Shipping Guidance Notice – 065

Ballast Water Management Convention: Implementation – De-coupling the International Oil Pollution Prevention Certificate (IOPP) from the Harmonised System of Survey & Certification System (HSSC)

To: Ship Owners, Operators, Masters & ROs

References:

- International Convention for the Control and Management of Ships’ Ballast Water and Sediment, 2004
- GMA - BWM Implementation Guidance

Background:
The International Convention for the Control and Management of Ships’ Ballast Water and Sediment, 2004, (BWM Convention) comes into effect on 8th September 2017. This may require the fitting of an approved ballast water management treatment system (BWMT) not later than the first renewal date of the ship’s IOPP certificate after the Convention implementation date. It may be possible to postpone the installation of a BWMT system by de-harmonising the IOPP survey from the HSSC and undertaking IOPP renewal surveys before the implementation date of the BWM Convention in order to postpone the installation of a BWMT system.

Guidance:
There is no legal reason to prevent the decoupling of single certificates and this is not prohibited by the HSSC system. However, while there are clear reasons for decoupling, the GMA recommends bringing all relevant renewal surveys (class and statutory), where practicable, forward, thereby keeping the IOPP certificate within the HSSC.

If the IOPP is decoupled, then the GMA recommends realignment of all HSSC surveys at the next renewal date of the decoupled IOPP, resulting in a number of surveys therefore needing to be undertaken early in order achieve harmonization and the benefits that the HSSC system.

Alternatively, the IOPP annual and renewal dates may remain de-coupled from the HSSC.
Example

The above timeline diagram illustrates an example for a vessel having the **HSSC Renewal in 2018 (red timeline)**, showing that if the IOPP is de-harmonized (**blue timeline**) in 2016, realignment of the HSSC will require all other relevant renewal surveys (class and statutory) to be **brought forward**, prior to the HSSC five year interval.

If decoupling is preferred, the Ship Manager / Owner should inform the relevant Classification Society and the GMA of their intention to perform an early IOPP renewal survey in order to de-couple the IOPP certificate from the other statutory certificates. This information should include the intended survey date as early as possible to allow all the necessary arrangements in advance.

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Issue date: 09 November 2016

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