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Shipping Guidance Notice – 158
Ballast Water Treatment Systems – Challenging Water Quality
(To be read in conjunction with SGN 125)

To: Owners, Operators, Master's, Certifying Authorities and Recognised Organisations

1. References

- IMO Resolution MEPC.387(81) – Interim guidance on the application of the BWM Convention to ships operating in challenging water quality conditions
- Shipping Guidance Notice 125 – Ballast Water Treatment Systems – Contingency Measures
- Shipping Guidance Notice 150 - RESOLUTION MEPC.369(80) AMENDMENTS TO THE INTERNATIONAL CONVENTION FOR THE CONTROL AND MANAGEMENT OF SHIPS' BALLAST WATER AND SEDIMENTS, 2004 - Guidance on ballast water record-keeping and reporting
- Shipping Guidance Notice151 - IMO Resolution MEPC 372(80) GUIDELINES FOR THE USE OF ELECTRONIC RECORD BOOKS UNDER THE BWM CONVENTION

2. Introduction

2.1. Via the release of *Shipping Guidance Notice (SGN) 125 – Ballast Water Treatment Systems – Contingency Measures, t*he Gibraltar Maritime Administration (GMA) provided guidance and brought to the attention of Masters, owners, and operators the guidance contained within IMO circular BWM.2/Circ.62 (as amended) in respect of contingency measures under the BWM Convention.

2.2. Since the publication of BWM.2/Circ.62, further interim IMO guidance became available in March 2024 in the form of IMO Resolution MEPC.387(81), which provided additional guidance on measures which may be taken by ships when encountering difficulties related to the operation of ballast water treatment systems (BWTS) affected by challenging water quality (CWQ) to restore or maintain the effective operation of a BWMS, and which should be tried prior to any decision taken to bypassing a BWTS.

2.3. Challenging water quality (CWQ) refers to ambient uptake water having quality parameters (including but not limited to high total suspended solids,2 or turbidity) that cause a properly installed, maintained and operated type-approved BWMS to be temporarily inoperable due to an operational limitation or an inability to meet operational demand. However, temperature and salinity are not parameters that define CWQ.

2.4. Furthermore, revised guidelines have been released under the Paris Memorandum of Understanding on Port State Control (Paris MOU) for the use by Port State Control Officers (PSCO) in respect of Resolution MEPC.387(81), which amongst its contents requires that certain elements should be reviewed/investigated by a PSCO in respect of a ship which despite a properly installed and maintained BWTS may be encountering operational difficulties or limitations.

3. Flag State responsibilities under 3.1.Resolution MEPC.387(81)

3.1. Resolution MEPC.387(81) places a responsibility on Administrations to ensure that ships are fully prepared to encounter CWQ. In this respect Administrations should ensure:

3.1.1. Approved BWMPs should be ship-specific, reflect the operations and safety manual (OMSM) of the BWTS, and include at least: equipment maintenance procedures and intervals, predetermined mitigating measures that may preserve and optimize the treatment process in marginal conditions, a table of critical alarms that justify CWQ action, ship-specific alternatives to bypassing the BWMS, safe bypass procedures that minimize the exposure of tanks/piping to unmanaged water, and a decontamination procedure that reflects the Resolution MEPC.387(81) guidance and is safe for the ship and crew. Administrations should also ensure that crew familiarization includes relevant aspects of this Guidance, BWMS operating instructions and the environmental risks of bypassing BWMS and steps to avoid/minimize them.

3.2. BWTS Bypass

3.2.1. There are two (2) types of bypasses associated with BWTS:

1) Pre-emptive bypass

- Means a BWTS bypass undertaken, prior to or during a ballasting operation, in anticipation of reaching an operational limitation or encountering an inability to meet operational demand.

2) Reactive bypass

- Means a BWTS bypass undertaken during a ballasting operation upon reaching an operational limitation or encountering an inability to meet operational demand.

3.2.2. In respect of reactive bypasses which may be undertaken by the ship without consulting the Administration or the next port State. Port States receiving water from affected tanks should be notified before arrival; and,

3.2.3. In respect of pre-emptive bypass, these are discouraged for the reasons set out in paragraph 29 of MEPC.387(81). However, in cases where pre-emptive bypass may be appropriate, the Administration should ensure this will not impair or damage the environment, human health, property or resources of other States. In bilaterally agreeing to the pre-emptive bypass, the Administration of the ship and the receiving port State should ensure that the pre-emptive bypass will not impair or damage the environment, human health, property or resources of any State. Pre-emptive bypass arrangements should be specific to voyages between specified ports or locations and should be documented in the ship's approved BWMP and the BWRB.

4. Ballast Water Record Book Entries

4.1. Amendments to the Ballast Water Record Book (BWRB) came into effect on 1st February 2025. The amendments additionally took into account entries related to CWQ *(see SGN 150).*

4.2. Guidance is available via BWM.2/Circ.80/Rev.1, example 27, Scenario 3 and 4 for records when bypassing due to CWQ (utilizing entries A and F).

4.3. In respect of ships making use of BWRB in electronic format, reference should be made to *SGN 151.*

5. Requirements for Gibraltar registered ships

5.1. Noting the responsibility placed on Administrations by Resolution MEPC.387(81), the Gibraltar Maritime Administration requires that in respect of Gibraltar registered ships to which the BWM Convention, Regulation D-2 exchange standard is applicable, and which operate in areas of CWQ, that:

1) Suitable measures are developed based on the guidance IMO Resolution MEPC.387(81) and are implemented within the approved ship specific Ballast Water Management Plans (BWMP);

2) Such measures extend to ensuring the reporting of any related instances to both the GMA and applicable Port and/or Coastal States; and,

3) Such measures ensure respective entries are recorded in the BWRB as applicable.

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