**PPR 7 (17 - 21 February 2020)**

The 7th session of the Sub-Committee on Pollution Prevention and Response (PPR 7) was held at IMO Headquarters from 17 to 21 February 2020.

***Evaluation of products and trade-name mixtures according to the new MARPOL Annex IIdischarge requirements***

From 1 January 2021, the new MARPOL Annex II discharge requirement will apply to cargoresidues and tank washings of substances assigned to category Y that are persistent floaters with a viscosity equal to or greater than 50 mPas at 20ºC and/or with a melting point equal to or greater than 0ºC (Resolution MEPC.315(74)).

The products for which the new discharge requirements apply are assigned special requirement 16.2.7 in column "o" of chapter 17 to the IBC Code. It might be challenging to apply the criteria for a persistent floater as contained in the new regulation 1.23 of MARPOL Annex II to mixtures.

PPR 7 has request GESAMP/EHS for a recommended way forward when assessing mixtures against the above criteria, and advise whether the overall mixture should be assessed against the criteria, noting substances might separate when discharged to the sea, or whether mixtures should be assessed on a component level by applying a cut-off limit for the concentration of individual components that meet the criteria for the assignment of special requirement 16.2.7.

***Evaluation of products***

PPR 7 concurred with the evaluation of following products and their respective inclusion in List 3of the MEPC.2/Circular - SCAL16359A and CORR11413A.

***Evaluation of cleaning additives***

PPR 7 has agreed to the evaluation of cleaning additives. It is noted that MARPOL Annex II, regulation 13, Provisions on the control of discharge of Noxious Liquid Substances, imposes restrictions on the cleaning additives permitted for use in tank washing operations.

***Clarification on the implementation of products in List 1 of the MEPC.2/Circular***

PPR 7 agreed to a way forward with regard to the shipment of reassessed products in chapter 17 and 18 of the IBC Code listed in List 1 of the MEPC.2/Circular.

MEPC circular on Guidance on the implementation of provisional categorization of liquid substances in accordance with MARPOL Annex II and the IBC Code related to paraffin-like products was approved by MEPC 74 and issued as MEPC.1/Circ.886.

PPR 6 discussed a proposal to develop broader guidance regarding the application of the MEPC.2/Circular for products that had been reclassified and added to List 1 of the MEPC.2/Circular with revised carriage requirements.

The reassessed carriage requirements contained in the MEPC.2/Circular are more accurate than those in the IBC Code, as the products have been assessed using the most up to date GESAMP Hazard Profiles and the revised chapter 21 of the IBC Code. PPR 7 had for its consideration a draft MEPC circular on clarification on the implementation of products listed in List 1 of the MEPC.2/Circular and proposing a way forward in order to make use of the updated carriage requirements for products already listed in the IBC Code once they have been reassessed with validity for all countries and without an expiry date.

 PPR 7 agreed that to add a qualifier to the product name of the reassessed product in List 1 of the MEPC.2/Circular would be the best way forward in order to permit the shipment of reassessed chapter 17 and 18 products.

The addition of a qualifier would provide a clear distinction between the existing and the reassessed product and would not require the Certificate of Fitness to be reissued as the reassessed product could be included as a separate product in the addendum to the Certificate.

The decision to add a qualifier to reassessed chapter 17 and 18 products should be recorded in the draft amendments to PPR.1/Circ.7 and in the main body of the MEPC.2/Circular and that this approach can be applied for existing products that have been reassessed and listed for all countries without an expiry date from MEPC.2/Circ.26 and onwards.

***Review of products in lists 2 and 3 of the MEPC.2/Circ***

In the amendments to the IBC Code, all products in chapter 17 and 18 of the Code have been reassessed against the revised chapter 21 of the Code, the criteria for the new discharge requirements in MARPOL Annex II and the latest GESAMP Hazard Profiles for the products.

PPR 7 agreed that the products contained in Lists 2 and 3 of the MEPC.2/Circular should also be reassessed in the similar manner as the products contained in chapter 17 and 18 of the Code.

As a consequence, it agreed to the draft PPR circular on the review of products in Lists 2 and ofthe MEPC.2/Circular, for endorsement by MEPC 76.

PPR 7 also agreed to set an expiry date to all products in List 2 and 3 of MEPC.2/Circular in order to have all products reassessed by 31 December 2025.

Any product that has not been reassessed by the deadline will be deleted from the List and can no longer be shipped. Administration should request their manufacturers to review their products in order to assess whether any changes in the carriage requirements would be necessary, taking into account the revised chapter 21 to the IBC Code, the latest GESAMP Hazard Profile and the revised MARPOL Annex II requirements.

