

Real Ballast Facts Bulletin

Issue #3, 04 February 2021

Stay in touch with BEMA!

- Visit our website www.BWEMA.org
- Follow the #BallastGeeks on Twitter for the latest ballast water scuttlebutt, news, and regulatory updates [@BEMAAssociation](https://twitter.com/BEMAAssociation) Follow our LinkedIn Page: [Official BEMA LinkedIn Page](#)
- For any questions, ask the BEMA External Affairs Committee at external-affairs@bwema.org

Pulse of the Industry

2020 COVID-19 Impacts on Marine Sector and Supporting Seafarers

The biggest story of 2020 was definitely the COVID pandemic and the universal impacts that were felt from this disruption to all of our lives. Nowhere was that felt more than in the shipping industry, where the pandemic affected seafarers, shipping, management, cargoes, and all levels of the maritime supply chain.

The ability of the shipping industry to continue uninterrupted to transport food, energy and medical supplies across continents played a critical role in addressing the pandemic. BIMCO, has launched a campaign to raise awareness about the crucial role of shipping to the global economy. This is a time where the shipping industry has learned that sometimes survival is about cooperation, not competition.

[“Ships make the world Go”](#) by BIMCO 2021



[#ShipsMakeTheWorldGo](#)

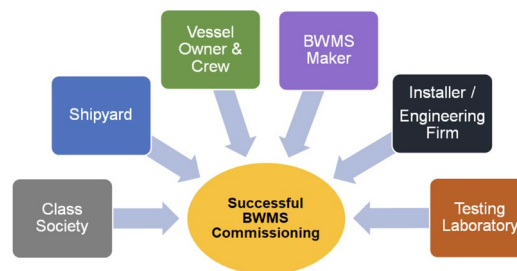
In a similar vein, BEMA members banded together to offer assistance to each other throughout the pandemic to make sure that critical equipment and systems were maintained and operated despite travel restrictions and shutdowns. BEMA Members working in partnership with each other allowed BEMA to demonstrate the value of cooperation through the Association and how pooling resources is critical during this time of uncertainty and fear.

As news of vaccines begin to drive a feeling of hope around the industry, all of us #BallastGeeks hope that this bulletin finds you and your teams safely getting back to the business of protecting the world's oceans from the spread of aquatic invasive species. It may have been a time of isolation and video meetings, but we have been very busy at BEMA and we hope this letter shows you just exactly what we have been up to!

BEMA Updates & News

- ★ BEMA is pleased to welcome two new members to the Board of Directors – Mr. Matt Granitto (Charter Member DeNora) and Mr. Christopher Todd (Charter Member Hyde Marine). Both Matt and Christopher stepped up to support BEMA when two Board positions became open and BEMA is fortunate to have these industry experts join the Leadership Team. Thank you to both of them, as well as to De Nora and Hyde Marine for being dedicated and engaged Charter Members.
- ★ BEMA is anticipating its application review from the IMO to achieve Non-Governmental Organization (NGO) Consultative Status within 2021.
- ★ The BEMA Technical Committee (TC) released a second series of Industry Guidance to Support Practical Implementation of Ballast Water Convention following *Exchange of Components*. This time the topic is *Ballast Water Commissioning Testing*. The Guidance includes a Regulatory Overview, summary of Interested Stakeholders & Relationships, training considerations, selecting a testing laboratory, a thorough root cause analysis on a non-compliance commissioning testing result and steps to be taken if commissioning can't be completed. Industry Guidance is Available on BEMA Website [BEMA 2020 Ballast water commissioning testing Industry Guidance to Support Practical Implementation](#)

Interested Stakeholders & Relationships



- ★ The BEMA External Affairs Committee (EAC) formed an ad hoc Subcommittee to gather input from Members and to formulate BEMA's comments on the proposed US Environmental Protection Agency (EPA) Vessel Incidental Discharge Act (VIDA) regulations. The Subcommittee was a forum for BEMA Members to discuss technical comments on the EPA proposed VIDA regulations thus allowing the formulation of BEMA's positions and/or comments on the EPA VIDA proposal. [BEMA's Official submission to EPA](#) was made on November 24th 2020.
- ★ The Frequently Asked Questions (FAQ's) section of the BEMA website is awaiting your Question! BEMA has introduced a form where anyone can [ask BEMA a question](#), and posted FAQ's on the [BEMA website](#). This is your chance to ask BEMA any question that is related to ballast water - so fire away!

