

MARINE ENVIRONMENT PROTECTION
COMMITTEE
82nd session
Agenda item 16

MEPC 82/16/5
8 August 2024
Original: ENGLISH
Pre-session public release:

ANY OTHER BUSINESS

Industry experiences with removal of anti-fouling coatings from ships and guidance on best management practices for removal of anti-fouling coatings from ships

Submitted by CESA

SUMMARY

Executive summary: Through this commenting document, CESA kindly suggests further improvements to the *Revised guidance on best management practices for removal of anti-fouling coatings from ships*, presented in document MEPC 82/16/1.

Strategic direction, 1 if applicable:

Output: Not applicable

Action to be taken: Paragraph 22

Related document: MEPC 82/16/1

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.5) and comments on the *Revised guidance on best management practices for removal of anti-fouling coatings from ships*, submitted through document MEPC 82/16/1 (Secretariat).

Background

2 In 2019, MEPC 75 "requested the governing bodies of the London Convention and Protocol, at their next meeting, to consider a revision of the *Revised guidance on best management practices for removal of anti-fouling coatings from ships, including TBT hull paints* (LC-LP.1/Circ.31/Rev.1), in light of the introduction of controls on cybutryne under the AFS Convention, with a view to updating the guidance contained in AFS.3/Circ.3/Rev.1, and to inform the Committee of their consideration accordingly". MEPC 75 also approved draft amendments to the AFS Convention concerning controls on cybutryne and the form of the International Anti-Fouling Systems Certificate.

3 In 2021, MEPC 76 adopted the amendments to the AFS Convention by resolution MEPC.331(76). These amendments were accepted by 1 July 2022 and entered into force on 1 January 2023.

4 During the forty-fifth Consultative Meeting of Contracting Parties to the London Convention in 2023, the governing bodies approved the *Revised guidance on best management practices for removal of anti-fouling coatings from ships* and instructed the IMO Secretariat to issue the revised guidance as soon as possible by way of an LC/LP circular, following a final editorial check and to inform MEPC accordingly.

5 The *Revised guidance on best management practices for removal of anti-fouling coatings from ships* was published as LC-LP.1/Circ.108 on 1 December 2023 and a revised version by the Secretariat was published as LC-LP/Circ.108/Rev.1 and submitted through document MEPC 82/16/1. It replaces the *Revised Guidance on best management practices for removal of anti-fouling coatings from ships, including TBT hull paints* (LC-LP.1/Circ.31/Rev.1).

6 The Committee is invited, through document MEPC 82/16/1, to concurrently approve LC-LP/Circ.108/Rev.1 for issuance as an AFS circular.

7 CESA notes that this revision started in 2019 and that there is currently no output defined for this item at the MEPC. CESA appreciates the intention of finalizing the revision and therefore supports approving the document to be issued as an AFS circular at this stage. It furthermore recognizes that LC-LP/Circ.108/Rev.1 is under the auspices of the LC/LP governing bodies. However, it would like to note that further revisions would be appropriate in order to take account of key issues and innovations and therefore invites the MEPC to consider further improvements to the guidance, such as those highlighted in this submission, and the related process.

Discussion

8 CESA opines that the revised guidance presented through document MEPC 82/16/1 could be further improved and updated, as it does not yet reflect the current state of the art and best practices in the industry. This guidance would therefore significantly benefit from applying a more goal-based approach, providing the industry with flexibility supporting innovations. For instance, several shipyards already deploy alternative techniques to grit blasting and differentiations on environmental effects and conditions would therefore be appropriate.

9 In general, CESA would kindly suggest the following aspects to be improved or added to the guidance:

- .1 the safe management of biological wastes;
- .2 the inclusion of both an environmental and a worker risk assessment referencing both ISO14001 and ISO 45001;
- .3 the inclusion of developments in safer coating removal techniques such as open dry blasting and alternatives like slurry blasting, UHP water blasting with recycled water, and robotic blasting;
- .4 a clarification whether in-water hull cleaning is under the scope of LC-LP.1/Circ.108/Rev.1;
- .5 the sentence: "The most effective biocidal anti-fouling systems are formulated as self-polishing polymer coatings that wear away as the ship is propelled through the water, to expose a fresh layer of biocide."; and

- .6 an emphasis on the safe management and control of all paint particulates from paint removal operations.

10 Specifically, CESA would like to suggest the following amendments to the following sections of the revised guidance in LC-LP.1/Circ.108/Rev.1.

Paragraph 1.1

11 CESA would like to add a note that anti-fouling systems (AFS) are a key technology to minimize the spread of invasive aquatic species via biofouling. Furthermore, the text "The most effective biocidal anti-fouling systems are formulated as" would be better phrased as "The most widely used biocidal anti-fouling systems are formulated as". Effectiveness of self-polishing polymer coating technology may be inferior to newer technologies such as fouling-release coatings. Actual effectiveness will depend on ship type, operating pattern, etc.

Paragraph 2.2

12 It is important to note that, when the hull is washed before AFS removal, the water used would also be a waste product.

Paragraph 3.4: Facility design

13 CESA would appreciate seeing a clear distinction between indoor conservation work and work in a dry dock. Furthermore, High Pressure Water Process should also be included.

Paragraph 3.6: Collection of particulate waste and its handling at the facility

14 Separating contaminated grit with AFS and grit used for other paint layers is very difficult in practice. It is therefore proposed to collect all used grit and dispose of it together and in accordance with the applicable local regulations for AFS.

Paragraph 3.7: Safe wastewater collection

15 CESA kindly suggests adding the following sentence: "Contaminated washing water released should be treated in a process system instead of collected and stored".

Paragraph 3.9: Discharge water requirements

16 The following sentence should be added: "Contaminated discharge water should be regularly sampled and should not exceed the local prescribed discharge requirements".

Paragraph 4.5

17 CESA questions the practical applicability of the rules of thumb mentioned. It believes that this does not contribute sufficiently to the overarching end goal and that these will be counterproductive in practice.

18 In addition, from the point of view of best available techniques, removing and separating AFS paint from underlying layers is not possible. Addressing contaminants of AFS specifically and separate from the processing/removal of the other types of paint will make the intended goal of "limiting the spread of AFS during conservation work" very limited in applicability and unfeasible.

Paragraph 5.3: AFS wastewater collection

19 This paragraph should be updated in line with the amended foregoing section 3.7.

Paragraph 5.4: Collection of particulate waste and its handling at the facility

20 Though CESA appreciates the intention of the text "and removed ... several days", it should be rephrased to better reflect actual operations at the shipyard.

Paragraph 5.7: Grit blasting waste handling

21 CESA suggests to also mention hydroblasting as an alternative, safer, and more environmentally friendly method.

Action requested of the Committee

22 The Committee is invited to consider the suggested improvements to the *Revised guidance on best management practices for removal of anti-fouling coatings from ships* suggested in paragraphs 8 to 21. Moreover, the Committee is invited to consider an appropriate way forward, including agreeing on an invitation to Member States to submit a proposal for a new output to the next session of the Committee.