Thereafter the manufacturer should inform their Administration of the composition of their products and whether updated carriage requirements need to be assigned to the products or not.

The Administration should thereafter inform IMO as follows:

- products no longer shipped and can be deleted from the MEPC.2/Circular;

-for products assessed and where the carriage requirements would remain the same, a notification of the assessment would be sufficient; and

-for products assessed and where the carriage requirements would change, a submission with a PPR Data Reporting Form would be necessary.

There are approximately 430 products in Lists 2 and 3 of the MEPC.2/Circular that would need to be reassessed.

***Revised carriage requirements for methyl acrylate and methyl methacrylate***

PPR 7 had for its consideration comments (IACS) on the adoption of the IBC Code, and especially on the revised carriage requirements for "Methyl acrylate" and "Methyl methacrylate" where special requirements 16.6.1 and 16.6.2 have been omitted in column "o" of chapter 17 in the 2019 amendments to the IBC Code.

"Methyl acrylate" and "Methyl methacrylate" are liable to undergo polymerization under certain conditions and are therefore protected by additives in order to mitigate this tendency.

However, elevated temperatures could still initiate or speed up the polymerization process and since these products should not be exposed to excessive heat, special requirements 16.6.1 and 16.6.2 should be assigned to them.

PPR 7 decided:

- to issue a PPR.1/Circular with revised carriage requirements for "Methyl acrylate" and "Methyl methacrylate" which include special requirements 16.6.1 and 16.6.2 and to recommend that these carriage requirements are used in lieu of the carriage requirements contained in the 2019 amendments to the Code; when the next version consolidated version of the IBC Code is prepared, the omission could be rectified so that the carriage requirements could be correct;

-to include the revised carriage requirements in MEPC.2/Circ.26; the circular should be sent to MEPC 75 as an urgent matter.

***Revised guidance on ballast water sampling and analysis***

PPR 7 agreed to the draft text for the revision of the Guidance on ballast water sampling and analysis for trial use in accordance with the BWM Convention and Guidelines (G2), for submission to MEPC 76 for approval and dissemination as BWM.2/Circ.42/Rev.2.

MEPC 68 approved the 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.1), where available methods for indicative and detailed analysis of ballast water samples are listed.

The Guidelines for port State control under the BWM Convention (Resolution MEPC.252(67)), stipulate that "the indicative analysis should not unduly delay the operations, movement or departure of the ship.

At present, there are no commercially available indicative analysis methods for analyzing specifically the three indicator microbes on board in under 15 hours, which is incompatible with compliance execution. The current methods available for analyzing specifically Enterococci, Escherichia coli and Vibrio cholera require incubation time, highly qualified operators and analyses in land-based laboratories.

Second-generation Adenosine triphosphate (ATP) can be used as an alternative indicator for the indicative method to assess non-compliance with the D-2 standard performance standard in the Ballast Water Management Convention for all living bacteria, including the three indicator microbes within the framework of port State controls and/or checks at the commissioning of ballast water management systems.

PPR 7 agreed to include second-generation ATP as a general approach for measuring totalliving bacteria, including Enterococci, Escherichia coli and Vibrio cholera, to enable its use and its assessment for the testing period. PPR 7 also agreed to amendments to the BWM.2/Circ.42/Rev.1, concerning the text related to cultivation methods for the ≥50 µm and ≥10 to <50 µm size groups.

It has been updated to reflect current knowledge and ensure that BWM.2/Circ.42 is in line with BWM.2/Circ.61 relevant to enumeration of viable organisms in type approval testing. Also the table 4 of annex 1 to BWM.2/Circ.42/Rev.1 is amended.

***Revised guidance on methodologies that may be used for enumerating viable organisms***

PPR 7 agreed to the draft text for the revision of the Guidance on methodologies that may be used for enumerating viable organisms for type approval of ballast water management systems(BWM.2/Circ.61).

PPR 7 had for its consideration proposal to amend BWM.2/Circ.61, consisting in updating the existing method reference for the MPN+Motility.

After several years of testing BWMS using UV treatment, the industry has gained good experience with the culture method for determination of viable organisms in size class 10-50 μm (MPNmethod) resulting in a common methodology for MPN+Motility.

PPR 7 decided to keep the amendments agreed at this session in abeyance, for consolidation at PPR 8, with a view to approval at MEPC 77 and dissemination as BWM.2/Circ.61/Rev.1.