Before submitting your question, please check the [FAQ document](#) on the *Resources* section of the BEMA website - the *#BallastGeeks* may have already answered it! The FAQ's will be updated on a quarterly basis based on the questions received.

BEMA during COVID time

We remained engaged, focused and committed to our Members and Mission. Two quick examples include:

- BEMA proudly served as a source of technical information requested by stakeholders, including the IMO, about COVID-19 business impacts to the ballast water treatment industry. This demonstrated that BEMA is building a trusted reputation, and better yet – the data showed that Our industry has responded exceptionally well to the challenges presented by COVID-19.
- BEMA was able to supply the US EPA with substantive type approval testing data that supported their development of the new regulations under the Vessel Incidental Discharge Act (VIDA), and BEMA followed up by submitting technical comments on the proposed regulations.

OCTOBER 28, 2020 left behind

In a year of important dates, October 28th 2020 may have been the most important one for our industry. That's because that was the date that the regulations transitioned to the new Resolution MEPC.300 (72). Under this resolution, all BWMS installations completed on or after 28th Oct 2020 shall comply with the Resolution MEPC.279(70) or MEPC.300(72). For retrofitting ships, "installed" means the contractual date of delivery of the BWMS to the ship. In the absence of such a date, the word "installed" means the actual date of delivery of the ballast water management system to the ship. The reference for this definition is provided in BWM.2/Circ.66 Rev 1. Although a list of the full number of systems that have achieved certification under MEPC.300(72) or MEPC.279(70) has not been pulled together, BEMA is excited that our Charter members were all fully prepared for this change in the regulation and we had no loss of members due to this important regulatory upgrade.

Regulation Updates & Info

★ IMO UPDATES

The seventy-fifth session of the Marine Environment Protection Committee (MEPC 75), originally scheduled to be held from 30 March to 3 April 2020, was postponed due to the COVID-19 pandemic (Circular Letter No.4213/Add.1) and was finally held remotely from 16 to 20 November 2020 (Circular Letter No.3985/Rev.1)

MEPC 75 adopted amendments to the International Convention for the Control and Management of Ships' Ballast Water and Sediments, 2004 (BWM Convention), concerning commissioning testing of ballast water management systems and the form of the International Ballast Water Management Certificate. The amendments are expected to enter into force on 1 June 2022. The Committee also approved revised Guidance for the commissioning testing of ballast water management systems ([BWM.2/Circ.70/Rev.1](#)); and revised Guidance on ballast water sampling and analysis for trial use in accordance with the BWM Convention and Guidelines (G2) ([BWM.2/Circ.42/Rev.2](#)).

IMO is requested to record the approvals of ballast water management systems and circulate their list once a year. Resolution MEPC.228(65), on the other hand, requests the Administrations approving a ballast water management system in accordance with the Guidelines (G8) to provide relevant information regarding the Type Approval Certificate to the Organization for circulation to the interested parties.

IMO updates are listed here: [IMO BWM Technologies](#)

★ EPA UPDATES

On October 26th the Vessel Incidental Discharge Standards Act (VIDA) was made available for a public comment period of only 30 days. VIDA is intended to bring the discharges to U.S. waters from commercial vessels, including ballast, under the governance of a single law. Currently vessels are forced to comply with different federal and state laws. For ballast water, VIDA will bring together the U.S. Federal ballast discharge laws and the Vessel General Permit as well as individual state laws. VIDA was passed from the U.S. Congress and signed into law in 2018. EPA has now published the VIDA "Standards of Performance". After public comments are considered the Standards of Performance will be finalized and the USCG will have two years to write what will become the final "implementing regulations".

