

Proposal from Fleet Management Limited
to amend MARPOL Annex I

Purpose

1. The purpose of this paper is to seek members' views on the proposed amendment to MARPOL Annex I relevant to the integrated bilge water treatment system (IBTS) from Fleet Management Limited.

Background

2. HKMSIN No. 33/2008¹ informed that IMO issued a circular MEPC.1/Circ.642 "2008 Revised Guidelines for systems for handling oily wastes in machinery spaces of ships incorporating Guidance notes for an integrated bilge water treatment system (IBTS)" (2008 Guidelines). The 2008 Guidelines were regarded as guidance in achieving an efficient and effective system for the handling of oily water and oily residues. Concerned parties were recommended to take note of the 2008 Revised Guidelines and the Guidance notes for the IBTS and act appropriately.

Development of the 2008 Guidelines in IMO

3. The 54th session of the IMO Sub-Committee on Ship Design and Equipment (DE54 - 25 to 29 October 2010) reviewed the 2008 Guidelines, including measures to promote the IBTS to be adopted by IMO for new ships. It was generally supported the promotion of IBTS, in particular for new ships and of certain size. However, it also noted some difficulties in implementing IBTS for existing ships. Due to limited time, the draft amendments to the revised Guidelines could not be completed and would be continued with a view to finalize at DE 55 (21 to 25 March 2011).

¹ <http://www.mardep.gov.hk/en/msnote/pdf/msin0833.pdf>
<http://www.mardep.gov.hk/en/msnote/pdf/msin0833anx.pdf>

Proposal from Fleet Management Limited

4. Fleet Management Limited, in their email of 10/28/2010 12:54 as attached in the Appendix of this document, is of the view that the present regulations of MARPOL do not provide sufficient support means of suitable equipment to deal with the oily bilge water and oil sludge disposal, causing heavy workload burdens to the ship staff. They proposed that:

- (i) IBTS should be made mandatory for all ships (new and existing).
- (ii) Amendments to the requirements of MARPOL Annex I:- to introduce designated Soot Drain tank and Evaporation tank, to increase the Sludge tank capacity, and to amend the Bilge tank capacity.

Action of the Members

5. In view of the comment of DE54 on the difficulties in implementing IBTS for existing ships and the development of the issue in the IMO, members are invited to advise your views on the proposal in paragraph 4 above if there is a need for this Administration to submit a document as proposed by Fleet Management Limited to IMO for discussions.

Marine Department
Multi-lateral Policy Division
11 November 2010

Encl.