***Revision of the Guidelines for commissioning (BWM.2/Circ 70)***

PPR 7 agreed to the draft text for the revision of the Guidance for the commissioning testing of ballast water management systems, for submission to MEPC 75 for approval and dissemination as BWM.2/Circ.70/Rev.1.

MEPC 74 had invited submissions to this session concerning proposals on any necessary changes to the BWM.2/Circ.70 in light of the draft amendments to regulation E-1 of the BWM Convention.

PPR 7 agreed that the objective of commissioning testing was the verification of a successful installation of the BWMS and not of compliance with the D-2 standard.

It agreed on the definition of a successful test and amended the relevant text in the guidance, noting that addressing test failures was up to the Administration and outside the scope of the guidance, which was instead about how the tests should be conducted.

Microbes should not be included in the testing, while with regard to the two size classes defined in regulation D-2, namely ≥ 50 µm and ≥ 10 µm to < 50 µm, should both be included in the tests.

Such tests could be conducted under the supervision of recognized organizations operating on behalf of the Administration.

***Development of a standard for verification of ballast water compliance monitoring systems***

MEPC 74 had invited interested Member States and international organizations to submit concrete proposals for the development of a standard for verification of ballast water compliance monitoring systems to PPR 7.

So far, none of the indicative analysis methods in BWM.2/Circ.42/Rev.1 (or compliance monitoring systems employing those methods) have been validated using a universally accepted protocol with testing conducted by independent, third parties.

Until a verification protocol is adopted by IMO (or is otherwise universally accepted) and the analysis methods (or compliance monitoring systems employing those methods) are verified following the protocol, the methods inBWM.2/Circ.42/Rev.1 should be used to verify the biological efficacy of BWMS.

Due to time constraints, PPR 7 was not able to consider this matter.

***Amendment of Annex I to the AFS convention to include controls on cybutryne, andconsequential revision of relevant guidelines***

PPR 6 had agreed to the draft amendment to Annex 1 to the AFS Convention (Controls on antifouling systems) to include controls on cybutryne, for consideration by MEPC 74, with a view toapproval.

The Technical Group, established at PPR 6, developed the draft amendment to Annex 1of the AFS Convention, which includes control measures for AFS systems containing cybutryne, i.e. that ships either: (1) shall not bear cybutryne on their hullsor external parts or surfaces; or (2) shall bear a coating that forms a barrier to cybutryne leaching from the underlying non-compliant AFS, on or after 3 October 2026.

MEPC 74 referred the draft amendments to Annex 1 to the AFS Convention to PPR 7 for further consideration, including addressing the potential conflict between article 4(2) of the AFS Convention and the proposed amendments to Annex 1.

PPR 7 agreed to the draft amendment to Annex 1 to the AFS Convention to include controls on cybutryne, with a view to its finalization and approval by MEPC 75.

PPR 7 had extensive discussions on the schedule of the controls, including a consideration of the interpretation of article 4(2) of the AFS Convention, which addresses timing constraints for the retention of existing anti-fouling systems following the entry into force of relevant controls.

Major concern were expressed by Japan was the possible unavailability of sealer coats that could be applied without removing the existing anti-fouling system containing cybutryne.

The International Paint and Printing Ink Council (IPPIC) indicated that the existing sealer coatings for anti-fouling systems containing organotin could be effective for sealing cybutryne and other approaches for sealing cybutryne may also exist and be effective.

 Further consideration was required to ensure that the sealer product supplied would be effective at preventing cybutryne-emissions from the anti-fouling system.

PPR 7 decided that ships should not apply or re-apply anti-fouling systems containing cybutryne from 1 July 2022 and, with the exceptions and caveats outlined in the next two paragraphs, should remove or seal such anti-fouling systems either before 1 July 2027 or not later than 60 months following the last application of such an anti-fouling system prior to 1 July 2022, with the decision between these two options to be made by MEPC 75.

PPR 7 agreed that a fixed date would be preferable, as it would be simpler and would entail less administrative burden, but recognized that this may not be possible due to the provisions of article 4(2). Owing that it is a matter of interpretation, both options are kept in square brackets for consideration by MEPC 75.

***Form of AFS certificate***

PPR 7 agreed to the draft operative paragraphs with regard to issuance of the new International Anti-fouling System Certificate (IAFSC), with a view to their inclusion in the draft requisite Resolution adopting the amendments to the AFS Convention.