BEMA as well as several members submitted some of the 180+ comments. These and all VIDA related information and supporting documents can be viewed on the Federal Register's VIDA Docket [Page: Federal Register : Vessel Incidental Discharge National Standards of Performance](#).

In the meantime, current laws governing discharges, including the existing EPA VGP and U.S. ballast water laws all apply unchanged.

EPA has published an updated FAQ's: [Commercial Vessel Discharge Standards: Frequently Asked Questions | Vessels, Marinas and Ports | US EPA](#).

★ USCG UPDATES

USCG released a Guidance on testing alternate components for Type Approved Ballast Water Management System (BWMS) under 16714 [CG-OES Policy Letter No. 03](#) Issued on October 14, 2020. It provides guidance on the testing and validation of alternate components requested to be used with a type-approved BWMS in accordance with 46 CFR 162.060-16.

BEMA Member Spotlight

Each publication of the Real Ballast Facts Bulletin will shine a spotlight on a featured BEMA Charter or Associate Member. We're proud of our Members and are happy to share their accomplishments, industry developments and latest news. In this issue the spotlight is on [ARGO NAVIS ENGINEERS!](#)

WHY COOPERATION HELPS OVERCOME COVID HURDLES by Argo Navis



“ARGO NAVIS, together with our network of Companies (those with whom we cooperate through synergy and subcontracting) offers a full spectrum of BWTS retrofit services, from 3D Laser Scanning and Engineering Studies to Installation and Commissioning.

Everyone in this network had to adapt to the new reality brought on by the COVID pandemic. The transition to COVID era operations was facilitated by the fact that ARGO NAVIS had carefully cultivated its network beforehand. As the world ground to a halt, our partners assisted us with solutions and helped us create new opportunities for cooperation.

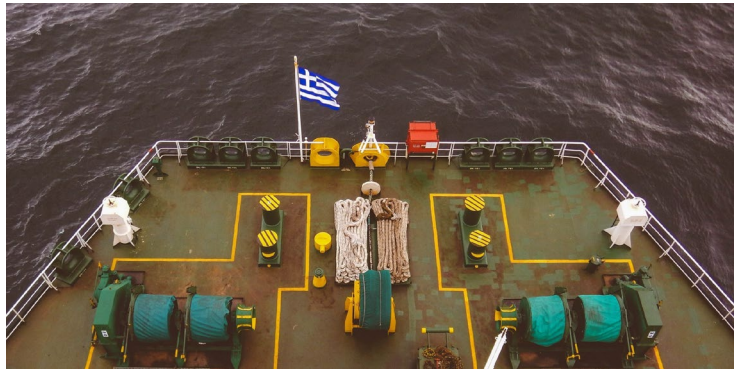
For instance, our 3D Laser Scanning requests often come at a moment's notice, but our local scanning team's ability to travel is now hampered by PCR test lag times and stringent COVID policies adopted by countries, port authorities - even airlines. Thus we now outsource a large percentage of our scanning to partners abroad that are able to overcome logistical hurdles while at the same time maintaining our high standard of quality.

Lockdown and remote working coincided with our transition towards project management of a greater number of outsourced projects. Though our local engineering teams are still busy creating the technical drawings and specifications for Ballast Water Treatment System and Exhaust Gas Cleaning System retrofits, we allocated additional project management duties to our more senior staff. Whether at the office, or working remotely, they now oversee Engineering Studies created by the ARGO NAVIS network of partners.

Our installation, service and commissioning engineers faced the usual COVID restrictions with their attendances. Unless quarantine exceptions can be acquired, long quarantines await engineers for all their visits to foreign countries. The COVID bottleneck has also restricted the availability of specialized teams and hampered timely delivery of spare parts, making our engineers' work that more difficult at the drydock. Often, there are very serious problems faced by the ship managers themselves too - and this in turn indirectly affects their own network of partners (including our own).

Regardless of who is working to find solutions, whether it's ARGO NAVIS and our partners or the ship managers themselves, the best way to deal with the new COVID reality is to develop a robust network that will allow industry stakeholders to subcontract projects that are difficult to complete from a singular point.

