



## Baltic Marine Environment Protection Commission

Maritime Group  
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### Action required

The Meeting is invited to take note of the attached comments by Finnish Shipowners' Association (FSA) on BWMC implementation in the Baltic Sea.



Suomen Varustamot  
Rederierna i Finland  
Finnish Shipowners' Association

## **A strict implementation of the Ballast Water Management Convention will undermine the transport network of the Baltic Sea.**

### **The Ballast Water Management Convention (BWMC)**

The BWMC that was adopted in 2004 has not yet come into force. Last year, the IMO Assembly accepted alterations in order to facilitate the ratification. At this stage it needs less than 5 % more of the world tonnage to come into force.

### **2013 Assembly Resolution**

The Assembly resolution from last year dealt with the uncertainty in regard of sampling of BW in port and gave a possibility for a phased in implementation.

### **Equipment Approval**

It did nothing to the concerns shipowners have of the differences between the guidelines for approval of equipment and the demands of the Convention. This has created a situation where IMO approved equipment don't fulfil the convention. This issue has been raised by the ICS and other industry organizations at the last IMO MEPC and will be duly attended during the next PPR and through a study and a correspondence group.

This increases the possibilities for **the convention to come into force** and **our estimation** is that this will happen **within the next 15 months**.

### **BWMC Regulation A-3 and A-4**

The Convention gives possibilities for Exceptions in Regulation A-3 and for Exemptions in Regulation A-4. The differences between these two are mainly that; **Exceptions are situations** in case of emergency, accidents or to minimize pollution and **if the ship take in and discharge BW at the same location. Exemptions are** for national shipping and **for ships operating exclusively between specified ports or locations and subject to risk assessment according to IMO Guideline G7.**

### **Exemptions**

The shipowner/operator is thought to survey the two or more ports he visits regularly and apply for an exemption from the national authorities involved. The port **survey needs to be done in the spring and in the autumn** to determine which different species are present. **The survey thus needs to be done well in advance of the convention coming into force or/and well in advance before the freight has been ordered.**

#### HELSINKI, HELSINGFORS

Hämeentie 19, FI-00500 Helsinki, Puhelin: +358 10 841 0500, Faksi: +358 10 841 0599, Sähköposti: info@shipowners.fi, [www.shipowners.fi](http://www.shipowners.fi)  
Tavastvägen 19, FI-00500 Helsingfors, Telefon: +358 10 841 0500, Telefax: +358 10 841 0599, e-post: info@shipowners.fi, [www.shipowners.fi](http://www.shipowners.fi)  
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#### MARIEHAMN

Hamngatan 8B, 22100 Mariehamn, Telefon: +358 10 841 0500, Telefax: +358 10 841 0599, e-post: info@shipowners.fi, [www.shipowners.fi](http://www.shipowners.fi)  
Hamngatan 8B, AX-22100 Mariehamn, Åland, Finland, Phone: +358 10 841 0500, Fax +358 10 841 0599, E-mail: info@shipowners.fi, [www.shipowners.fi](http://www.shipowners.fi)



Suomen Varustamot  
Rederierna i Finland  
Finnish Shipowners' Association

**An exemption can only be in force for five years according to the G7 and it may be revoked on short notice if new species are found in either port.** The exemption is also subject to an intermediate review.

## HEL COM/OSPAR Joint Harmonized Procedures

The Inter-governmental organizations of the Baltic Sea and North Sea (HELCOM and OSPAR) have developed Joint Harmonized Procedures (JHP) for risk assessment needed for an exemption. These can be found at:  
[http://jointbwmexemptions.org/ballast\\_water\\_RA/apex/f?p=100:13:17151993977082::NO](http://jointbwmexemptions.org/ballast_water_RA/apex/f?p=100:13:17151993977082::NO)

The cross reference table below shows the outcome of a risk assessment according to these JHP:

	Arrive	Gdynia	Gothenburg	Hamina	Kokkola	Kotka	Muuga	Naantali	Sköldvik	Turku
Depart		POL	SWE	FI	FI	FI	EST	FI	FI	FI
Gdynia	POL		High	High	High	High	High	High	High	High
Gothenburg	SWE	High		High	High	High	High	High	High	High
Hamina	FI	High	High		High	High	High	High	High	High
Kokkola	FI	High	High	Low		Low	High	High	High	High
Kotka	FI	High	High	Low	High		High	High	High	High
Muuga	EST	Low	Low	High	High	High		Low	Low	High
Naantali	FI	High	High	High	High	High	High		High	High
Sköldvik	FI	High	High	High	High	High	High	High		High
Turku	FI	High	High	High	High	High	High	Low	High	

This shows that it is impossible to get exemption according to the JHP for ships in traffic between two specific ports. The exemption may be valid for one direction but not the other.