PPR 7 had for its consideration the following point, raised by IACS : in accordance with regulation 2(3) of Annex 4 to the AFS Convention, ships bearing an anti-fouling system containing cybutryne that was applied before the date of entry into force of the relevant controls would have to be issued with a new Certificate by the Administration not later than two years after entry into force of these controls.

Due to the simultaneous amendment of the form of the Certificate, ships not bearing anti-fouling systems containing cybutryne would also require new Certificates.

In this regard, PPR 7 recalled the agreement of the Committees, reflected in paragraph 3.1 of the Guidance on the timing ofreplacement of existing certificates by the certificates issued after the entry into force of amendments to certificates in IMO instruments (MSC-MEPC.5/Circ.6), that in cases where the ship does not have to comply with new requirements, the certificate (and its supplement, if any) is not re-issued until its expiry.

The IAFSC does not have an expiry date and remains valid as long as it is endorsed every time an anti-fouling coating is replaced.

***Issuance of the new International Anti-fouling System Certificate***

PPR 7 agreed to the draft amendments to Annex 4 (Surveys and certification requirements for anti-fouling systems) to the AFS Convention, including the model form of the International Antifouling System Certificate, for consideration by MEPC 75, with a view to approval.

***Review of the 2011 guidelines for the control and management of ships biofouling tominimize the transfer of invasive aquatic species (ResolutionMEPC.207(62))***

In 2011, MEPC adopted the 2011 Guidelines (ResolutionMEPC.207(62)), and, in 2012, MEPC approved Guidance for minimizing the transfer of invasive aquatic species as biofouling (hull fouling) for recreational craft (MEPC.1/Circ.792).

These Guidelines encouraged Member States to voluntarily implement practices that control and manage biofouling on commercial ships and recreational craft.

MEPC 72 agreed to review the 2011 Guidelines for the control and management of ships' biofouling to minimize the transfer of invasive aquatic species (Resolution MEPC.207(62)).

PPR 7 has taken note of the growing concern that these voluntary guidelines are not being broadly implemented and, therefore, are not reducing biofouling on ships and, in turn, not minimizing the potential risk of the introduction and spread of invasive aquatic species.

A broad range of impediments to the implementation of the Guidelines were identified, including port restrictions for underwater maintenance and cleaning operations; lack of availability of cleaning and maintenance facilities; lack of availability of equipment, tools or techniques; high cost; seasonality of navigation and voyage patterns, such as short voyages or if deviations are required.

With regard to in-water cleaning, PPR 7 agreed that, while its importance was already highlighted in the Guidelines, this could also be further enhanced. One element that was particularly highlighted was the need to develop consistent standards and protocols with regard to the efficacy and safety of in-water cleaning practices, whereas for the time being full implementation of the Guidelines is further slowed by the lack of In Water Cleaning facilities and low uptake of acceptable IWC practices around the world.

The main feasibility issue identified was the difficulty in inspecting and treating biofouling in niche areas.

It was discussed that there could be scope to enhance the Guidelines' provisions regarding the inspection of the condition of the hull.

It also raises a safety issue, as it can be difficult and dangerous to access niche areas in-water.The importance of biofouling management plans and record books is stressed.

Implementing biofouling management plans and record books can add to the already extensive administrative workload for ship staff, representing another impediment to implementation.

Finally, PPR 7 agreed to the identified key elements of the Biofouling Guidelines that require further attention and discussion, and the corresponding areas for potential revision of the Guidelines.

A correspondence group on the review of the Biofouling Guidelines is going to handle this topic.

***Reduction of the impact on the Arctic of black carbon emissions from internationalshipping***

Initial results of a Black Carbon measurement campaign (Finland and Germany) has demonstrated that the combustion of fuels with higher aromatic content emits higher concentrations of BC.

New hybrid fuels with 0.50% sulphur content used in the study contained a high proportion of aromatic compounds in a range of 70% to 95%, which resulted in increased BC emissions in a range of 10% to 85% compared to HFO and in a range of 67% to 145% (a factor of 2.45) compared to DMA.

A correspondence group should be established to work on this issue.

***Development of guidelines for on board sampling of fuel oil not in use by the ship***

 PPR7 agreed to the draft Guidelines for on board sampling of fuel oil intended to be used or carried for use on board a ship, with a view to approval by MEPC 75.

The sampling of in-use fuel oil is already covered by the Guidelines for onboard sampling for the verification of the sulphur content of fuel oil used on board ships (MEPC.1/Circ.864).

A revision to those Guidelines was considered and agreed at PPR 6 in order to bring them into line with the terminology of the amendments to regulation 14 of MARPOL Annex VI which were also considered and agreed at PPR 6.

