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## Ballastwater Equipment Manufacturers' Association

# **The Time for Compliance is Approaching**

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21 September 2018

Friends in the Shipping Industry;

The past few months have been busy, rewarding, challenging, validating, and most importantly productive in the formation of the Ballastwater Equipment Manufacturers' Association (BEMA). Since our formation in April, 2018 through today, we have signed up nearly forty members. These members represent all regions of the world, all types of treatment technologies, and all of the different stakeholder companies in the ballast water treatment market. The cooperation and trust that has existed from our first formative meeting in February has only grown and BEMA is now truly able to call ourselves the voice of our industry.

With that voice, we want to speak to you today to remind each of you that the compliance dates are rapidly approaching. Not simply the compliance dates for those vessels that trade in U.S. waters, but also the dates for vessels flying the flags of any of the seventy-six countries signatory to the Convention, or any vessel trading in one of those countries. And while the U.S. Coast Guard has historically been generous in issuing extensions to their compliance dates, that leniency is coming to an end. Perhaps more importantly, there is no mechanism in place for extensions to be issued for the Ballast Water Management Convention.

Two years ago I was at the SMM Trade Show in Hamburg, Germany when the word came out of IMO that the Convention was ratified. Two years later, the situation has not changed from that date: compliance dates have been set for one year from now. Under the Convention, each ship to which the Convention applies, must meet the ballast water discharge standard (D-2) at their first IOPP renewal after September 8, 2019. If vessels choose to do that survey earlier, they need to comply at that earlier date. There is no room for leniency, there is no room for extension.

As an industry, we stand ready to help you through this time. We have trumpeted the challenges of installing and operating a ballast water management system (BWMS) for nearly fourteen years at conferences, trade shows, in the press, and on any stage that will have us. I myself have given over twenty presentations on the timeline required for a retrofit and I have never contended that it would take less than one year for an optimal installation. We have always cautioned that your IOPP renewal survey and your drydocking surveys may not coincide. This deadline difference may mean, in order to install your BWMS during a scheduled drydocking, you will need to install it before your actual compliance date. There is significant benefit in this plan as you then have time to ensure your BWMS is working to your satisfaction before your regulatory compliance date.

Have there been issues with the early designs of BWMS? Absolutely. Can a BWMS be difficult to operate? Yes. Will a BWMS affect the normal, pre-ballast water treatment operations of your vessels? Definitely. All of these questions have led many of you to delay this decision until the last possible minute in order to optimize your best chance for success. While we understand that thought process, we want to caution you that it is already the last possible minute.

September 8, 2019 is a very short time away. Between now and then, you will contend with a myriad of regulatory changes and disruptive events that impact your business. Between the sulphur cap on fuels, cyberchallenges, and shifts in global trade, you will be tasked with a number of challenges this year. Do not forget about ballast water treatment. Start your process now. If you have not installed a system on one of your ships, you absolutely need to now so you can learn how the system really works, how the company really performs, and what your crew needs to know before compliance is mandatory. There is a time to learn, but that time is not when ballast water is treated with the same stigma as oily bilge water.

BEMA stands ready to assist you in this time with neutral, non-commercial technical advice on ballast water treatment. In the coming months you can look to this website for technical information, best practices, and suggestions for maximizing the efficiency of your retrofit installation. If there are questions you have, please reach out to us directly at [Info@BWEMA.org](mailto:Info@BWEMA.org) and we will do our best to meet your needs. We are preparing to embark on the most ambitious attempt to improve the environmental performance of vessels in a generation. It will take each of us, working together, to accomplish this goal with efficiency.

We have been here, ready to serve. Remember, though, that you have your part in this endeavour and you need to begin to make those difficult decisions. The famous American philosopher, Benjamin Franklin, is attributed with saying that "Failing to plan is planning to fail." As an industry, we have done a lot to plan to succeed. Now it is time for the shipping community to do the same.



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