Every new era comes with its own set of challenges and this one is no exception. Instead of moving away from one another, stakeholder cooperation should be significantly expanded, allowing everyone to adapt and successfully support this new reality.” - ARGO NAVIS ENGINEERS



#shippingindustry #3dls #ballastwater #egcs #imo2020

BEMA Events and Meetings

Clearly, COVID-19 has resulted in many industry events being cancelled, postponed, or moved to a virtual platform. We very much look forward to the opportunity to connect with colleagues in person again soon!

Below is a roundup of events and meetings that BEMA has participated in:

CMA (Informa/Virtual event; 12-14 October 2020)

BEMA Launched during CMA Shipping the Industry Guidance to Support Practical Implementation of Ballast water Commissioning Testing on courtesy of Charter member, Ecochlor. Virtual participants have the chance to listen and watch the Guidance in the Digital Oak Boardroom and better understand Commissioning Testing. Thank you Secretary General for the Narration!



International BWT Forum - Shanghai Event (18th November)

BEMA Board Member Mr Kechao Lu , Technical Manager of Headway had the chance to present our Organization in China during the International BWT Forum. Participants showed great interest in BEMA and its work, while everyone agreed that BEMA, as an NGO, will play a positive role in the development of the ballast water industry. Even under the influence of the current pandemic, the forum was a success with almost 100 attendants. Thank you FILTERSAFE for providing a presentation spot in the event!



Informa Virtual BWT London + Miami (8 - 9 th December)

BEMA Technical Committee Chair Dr Stelios Kyriacou, Chief Technology Officer of ERMA FIRST had the chance to present our Commissioning Presentation during the Informa Virtual BWT Forum. Thank you EnviroManagement, Inc. for providing a presentation spot in the event!

Forthcoming events

To be announced

Follow us on social media to get the latest information, news and #RealBallastFacts directly from the #Ballastgeeks themselves. Twitter: [@BEMAssociation](https://twitter.com/BEMAssociation) LinkedIn: [Official BEMA LinkedIn Page](#)

Experience Building Phase: International Council for the Exploration of the Sea (ICES)

BEMA aims to support the IMO's Experience Building Phase (EBP) and serve as a resource for sharing experiences from stakeholders as implementation of global ballast water management regulations continues.

In this issue, we are pleased to present the [International Council for the Exploration of the Sea \(ICES\)](#) as a case study.

The International Council for the Exploration of the Sea (ICES) is an intergovernmental marine science organization, meeting societal needs for impartial evidence on the state and sustainable use of our seas and oceans.

Part of the ICES group of experts is the Working Group on Ballast and Other Ship Vectors (WGBOSV) that provides scientific support to the development of international measures aimed at reducing the risk of transporting non-native species via shipping activities.

As a joint working group, WGBOSV follows and supports the work of its three umbrella organizations: the Intergovernmental Oceanographic Commission of UNESCO (IOC), the International Maritime Organization (IMO), and ICES.

The latest WGBOSV report is the *Protocol for the Verification of Ballast Water Compliance Monitoring Devices*. This protocol has been developed to serve as a standardized framework for the verification testing of CMDs. A summary of the Report is listed below and the [full document is available here](#).

Concerns regarding the impact of non-native species due to their transport and release in ship ballast water have resulted in agreements and regulatory requirements being implemented around the world (e.g. International Maritime Organization [IMO] Ballast Water Management Convention [BWMC], 2004; US Coast Guard [USCG], 2012; California State Lands Commission [CSLC], 2018). Consequently, effective and reliable monitoring for ship compliance with ballast water discharge standards is now critical to achieve the regulatory goal of minimizing the risk of invasive species introductions. A variety of ballast water compliance monitoring devices (CMDs) have been developed. This includes various sensors, instruments, kits, methods, and assays that have been designed to assess compliance with ballast water discharge standards and requirements. Additionally, several novel CMD approaches are also currently being explored. However, rigorous, transparent and standardized verification testing is needed for these devices to be adopted and implemented globally, by multiple administrations (i.e. countries, governments, or jurisdictions) to enforce compliance monitoring. Otherwise, CMD performance, data quality, and uncertainties will remain unknown.