At PPR 6 draft amendments to regulation 14 of MARPOL Annex VI covered the extension of the revised verification procedures under appendix VI of that Annex, to additionally cover in-use and onboard fuel oil samples.

The potential for verification of the sulphur content of fuel oil on board, which at the time of an inspection would not be in use, being seen as a necessary element in the enforcement of the carriage ban as given by the revised regulation 14.1 of MARPOL Annex VI. MEPC 74, following consideration of proposal from IMarEST of Guidelines for onboard sampling for the verification of the sulphur content of the fuel oil carried for use on board a ship, had forwarded the document to PPR 7 to further consider and prepare the new guidelines.

Two approaches are given: the first is an indirect option using a suitable installed pump, while the second provides for, subject to conditions, direct sampling from the tank in question.

The general understanding in the draft guidelines is that the sample should be representative of the fuel at the point at which it is taken but this sample will not necessarily be representative of the whole volume of the fuel carried.

***Standards for shipboard gasification of waste systems and associated amendments toregulation 16 of MARPOL Annex VI***

Due to time constrain, this topic was forwarded to PPR 8.

***Review of the 2015 Guidelines for exhaust gas cleaning systems (Resolution MEPC.259(68))***

PPR7 agreed to the draft 2020 EGCS Guidelines, as well as the proposal for a revised MEPC.1/Circ.883/Rev.1, with a view to adoption and approval by MEPC 75 respectively.

The 2020 EGCS Guidelines would supersede the 2015 EGCS Guidelines, and that the date on which the 2020 EGCS Guidelines would take effect, once adopted + 6 months.

The revised 2020 Guidelines would only apply to new installations fitted after a specific date, and existing EGCS approved in accordance with the 2015 Guidelines for exhaust gas cleaning systems (MEPC.259(68)) (2015 EGCS Guidelines) would not need to be approved again.

Modifications have been introduced on the following points:

- Definition of 12-hour period;

- Definition of PAH;

- Actions to take in case of unexpected non-compliant events due to equipment failure;

- Use of ultraviolet light for PAH measurement;

- Monitoring of turbidity;

- Water monitoring data recording;

- Appendix 3 on Discharge Water Data Collection;

- Onboard Monitoring Manual (OMM).

MEPC 74 had approved MEPC.1/Circ.883 on Guidance on indication of ongoing compliance in the case of the failure of a single monitoring instrument, and recommended actions to take if the exhaust gas cleaning system (EGCS) fails to meet the provisions of the 2015 EGCS Guidelines (Resolution MEPC.259(68)).

No development on this topic are no longer needed in the draft Guidelines. Following a review of the applicability of MEPC.1/Circ.883, PPR 7 agreed that the circular should be made applicable to the different versions of the EGCS Guidelines, including the 2020 EGCS Guidelines, once adopted.

Accordingly, PPR 7 has requested MEPC to issue a Rev.1 of MEPC.1/Circ.883 with an extended scope of application, and which should apply as of the date on which of the 2020 EGCS Guidelines took effect.

***Evaluation and harmonization of rules and guidance on the discharge of liquideffluents from EGCS into waters, including conditions and areas***

MEPC 74 approved, in principle, a new output on "Evaluation and harmonization of rules and guidance on the discharge of liquid effluents from EGCS into waters, including conditions and areas".

In addition, a GESAMP Task Team had been established to assess the available evidence relating to the environmental effects of discharge water from EGCSs.

A number of delegations expressed their concerns over the proliferation of local or regional measures that restrict the use of EGCS without sufficient scientific justification.

 Some other delegations stressed the potential combined effects and accumulation of pollutants in the EGCS discharge water, sediments and wildlife, in light of the increased number of installations of EGCS to comply with 2020 sulphur limit.

The establishment of local or regional rules without sufficient scientific justification are the major identified concerns, and developing measures that address these concerns should be the main output for this new agenda item.

PPR 7 agreed to the following draft revised scope of the output, with a view to approval by MEPC 75:

- Part 1-A Risk assessment;

- Part 1-B Impact assessment;

- Part 2 Delivery of EGCS residues;

- Part 3 Regulatory matters;

- Part 4 Database of substances.

***Development of amendments to MARPOL annex VI and the NOx technical code on theuse of multiple engine operational profiles for a marine diesel engine***

Due to time constraints, PPR 7 referred this issue to PPR 8.

