

Circular From: The WEST P&I Club**Date: 7 June 2024**

Ballast Water Management - CWQ Challenges for D2 Standard Compliance

The final phase for full compliance with the D2 Standard of the Ballast Water Management Convention is effective from 08 September 2024. Consequently, more operators are encountering inherent issues with the D2 standard for Ballast Water Management Systems (BWMS), namely the issue of conducting ballast operations in Challenging Water Quality (CWQ) conditions.

MEPC 81 defines CWQ as waters with quality parameters — such as high total suspended solids or turbidity — that render a properly installed, maintained, and operated type-approved Ballast Water Management System (BWMS) temporarily inoperable. This inoperability is due to operational limitations or an inability to meet operational demands, including issues like filter clogging, high differential pressure, low UV-I alarms, and Total Residual Oxidants (TRO) alarms at the inlet and discharge points.

As a result of CWQ, various BWMS cannot function properly, severely disrupting ballast and deballast operations in ports and directly impacting cargo operations that require synchronisation with ballasting to ensure ship stability. Subsequently, cargo discharge operations must be significantly slowed or stopped when the BWMS cannot operate at its standard rate due to CWQ, resulting in longer unloading times and higher costs.

CWQ has been a much-discussed issue at the IMO, with the most recent gathering of Member States at MEPC's 81st session. The IMO has now issued interim guidance effective 22 March 2024, through MEPC.387(81), to ships, administrations, port states, and BWMS original equipment manufacturers (OEMs) to mitigate this issue and facilitate closer compliance with the D2 standard.

To this end and in collaboration with the IMO following MEPC 80, INTERTANKO has developed a Ports with Challenging Water Quality (PCWQ) database for access to member states, parties to the BWM Convention, other observed organisations, and industry stakeholders. Non-INTERTANKO Members can access the database [here](#).

The database allows vessels to implement contingency measures when encountering ports known to have CWQ before arriving. It will also provide a historical log enabling Members to see how the CWQ situation at a particular port has evolved.

It's important to note that amendments to the BWM Convention have been agreed upon, specifically affecting regulations A-1 and B-2 concerning the use of electronic record books. These amendments are set to take effect from 01 October 2025. Members can visit the links below to view these resources provided by the IMO and INTERTANKO.

[INTERTANKO - Ports with Challenging Water Quality \(PCWQ\) Database](#)

[IMO Resolution MEPC.387\(81\) Interim Guidance on the Application of the BWM Convention to Ships Operating in Challenging Water Quality Conditions](#)

Members requiring further guidance should contact the [Loss Prevention Department](#).

Source of Information:
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