft amendments to MARPOL Annexes I, II, IV, V and VI to allow the obligations to provide adequate port reception facilities in the Arctic to be met through regional arrangements and proposes amendments to *the 2012 Guidelines for the development of a regional reception facility plan* (resolution MEPC.221(63)) for approval by MEPC 78 and subsequent adoption by MEPC 79.

The proposed amendments to the guidelines include “Ports in Arctic waters subject to closure during winter months or to substantial seasonal operational limitations due to ice conditions may result in challenges to establishing and managing PRFs in such areas.”

In this regard, the IMO Secretariat noted the past omission of the Record book which will also be submitted to MEPC 78 as a correction.

SEWAGE TREATMENT

MEPC 74 instructed the PPR Sub-Committee:

- To include a 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; and
- To further consider including associated templates or guidelines in relation to sewage record-keeping and sewage management plan.

PPR 9 reviewed the report of the correspondence group, which consists of draft amendments to MARPOL Annex IV, and draft amendments to *the 2012 Guideline on type approval (TA Guidelines), and - Annex 3 – newly developed (associated) draft guidelines on implementation of Annex IV for sewage treatment plants (STP performance Guidelines)*.

The following are the major issue addressed during PPR 9:

- Inclusion of comminuting and disinfecting systems (CDS) in the work, not to be used as an escape clause. However, the scope of application to existing ships that replaces its sewage treatment plant with CDS is not clear; and
- Introduction of “threshold” based on the number of personnel on board.

The work will continue by the CG, which include the port reception facility.

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).

Garbage record book

PPR 9 developed the draft amendment to MARPOL to expand the requirement of the Garbage Record Book to ships of less than 400 gross tonnage but not less than 100 gross tonnage, for approval by MEPC 78 and subsequent adoption by MEPC 79.

PPR 9 instructed the IMO Secretariat to prepare a list of guidelines that would require consequential amendments due to the draft amendments to MARPOL Annex V regarding the Garbage Record Book.

Plastic pellets

MEPC 77 tasked PPR 9 to consider the submission paper

informing the Committee about the largest acute plastic pollution event to have ever happened when the MV X-Press Pearl sunk and 11,000 tonnes of plastic pellets were released into the sea, off the shore of Colombo, Sri Lanka.

At PPR 9, opinions were divided between

- Those who emphasized the environmental impact caused by the plastic pellet (noodles, powder etc.); and
- Those who stress the elimination of the root cause (i.e. container loss).

The CG will continue to work on this subject.

Fishing gear

Opinions were divided between voluntary guidelines or goal-based mandatory measures under MARPOL Annex V.

Recognizing the divergent views on the potential regulatory options and on the feasibility of making marking of fishing gear mandatory, as well as the need for clarity on high-level policy in order to progress its future work in an effective manner, PPR 9 invited MEPC 78 to provide further advice on possible regulatory options.

The CG will continue its work on reporting mechanisms, the modalities and the information to be reported to Administrations and IMO to facilitate and enhance reporting of the loss or discharge of fishing gear.

IMPACTS OF THE SITUATION IN THE BLACK SEA AND THE SEA OF AZOV

At the opening of the meeting, Ukraine expressed concerns over incidents of marine pollution and seafarer injuries, including a casualty, as a result of the ongoing aggression by the Russian Federation against Ukraine. Subsequently, many delegations raised concerns about the impact of the situation in the Black Sea and the Sea of Azov on shipping and seafarers and marine environment, consistent with the decisions of the thirty-fifth extraordinary session of the IMO Council.

FURTHER INFORMATION

For further information please contact: imo@liscr.com

PROVISIONAL LIST OF DRAFT RESOLUTIONS AND CIRCULARS

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- Draft revised Guidance on methodologies that may be used for enumerating viable organisms for type approval of ballast water management systems, for dissemination as BWM.2/Circ.61/Rev.1
- Draft 2022 Guidelines for brief sampling of anti-fouling systems on ships
- Draft 2022 Guidelines for inspection of anti-fouling systems on ships
- Draft 2022 Guidelines for survey and certification of anti-fouling systems on ships
- Draft MEPC circular on the 2022 Guidelines for risk and impact assessments of the discharge water from exhaust gas cleaning systems
- Draft MEPC circular on the 2022 Guidance regarding the delivery of EGCS residues and stored discharge water to port reception facilities
- Draft amendments to MARPOL Annexes I, II, IV, V and VI on Regional Arrangements for Port Reception Facilities in the Arctic
- Draft amendments to the *2012 Guidelines for the Development of a Regional Reception Facility Plan* (resolution MEPC.221(63)),
- Draft amendments to MARPOL Annex V to make the Garbage Record book mandatory also for ships of 100 gross tonnage and above and less than 400 gross tonnage
- Draft amendment to the unified interpretation of paragraph 4.4.6.1 of the NO_x Technical Code 2008, for inclusion in a revision of MEPC.1/Circ.895 (i.e. MEPC.1/Circ.895/Rev.1)
- Draft unified interpretation of regulation 18.3 of MARPOL Annex VI, with regard to the use of biofuels, for inclusion in a further revision of MEPC.1/Circ.795
- Draft unified interpretation of appendix I to the BWM Convention (Form of International Ballast Water Management Certificate), for inclusion in a further revision of BWM.2/Circ.66