

SUB-COMMITTEE ON POLLUTION  
PREVENTION AND RESPONSE  
11th session  
Agenda item 5

PPR 11/5/8  
29 December 2023  
Original: ENGLISH  
Pre-session public release:

## DEVELOPMENT OF GUIDANCE ON MATTERS RELATING TO IN-WATER CLEANING

Comments on documents PPR 11/5, PPR 11/5/1 and PPR 11/5/3

Submitted by BEMA

### SUMMARY

*Executive summary:* This document provides comments on documents PPR 11/5, PPR 11/5/1 and PPR 11/5/3 as well as technical information to support development on guidance relating to in-water cleaning.

*Strategic direction, if applicable:* 1

*Output:* 1.21

*Action to be taken:* Paragraph 11

*Related documents:* MEPC 80/17; PPR 10/18; PPR 11/5, PPR 11/5/1, PPR 11/5/3, PPR 11/INF.8 and resolution MEPC.378(80)

### Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.5) and provides comments on documents PPR 11/5 (ICS and BIMCO), PPR 11/5/1 (Norway) and PPR 11/5/3 (Brazil).

### Background

2 Paragraph 5.47 of the report of PPR 10 (PPR 10/18) invited interested Member States and international organizations to submit relevant information on best practices for biofouling inspections and cleaning actions to the Organization. Following adoption of the *2023 Guidelines for the control and management of ships' biofouling to minimize the transfer of invasive aquatic species* (2023 Biofouling Guidelines, resolution MEPC.378(80)), MEPC 80 agreed to change the title of output 1.21 to "Development of guidance on matters relating to in-water cleaning" with the target completion year of 2025.

3 Several interested Member States and international organizations have submitted documents to this session, including PPR 11/5 and PPR 11/5/1, which suggest best practices for cleaning actions and the development of test protocols for the approval of in-water cleaning solutions. Several of the proposals refer to and utilize two independently developed industry standards as a basis.

### **Discussion**

4 The 2023 Biofouling Guidelines state that "an additional benefit of good biofouling management can be a reduction in emissions to air from ships, owing to lower fuel demand in operation as a result of a clean hull" (paragraph 4.3). In order to achieve this objective, hulls should be cleaned frequently to remove microfouling, maintaining a hull cleanliness level below FL1. Some in-water cleaning (IWC) suppliers, including members of BEMA, accomplish this by installing equipment permanently on board the ship and conduct IWC using fully autonomous or remote, semi-autonomous technologies while the ship is at a lay berth, at anchorage, sitting idle or while the ship is under way.

5 Many of the suggested methodologies for assessing the performance of hull cleaning operations outlined in the submitted documents indicate that the assessments will be carried out by divers or that photographs will be taken by divers to document the "before and after" cleanliness of the hull (PPR 11/5, annex, Operational Procedures item .1, and PPR 11/5/1, annex, figure 3.2). This is impractical when the cleaning operations are undertaken outside of a port area and where access to the ship by a diver may be difficult to achieve.

6 In document PPR 11/5/3, Brazil correctly notes that diving operations present risks for human safety. They therefore recommend that the use of diver-less inspections and IWC technologies be encouraged and developed to reduce the risks of these activities to safeguard human life (PPR 11/5/3, paragraph 11).

7 Industry guidelines developed outside of the context of the Sub-Committee are developed by a selected working group of experts and may not necessarily include all relevant stakeholders to the process, particularly those stakeholders with access to the latest technological developments in the field.

8 Document PPR 11/INF.8 (ISO) further notes that the International Organization for Standardization (ISO), an independent body made up of industry experts from all areas of the industry, is working on the development of a standard for conducting hull cleaning and inspections under ISO 6319 and that this standard is scheduled to be published in January 2026.

### **Conclusion**

9 Based on the experience of BEMA members and the technologies they have developed, any IWC guidance developed should take into consideration the latest innovations available in hull cleaning technology.

10 BEMA and its members suggest that, if sufficient time is allowed for the development and publication of ISO 6319, this can provide the base guidance for development of IMO's guidance on matters relating to IWC in accordance with output 1.21. In this way, the guidance can accurately reflect the current state of IWC technology available on the market at the time of publication.

**Action requested of the Sub-Committee**

11 The Sub-Committee is invited to consider the comments contained in this document and take action as appropriate.

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