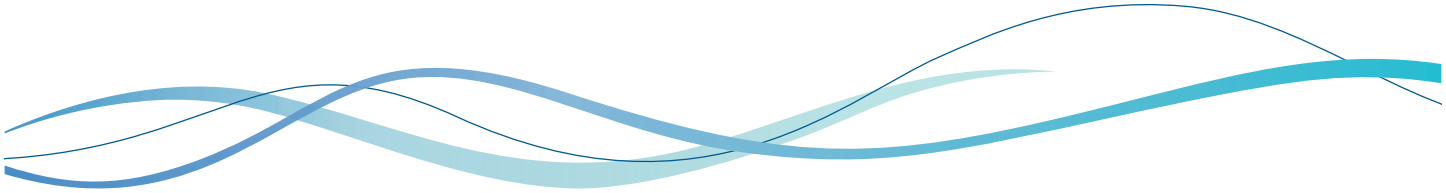
Technical eNewsletter

USCG requirements to fouling maintenance in the ballast water management plan



The revised US Coast Guard (USCG) regulations on ballast water management entered into force 21 June 2012. A specific ballast water management (BWM) plan is required for each vessel and shall include inter alia; procedures for detailed fouling maintenance. This newsletter describes what is required and some practical advice on how this can be fulfilled by the shipowner.

Reference is made to USCG Regulation 33 CFR Part 151:

33 CFR §151.2050 (e) and (f)

(e) Rinse anchors and anchor chains when the anchor is retrieved to remove organisms and sediments at their places of origin.

(f) Remove fouling organisms from the vessel's hull, piping, and tanks on a regular basis and dispose of any removed substances in accordance with local, State and Federal regulations.

33 CFR §151.2050 (g)

Maintain a ballast water management (BWM) plan that has been developed specifically for the vessel and that will allow those responsible for the plan's implementation to understand and follow the vessel's BWM strategy and comply with the requirements of this subpart. The plan must include:

(1) …

(2) …

(3) Detailed fouling maintenance and sediment removal procedures

BALLAST WATER MANAGEMENT PLAN

To maintain a ballast water management plan is required in (g). The BWM plan is not required to be approved by the USCG. However some coastal states like Norway and Brazil requires such plans to be approved by a recognised organisation (e.g. DNV). When the Ballast Water Management Convention enters into force, the BWM plan shall be approved by the Administration.

BIOFOULING

Biofouling means the accumulation of aquatic organisms such as micro-organisms, plants, and animals on surfaces and structures immersed in or exposed to the aquatic environment. Biofouling can include microfouling (microscopic organisms including bacteria and diatoms and the slimy substances that they produce) and macrofouling (e.g. barnacles, tubeworms, or fronds of algae).

Biofouling management is not required by the Ballast Water Management Convention. However, it is generally acknowledged that invasive aquatic species attached to a ship's anchor and hull can often be as damaging to local ecosystems as those species transported in the ballast water.

CALIFORNIA REQUIREMENTS

The State of California has recently published the final draft on regulations addressing biofouling management for vessels operating in California waters. The regulations are expected to enter into force 1 January 2013 and then apply to vessels as of 1 January 2014 (after first dry docking). The proposed regulations include requirements for a biofouling management plan and a biofouling record book, in addition to specific requirements in relation to how clean the vessel must be prior to arriving at any port in the State of California.

BIOFOULING MANAGEMENT PLAN

IMO has issued MEPC.207(62) dated 15 July 2011 entitled *2011 Guidelines for the control and management of ship's biofouling to minimize the transfer of invasive aquatic species.* States are encouraged to implement the guidelines to the maximum extent possible.

The requirements in USCG 33 CFR §151.2050 (g) is seen as US approach to implement biofouling requirements. USCG has also indicated that carrying a Biofouling Management Plan in accordance with the guidelines in MEPC.207(62) is one way of fulfilling the requirements in USCG paragraph (g). However USCG does not require an approved Biofouling Management Plan, it requires the ship to adequately address biofouling management in its shipboard procedures. USCG requires "how" to be documented in the BWM Plan.

MEPC.207(62) gives the following guidelines on what a Biofouling Management Plan should include:

- Ship specific procedures.
- Description of the operating profile.
- Details of the anti-foiling systems and operational treatments used.
- Mapping of hull locations susceptible to biofouling.
- Schedule of planned inspections, repairs, maintenance and renewal of anti-fouling systems.
- Procedures for the disposal of biological waste generated by treatment or cleaning processes (by the crew).
- A Biofouling Record Book, wherein details of all inspections and biofouling management measures undertaken on the ship are recorded.

A Biofouling Management Plan does not need to be approved by USCG but DNV may review such plans to verify compliance with MEPC.207(62). DNV is currently developing a guidance template for a Biofouling Management Plan, which may be received upon request in the near future.

DNV RECOMMENDS

For ships trading to US ports, DNV has the following recommendations.

- A ship specific ballast water management (BWM) plan should be on board.
- The BWM plan should include procedures for biofouling maintenance, including procedures for the rinsing of anchors and anchor chains, or a reference to a separate ship specific Biofouling Management Plan.
- The biofouling procedures should preferably follow the guidelines in MEPC.207(62).
- A ship specific Biofouling Management Plan in accordance with MEPC.207(62) is objective evidence of biofouling maintenance.

DNV recommends that shipowners establish a Biofouling Management Plan for each ship in accordance with MEPC.207(62), and include a reference to this plan in the ballast water management plan.

DNV technical eNewsletter, dated 19 April 2012, New US ballast water management requirements

USCG BWM page

USCG Regulation 33 CFR Part 151

California – Marine Invasive Species Program

MEPC.207(62)

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