***Development of measures to reduce risks of use and carriage of heavy fuel oil as fuelby ships in Arctic waters***

In April 2018, MEPC 72 noted that the proposal to ban the use and carriage for use as fuel of heavy fuel oil (HFO) by ships in Arctic waters, had received wide support.

The Committee referred to PPR the development of a definition of HFO, of Guidelines on mitigation measures to reduce risks and the development of a ban on HFO use and carriage for use as fuel by ships in Arctic waters.

***Draft guidelines on measures to reduce risks of use and carriage of heavy fuel oil as fuel by shipsin Arctic waters***

PPR 6 had established a Correspondence Group on Development of Guidelines on Measures to Reduce Risks of Use and Carriage of Heavy Fuel Oil as Fuel by Ships in Arctic Waters, and instructed it to develop draft guidelines accordingly.

These Guidelines on risk mitigation measures are intended to address the use, and carriage for use as fuel of heavy fuel oil (HFO) by ships in Arctic waters to reduce the probability of pollutionas well as minimize any adverse environmental impact caused by such HFO spills.

They include consideration of the structural characteristics of the ships, establishment of recommendatory shipping routes and precautionary areas (taking into account icebergs, ice stresses and ice drift), navigation in shallow and coastal waters in various ice conditions or with icebreaker assistance, and manning and training of crew.

Some of the recommended measures would represent a financial and administrative burden for the Arctic coastal States, flag States and operators, if implemented in full or to a certain extent.

It would be up to each party involved to consider the need or extent to which any of the proposed relevant measures could be enforced according to national or corporate environmental policies and practices.

PPR 7 has decided to re-establish a Correspondence Group to further develop the draft Guidelines on measures to reduce risks of use and carriage of heavy fuel oil as fuel by ships in Arctic waters.

***Impact assessments and proposals on development of a ban on HFO for use and carriage as fuelby ships in Arctic waters***

PPR 7 agreed to the draft amendments to MARPOL Annex I to incorporate a prohibition on the use and carriage for use as fuel of heavy fuel oil by ships in Arctic waters on or after 1 July 2024, for submission to MEPC 76 with a view to approval and subsequent circulation.

MEPC 72 instructed the PPR Sub-Committee to develop a ban on HFO for use and carriage as fuel by ships in Arctic waters. PPR 6 finalized the impact assessment methodology.

The methodology contained, inter alia, a step to develop factors that could either ameliorate adverse impacts of a ban or accommodate specific situations.

PPR 6 further invited interested parties, in particular Arctic States, to carry out impact assessment guided by, but not limited to, the above mentioned methodology and to present the submissions to PPR7.

The delegation of the Russian Federation expressed the view that a ban on HFO use as fuel in the Arctic, though introduced by a global mandatory instrument, would have impacts borne primarily by the Arctic States.

Subsequently, this delegation proposed that the introduction of such a ban should not take the form of uniform restrictive measures and must take into account the specificfactors and individual characteristics of each Arctic State. The amendment is a compromise text, which allows the development of the proposed ban to protect this unique ecosystem and its local and Indigenous communities while taking into consideration the concerns of economic impacts to affected areas.

This proposed text included waivers that would extend no later than 1 July 2029. Some delegations that spoke were in favour of excluding ships constructed in compliance with the provisions of regulation 12A of MARPOL Annex I or Part II-A, chapter 1, regulation 1.2.1 of the Polar Code from the ban on HFO indefinitely, as these ships were constructed to have extra protection around fuel tanks.

Other delegations were of the view that these ships should not be eligible for delayed implementation, as there are examples of both single-hulled and double hulled ships having incidents of spilled HFO as fuel and as cargo.

PPR 7 agreed on delaying the implementation by five years for ships constructed in compliance with regulation 12A of MARPOL Annex I or Part II-A, chapter 1, regulation 1.2.1 of the Polar Code.

It agreed also on text that allows an Arctic coastal State to temporarily waive the requirements of a ban until 1 July 2029 for ships flying its flag operating in waters subject to the sovereignty or jurisdiction of that Party.

PPR agreed that the best way to delineate the differing requirements between the Antarctic area and Arctic waters was to add regulation 43A concerning Arctic waters to chapter 9 of MARPOL Annex I, instead of amending regulation 43 of MARPOL Annex I.

***The IBTS Guidelines***

PPR 5 had agreed to develop a set of consolidated IBTS Guidelines (by amalgamating all relevant IBTS guidance and circulars into a single document) and consequential draft amendments to the IOPP Certificate (IOPPC) and the Oil Record Book (ORB).

