



SUB-COMMITTEE ON BULK LIQUIDS
AND GASES
12th session
Agenda item 16

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ANY OTHER BUSINESS

Proposal for a BLG Circular on Provision of information relative to adherence to regulations 12 and 18 of MARPOL Annex II

**Submitted by the International Association of Independent Tanker Owners
(INTERTANKO)**

SUMMARY

Executive summary: INTERTANKO is proposing a BLG Circular that focuses on the continued practice by facilities of draining shore lines back to the vessel upon completion of NLS cargo operations. This continued practice violates regulations 12 and 18 of MARPOL Annex II

Action to be taken: Paragraph 3

Related documents: Chapter 4, regulation 12 of MARPOL Annex II and chapter 8, regulation 18 of MARPOL Annex II

1 Background

1.1 This document is submitted in accordance with the Guidelines on the organization and method of work contained in MSC-MEPC.1/Circ.1.

1.2 Chapter 8, regulation 18 of MARPOL addresses the issue of reception facilities and cargo unloading terminal arrangements. Paragraph 4 of this regulation clearly states that draining shore lines back to the vessel upon completion of cargo unloading operations is in direct violation of the new stripping requirements found in the 2007 Revisions to MARPOL Annex II:

“4 The Government of each Party to the Convention shall undertake to ensure that cargo unloading terminals shall provide arrangements to facilitate stripping of cargo tanks of ships unloading noxious liquid substances at these terminals. Cargo hoses and piping systems of the terminal, containing noxious liquid substances received from ships unloading these substances at the terminal, shall not be drained back to the ship.”

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1.3 MARPOL Annex II also contains revised stripping requirements. In addition to violating the above regulation, line clearing back to the ship also contradicts the stripping requirements contained in chapter 4, regulation 12 of MARPOL Annex II:

“Pumping, piping, unloading arrangements and slop tanks

1 Every ship constructed before 1 July 1986 shall be provided with a pumping and piping arrangement to ensure that each tank certified for the carriage of substances in Category X or Y does not retain a quantity of residue in excess of 300 litres in the tank and its associated piping and that each tank certified for the carriage of substances in Category Z does not retain a quantity of residue in excess of 900 litres in the tank and its associated piping. A performance test shall be carried out in accordance with appendix 5 of this Annex.

2 Every ship constructed on or after 1 July 1986 but before 1 January 2007 shall be provided with a pumping and piping arrangement to ensure that each tank certified for the carriage of substances in Category X or Y does not retain a quantity of residue in excess of 100 litres in the tank and its associated piping and that each tank certified for the carriage of substances in Category Z does not retain a quantity of residue in excess of 300 litres in the tank and its associated piping. A performance test shall be carried out in accordance with appendix 5 of this Annex.

3 Every ship constructed on or after 1 January 2007 shall be provided with a pumping and piping arrangement to ensure that each tank certified for the carriage of substances in Category X, Y or Z does not retain a quantity of residue in excess of 75 litres in the tank and its associated piping. A performance test shall be carried out in accordance with appendix 5 of this Annex.”

2 Discussion

2.1 It is important that the Sub-Committee be aware of the practice, which is in direct violation of the requirements found in the 2007 Revisions to MARPOL Annex II. Member States are encouraged to ensure regulations 12 and 18 are adhered to by all facilities transferring noxious liquid substances.

3 Action requested of the Sub-Committee

3.1 The Sub-Committee is invited to take appropriate action which may include the issuance of a BLG circular indicating that the practice of line clearing is a contravention of regulations 12 and 18. A draft of this circular is contained in the annex.

ANNEX

DRAFT BLG CIRCULAR

**PROVISION OF INFORMATION RELATIVE TO ADHERENCE TO
REGULATIONS 12 AND 18 OF MARPOL ANNEX II**

1 Attention is drawn to the requirements in MARPOL Annex II with regard to the issue of reception facilities and cargo unloading terminal arrangements.

2 Paragraph 4 of regulation 18 of MARPOL Annex II reads:

“4 The Government of each Party to the Convention shall undertake to ensure that cargo unloading terminals shall provide arrangements to facilitate stripping of cargo tanks of ships unloading noxious liquid substances at these terminals. Cargo hoses and piping systems of the terminal, containing noxious liquid substances received from ships unloading these substances at the terminal, shall not be drained back to the ship.”

3 Regulation 12 of MARPOL Annex II reads:

“1 Every ship constructed before 1 July 1986 shall be provided with a pumping and piping arrangement to ensure that each tank certified for the carriage of substances in Category X or Y does not retain a quantity of residue in excess of 300 litres in the tank and its associated piping and that each tank certified for the carriage of substances in Category Z does not retain a quantity of residue in excess of 900 litres in the tank and its associated piping. A performance test shall be carried out in accordance with appendix 5 of this Annex.

2 Every ship constructed on or after 1 July 1986 but before 1 January 2007 shall be provided with a pumping and piping arrangement to ensure that each tank certified for the carriage of substances in Category X or Y does not retain a quantity of residue in excess of 100 litres in the tank and its associated piping and that each tank certified for the carriage of substances in Category Z does not retain a quantity of residue in excess of 300 litres in the tank and its associated piping. A performance test shall be carried out in accordance with appendix 5 of this Annex.

3 Every ship constructed on or after 1 January 2007 shall be provided with a pumping and piping arrangement to ensure that each tank certified for the carriage of substances in Category X, Y or Z does not retain a quantity of residue in excess of 75 litres in the tank and its associated piping. A performance test shall be carried out in accordance with appendix 5 of this Annex.”

4 Any practice of draining shore lines back to the vessel upon completion of cargo operations contradicts the purpose of the new stripping requirements and is a violation of regulations 18 and 12 of MARPOL Annex II.

5 Member States are requested to bring this Circular to the notice of their respective terminals that transfer NLS under MARPOL Annex II.