



# Venezuelan Register Of Shipping Ltd.

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## Circular Letter 005/2017

Date: 11.07.2017

Attn.: VRS Authorized Surveyors, Shipowners, Ship operator, Managing Companies, Masters

Subject: **IMO Ballast Water Management (BWM) Convention – New Implementation Dates Agreed for Installation of Ballast Water Treatment Systems**

The BWM Convention will enter into force on 8 September 2017. All applicable ships\* over 400gt are required to have Certification, confirming compliance with, as a minimum, the D-1 (i.e. ballast water exchange) requirements of the BWM Convention, prior to entry into force on 8 September 2017.

The IMO's MEPC 71 Committee have, 07.07.2017, agreed amendments to Regulation B-3 of the Convention, to implement a new schedule for the D-2 requirements (i.e. ballast water treatment). The changes supersede the implementation schedule contained within IMO Res. A.1088(28).

### New Ships

The requirements are unchanged. That is, ships constructed (keel lay date) on or after 8 September 2017, to which the Convention applies\*, will be required to be fitted with a ballast water treatment system at delivery.

### Existing Ships

The amendments delay the treatment system mandatory installation schedule for two years after entry into force of the Convention, giving vessels 2 to 7 years from entry into force before needing to fit a treatment system, depending on their IOPP renewal survey dates.

Ships, constructed (keel lay date) before 8 September 2017, to which the Convention applies\*, are required to be fitted with a ballast water treatment system:

1) No later than the first IOPP renewal survey on or after 8 September 2017. Providing that this survey takes place on or after 8 September 2019; or that the vessel has undertaken an IOPP renewal survey on or after 8 September 2014 but prior to 8 September 2017.

Putting it in simpler terms, if the completion date of the vessel's last IOPP renewal survey was between 8 Sept 2014 and 7 Sept 2017 then treatment system installation is required at the **next** IOPP renewal survey on or after 8 Sept 2017.

2) No later than the second IOPP renewal survey on or after 8 September 2017. Providing that the first IOPP renewal survey on or after 8 September 2017 takes place before 8 September 2019, and the vessel **has not** undertaken an IOPP renewal survey on or after 8 September 2014 but prior to 8 September 2017.

Putting it in simpler terms, if the completion date of the last IOPP renewal survey was between 8 September 2012 and 7 Sept 2014 then treatment system installation is required at the **second** IOPP renewal survey on or after 8 Sept 2017. (See ANNEX I, diagram)



**Existing Ships (without IOPP surveys)**

Ships constructed (keel lay date) before 8 September 2017, to which the BWM Convention applies\*, which are not subject to Marpol Annex I surveys (i.e. oil tankers <150gt, and other ships <400gt), a ballast water treatment system is required to be fitted to vessels from the date decided by the Administration, but not later than 8 September 2024.

\* Please note that the Convention does not normally apply to:

- ships not carrying ballast water,
- domestic ships,
- ships that only operate in waters under the jurisdiction of one party and on the high seas,
- warships, naval auxiliary or other ships owned or operated by a state (although states are encouraged to adopt appropriate measures to ensure that the ships act in a manner consistent with the Convention), or
- permanent ballast water in sealed tanks on ships, which is not subject to discharge.

NOTE: The IMO resolution containing the changes to the BWM Convention has not yet been formally published, but the agreed text of the changes exist.

Please note that if your ship(s) trade to/from USA, the applicable USCG treatment system implementation schedule is unaffected by these changes, and in many cases is the more onerous regime.

Kindly be guided accordingly.

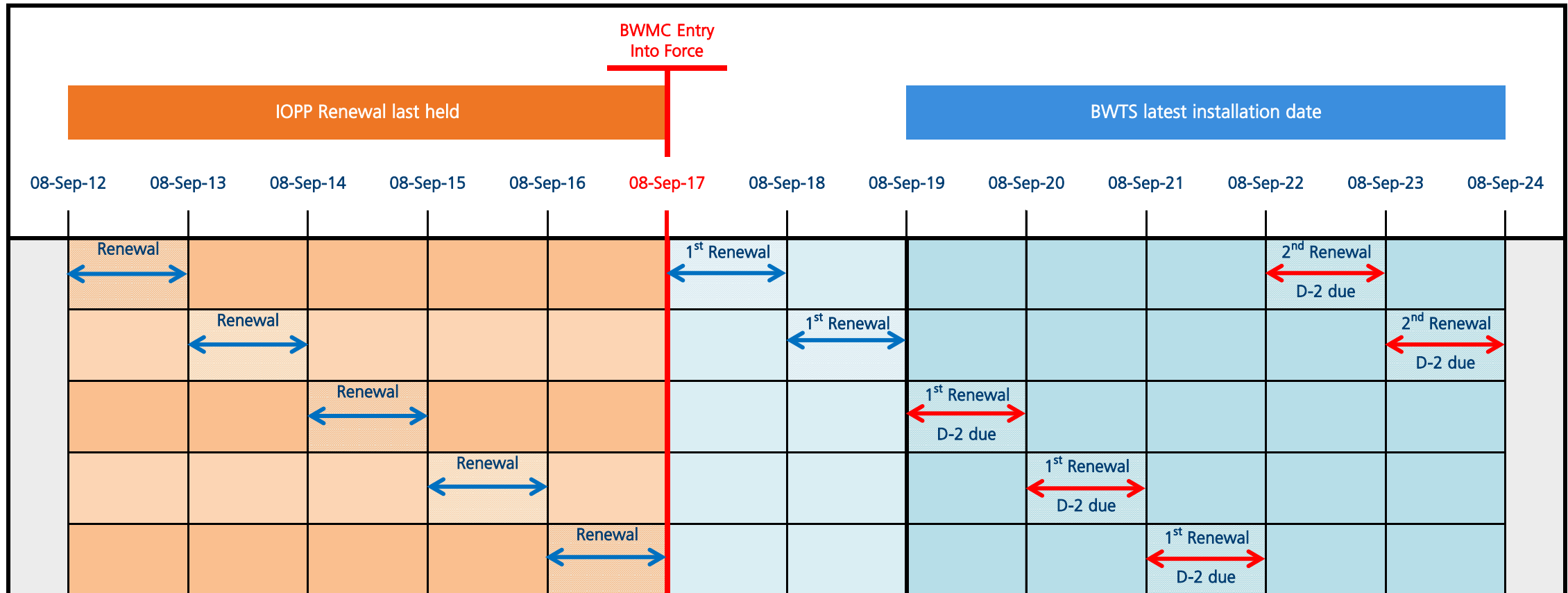
Yours faithfully.

Kristina Melikyan  
Chief Executive Officer  
Venezuelan Register of Shipping Ltd



# Annex I

## Ships Constructed (keel lay date) before 8 September 2017



Renewal	IOPP renewal survey held during this time period
D-2 due	Ballast Water treatment system installation date
↔	Time window for IOPP Renewal Survey
↔	Time window where IOPP Renewal Survey will trigger D-2 implementation