PPR 6 had established a Correspondence Group on this topic. PPR 7 agreed to the draft 2020 Guidelines for systems for handling oily wastes in machinery spaces of ships incorporating guidance notes for an integrated bilge water treatment system (IBTS 2020 IBTS Guidelines) and the accompanying draft MEPC circular, for submission to MEPC 76, with a view to approval.

***Amendments to the IOPP Certificate and Oil Record Book***

During the consideration of the proposed amendments to appendix II (Form of IOPP Certificate and Supplements) of MARPOL Annex I, some delegations were of the view that, as there were only two methods explicitly provided in MARPOL Annex I for disposal of oily bilge water, namely passing through oil filtering equipment and discharge to reception facilities, the IOPPC Supplements should not be amended to list the options of incineration and evaporation of oily bilge water.

With regard to the acceptability of evaporation as a means of managing oily water, some delegations supported the deletion of evaporation from the IBTS Guidelines, considering the risks associated with forced evaporation that might result in oil mist or vapour in the atmosphere.

However, the majority of delegations that spoke supported the continued acceptance of evaporation as a means of disposal of oil residues in the sludge tank. Those delegations were of the view that the means of evaporation was currently allowed as referenced in MEPC.1/Circ.642 and MEPC.1/Circ.736/Rev.2, and evaporation occurred naturally on board ships on a daily basis.

PPR 7 decided to forward the draft amendments to MEPC 76 for further consideration about the aforementioned topic prior to subsequent adoption.

***Oil record Book guidance***

PPR 7 agreed to the draft revised Guidance for the recording of operations in the Oil Record Book Part I – machinery space operations and the companying draft MEPC circular, for submission to MEPC 76 for approval.

The Guidance is intended to facilitate compliance with MARPOL requirements on board ships by providing advice to crews on how to record the various operations in the Oil Record Book by using the correct codes and item numbers in order to ensure a more uniform port State control procedure.

***Revision of MARPOL Annex IV and associated guidelines to introduce provisions forrecord-keeping and measures to confirm the lifetime performance of sewage treatment plants***

MARPOL Annex IV applies to ships engaged in international voyages of 400 gross tonnage and above, or which are certified to carry more than 15 persons.

The Annex requires ships to be equipped with either an approved sewage treatment plant (STP), an approved sewage comminuting and disinfecting system or a sewage holding tank. The discharge of sewage into the sea is prohibited, except when the ship has in operation an approved STP.

Ships that have such an approved STP in operation can discharge the effluent according to regulations 11.1.2 and 11.3 ofMARPOL Annex IV without any restrictions when it comes to distance from land, speed, en route or discharge rate, except for "no-discharge" zone or port.

The only requirement applicable to the effluent discharged is that it shall not produce visible floating solids nor cause discolouration of the surrounding water.

Untreated sewage which is not comminuted or disinfected may be discharged at a distance of more than 12 nautical miles from the nearest land when the ship is en route and proceeding at not less than 4 knots.

If a sewage treatment plant (STP) has been installed on a ship, then this type of equipment shall be of a type approved by the Administration taking into account the standards and test methods developed by the Organization (regulations 9.1.1 and 9.2.1 of MARPOL Annex IV).

At MEPC 71, the Netherlands submitted a report on a sampling survey and providing the observation that most ships were discharging effluents that did not meet the requirements of the 2012 Guidelines on implementation of effluent standards and performance tests for sewage treatment plants (ResolutionMEPC.227(64)), despite using approved sewage treatment plants.

This was linked not only to unclear type approval processes, but also to lack of maintenance and lack of MARPOL Annex IV enforcement. According to the existing regulations, the performance of STP is tested ashore under simulated shipboard conditions and results must demonstrate that the system complies with the standards and test methods developed by the Organization in order for the equipment to be type-approved.

There is no requirement for subsequent onboard testing or commissioning testing in order to approve compliance after the installation on board a ship.

At the same time, in section 3 of both the 2012 Guidelines (ResolutionMEPC.227(64)) and the preceding guidelines (Resolution MEPC.159(55)), it is recognized that the performance of an STP may vary considerably when the system is tested ashore, compared to actual operating conditions after being installed on board a ship.

Many delegates were of the view that a robust type approval test with clear and unified testing requirements and conditions, a control mechanism of performance combined with regular monitoring together with regular maintenance, correct operation and use, and adequate enforcement procedures will ensure that the performance of the systems is satisfactory throughout their lifetime.

The updates of the 2012 Guidelines should focus on requirements relating the type approval test, performance tests and indicative monitoring and requirements on a commissioning test.

