

SUB-COMMITTEE ON POLLUTION
PREVENTION AND RESPONSE
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Agenda item 12

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**EVALUATION AND HARMONIZATION OF RULES AND GUIDANCE ON THE
DISCHARGE OF LIQUID EFFLUENTS FROM EGCS INTO WATERS,
INCLUDING CONDITIONS AND AREAS**

**Refining the title and scope of a new output on discharge of liquid effluents
from EGCS**

Submitted by FOEI, WWF and Pacific Environment*

SUMMARY

Executive summary: This document offers a view on the title and the scope of the output on "Evaluation and harmonization of rules and guidance on the discharge of liquid effluents from EGCS into water, including conditions and areas" which was included in the 2020-2021 biennial agenda of the PPR Sub-Committee and the provisional agenda for PPR 7, with a target completion year of 2021. The co-sponsors welcome the opportunity to provide constructive input.

*Strategic direction,
if applicable:* 1

Output: 1.23

Action to be taken: Paragraph 8

Related documents: PPR 6/INF.20; MEPC 74/14/1, MEPC 74/14/7, MEPC 74/14/8, MEPC 74/INF.10, MEPC 74/18 and PPR 7/INF.22

Introduction

1 MEPC 74 approved, in principle, a new output on "Evaluation and harmonization of rules and guidance on the discharge of liquid effluents from exhaust gas cleaning system (EGCS) into waters, including conditions and areas" in the 2020-2021 biennial agenda of the PPR Sub-Committee, with a target completion year of 2021. MEPC 74 directed PPR 7 to further consider relevant documents that had been submitted to MEPC 74, with a view to refining the title and the scope of the output and advising MEPC 75 accordingly (see MEPC 74/18, paragraph 14.11).

* Also supported by <https://www.stand.earth/>

Discharges from EGCS

2 Ships are already discharging liquid effluent from EGCS into waters, including those near shore and in ports, as well as within habitats for threatened and endangered species (see PPR 7/INF.22). Ships using open-loop EGCS or hybrid EGCS in open-loop mode continuously discharge warm, acidic washwater that contains carcinogenic substances such as polycyclic aromatic hydrocarbons (PAHs) and heavy metals, as well as sulphates, nitrates, and particulate matter. Ships that use closed-loop EGCS do not discharge washwater but do discharge highly concentrated bleed-off water, unless they are operated in zero discharge mode.

3 EGCS effluents pose an immediate, ongoing, and growing threat to aquatic ecosystems, wildlife, and humans. In light of the current climate and biodiversity crisis, including the recent recognition of the pressures placed on the ocean through deoxygenation and the vital need for healthy ocean ecosystems to act as global carbon sinks, a precautionary approach needs to be taken when considering the discharge of any further pollution into the sea.

4 As shown in document PPR 7/INF.22 (FOEI et al.), the International Council on Clean Transportation (ICCT) found that EGCS washwater discharges occur near shore and within critical habitats for threatened and endangered resident killer whale species that live off the coast of British Columbia, Canada.

5 Research submitted to MEPC 74 and PPR 6 suggests that the impact of EGCS effluent discharges on marine life and biogeochemical processes deserves further scientific investigations (MEPC 74/INF.10 and PPR 6/INF.20). Other submissions question the harm of EGCS effluent discharge, noting that it is diluted by seawater, contains pollutants in concentrations below the maximum allowed under IMO guidelines, and does not result in exceeding national water quality guidelines. This ignores their potential combined effects and ignores the accumulation of pollutants in the water, in sediments and in wildlife. The cumulative effects of concentrated vessel operations along shipping lanes, near shore, and in ports should not be ignored, especially because many more ships have installed or will install EGCS in response to the 0.50% m/m sulphur limit in 2020.

Title of the output

6 As conditions and areas for discharge of liquid effluents from EGCS have yet to be considered, proposed or designated, the current title of the output could be refined to better reflect the need to do this. The co-sponsors suggest the output title be changed to:

"Evaluation and harmonization of regulations and guidance on the discharge of liquid effluents from EGCS into waters, including if, when, or where discharges should be allowed"

Scope of the output

7 The co-sponsors are of the view that the scope of the output should consider, at minimum, the following elements:

- .1 distance from nearest land;
- .2 polar regions; and

.3 areas of cultural and ecological sensitivity and significance.

Action requested of the Sub-Committee

8 The Sub-Committee is invited to consider the proposed refinement to the title of the output in paragraph 6 and the proposed elements to be included in the scope of the output in paragraph 7.