## Cost of Surveys

The Danish Ministry of the Environment did a survey on BWMC in 2013 and published it early in 2014. According to the survey, an exemption involving two ports cost 61,000-83,000 € or approximately 36,000 €/port.

## Prima Shipping Ab

One of the Finnish Shipowners Association members is Prima Shipping Ab (PS). The company owns 7 ships and manage 7 more ships a total of 14 ships.

## Details of Prima Shipping

The median ages of the ships that they own and manage are 25.5 years and the DWT 2862 and a ballast water capacity of less than 1000 tons.

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Hämeentie 19, FI-00500 Helsinki, Puhelin: +358 10 841 0500, Faksi: +358 10 841 0599, Sähköposti: info@shipowners.fi, [www.shipowners.fi](http://www.shipowners.fi)  
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Suomen Varustamot  
Rederierna i Finland  
Finnish Shipowners' Association

Last year (2013) they approached 102 different ports in the Baltic Sea Area (see attached map) carrying cargo as specified in the table below:

Agri Lime	Copper cathodes	Kaolin	Soyapelllets
Aluminium slagg	Copper Slagg	Limestone	Split stone in bulk
Am.nitr.based Fertilizers	Crushed Limestone	Maize	Steel Coils
Ammonium Sulphate	Crushed Rocks	Mesalime	Steel pipes
Ammonius Sulf.	Ferix - 3	Oats	Steel plates
AquaMaster 6kpl	Ferro Sulphate	Pea Coke	Steel reels
Barley	Ferrochrome	Pig Iron	Steel scrap
Battery scrap	Ferrox	Project Cargo	Steel Sheet
Battery waste	Fertilizer BB	Pulp wood	Sugar Beet Pulp Pellets
Birch pulp wood	Fishmeal	Quicklime	Sunflowerseed pellets
Blasting grits BB	Floodgates	Rapeseed	Timber (logs)
Chemical fertilizers	Gearbox + case	Rapeseed expeller	Urea
Burned lime	Glass Culletts	Rye	Wheat
Calسيوم sulphate	Granite blocks	Salt	Windmill parts
Cement klinker	Gravel	Scrap metal	Wood pellets
Coal residues	Gypsum	Sellulosa	Woodpulp
Coke	House modules	Sodium silicate	
Conifer pulp wood	Kalkkikivi	Soy beans	

## Cost of exemptions

If the median cost of an exemption is 36,000 € the company needs to put up with 3,6 M€ for exemptions. Naturally Prima Shipping is not the only shipping company calling on these ports but it is not decided who is going to pay for the exemptions, neither who will have to do the survey.

## Exemption of Bio-Geographic Area

A certain bio-geographical area could be considered the same risk area and there is evidence that the Baltic Sea could be considered as such. Firstly, almost all of the invasive alien species that have entered the Baltic Sea has spread to every corner.

The currents and the water masses move mainly in an anticlockwise way. Strong wind situations may alter this and alter the directions of the currents. This means that sooner or later anything introduced from the outside of the Baltic will be moved from one place to another.

It is crucial to prevent alien species to enter the Baltic but this will not be fully done until after five years of entering into force of the Convention. Large ships from

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different parts of the world may use ballast water exchange and will release more untreated BW in the Baltic Sea than small vessels that travels mainly within the Baltic.

The threat of introducing new alien species therefore remains and an exception of **intra-Baltic trading ships** will not increase this risk. They **should** therefore **be exempted** at least for as long as the transitional period continues.

Without a same risk area exemption, many of the transport made today will terminate or **move to road transport** and this will **decrease the environmental performance of transport**.

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Map of Prima Shipping ports in the Baltic Sea



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