Sewage record book would align MARPOL Annex IV with other MARPOL Annexes addressing discharges. PPR7 agreed that work on this matter could be progressed intersessionaly through a correspondence group.

Given the large volume of work expected in developing the draft amendments to MARPOL AnnexIV and the 2012 Guidelines on implementation of effluent standards and performance tests forsewage treatment plants (Resolution MEPC.227(64)), the Correspondence Group may not be able to develop consequential guidance identified during the drafting of these amendments, and therefore decided to task the Correspondence Group to simply identify these consequential guidances for future development.

With regard to grey water treatment, PPR 7 agreed that addressing this was outside the scope of MARPOL Annex IV and the current output but noted that there was support for grey water to be considered at a future session.

***Amendment of MARPOL Annex V and the associated implementation Guidelines***

MEPC 73, in recognition of the urgency to address marine plastic litter from ships, adopted the Action Plan to address marine plastic litter from ships (Resolution MEPC.310(73)) (Action Plan).

PPR 7 had for its consideration proposal concerning measure 22 contained in the Action relating to the discharge or accidental loss of fishing gear data reporting to IMO.

The current reporting requirement (from fishing operator to the flag State and where appropriate, the coastal State) under regulation 10.6 of MARPOL Annex V is limited to fishing gear that is accidentally lost or discharged and poses a significant threat to the marine environment or navigation.

In addition, the data to be collected are left to the satisfaction of the Administrations (2017 Guideline for the implementation of MARPOL Annex V (Resolution MEPC.295(71), section 2.2).

There is no requirement for this data to be reported to IMO. There was support for the establishment of a correspondence group to carry out work intersessionaly on how to amend MARPOL Annex V and the 2017 Guidelines for the implementation of MARPOL Annex V (ResolutionMEPC.295(71)).

***MEPC circular on Provision of adequate facilities at ports and terminals for the reception ofplastic waste from ships***

PPR 7 agreed to the draft MEPC circular on Provision of adequate facilities at ports and terminals for the reception of plastic waste from ships, with a view to subsequent approval by MEPC76.

It reminds Member States of the requirement to provide adequate facilities at ports and terminals for the reception of garbage.

***Unified interpretation to provisions of IMO environment-related conventions***

 PPR 7 had for its consideration the following IACS Unified Interpretations (UIs) for the NOX Technical Code 2008 which it has approved:

- IACS UI MPC 33 Revision 2, regarding paragraph 2.2.4.1, concerning engines that undergo onboard certification and testing;

- IACS UI MPC 74 Revision 1, regarding paragraph 5.10.1, defining additional parameters, which are beyond those in section 1 of appendix 5 of the NOX Technical Code 2008, in order to get the "necessary data to fully define the engine performance and enable calculation of the gaseous emissions".

A new circular encompassing both UIs will revoke MEPC.1/Circ.865.

***Correspondence groups established by PPR7***

1. Correspondence group on the review of the biofouling guidelines.

Terms of reference:

- assess the effectiveness of the Guidelines in their current form as measures to minimize the risk of transferring invasive aquatic species from ships' biofouling, including assessment of the uptake and implementation of the Guidelines;

- review the Guidelines considering best practices, available technologies and techniques to practically control biofouling, and available research and development;

- develop recommendations for the Sub-Committee on how to address issues relating to the key elements of the Guidelines for revision, as appropriate, based on technical analysis and the review Guidance, to facilitate an increase in uptake and effectiveness of the Guidelines.

2.Correspondence Group on Development of Guidelines on Measures to Reduce Risks of Use and Carriage of Heavy fuel Oil as Fuel by Ships in Arctic Water.

Terms of reference:

-further develop the draft Guidelines on measures to reduce risks of use and carriage of heavy fuel oil as fuel by ships in Arctic waters.

3. Correspondence Group on Amendments to MARPOL Annex IV and associated Guidelines (seawage)

Terms of reference:

- develop, as appropriate, draft amendments to MARPOL Annex IV

- identify consequential guidance required when preparing the draft amendments to MARPOL Annex IV;

- develop draft amendments to associated guidelines.

4. Correspondence Group on Marine Plastic Litter from Ships

Terms of reference:

- consider how to amend MARPOL Annex V and the 2017 Guidelines for the implementation of MARPOL Annex V (Resolution MEPC.295(71)) to facilitate and enhance reporting of the accidental loss or discharge of fishing gear, as currently provided in regulation 10.6 of MARPOL Annex V, and consider the information to be reported to Administrations and the IMO, the reporting mechanisms and modalities.