

SUB-COMMITTEE ON SHIP DESIGN AND  
EQUIPMENT  
55th session  
Agenda item 12

DE 55/12/20  
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**DEVELOPMENT OF A MANDATORY CODE FOR SHIPS OPERATING IN  
POLAR WATERS**

**Sewage and sewage-related discharges in polar regions**

**Submitted by FOEI, IFAW, WWF and Pacific Environment**

**SUMMARY**

*Executive summary:* In this document, FOEI, IFAW, WWF, and Pacific Environment request that heightened protection and standards for discharges of sewage and sewage-related wastes, e.g., grey water and sewage sludge, are considered and adopted for vessels operating in polar waters and are included in the mandatory Polar Code, and offer possible measures that should be considered in further discussions on this subject

*Strategic direction:* 5.2

*High-level action:* 5.2.1

*Planned output:* 5.2.1.19

*Action to be taken:* Paragraph 9

*Related documents:* DE 54/13/8, DE 54/INF.5; DE 55/12/3 and DE 55/12/5

**Introduction**

1 This document<sup>1</sup> is submitted in response to documents DE 55/12/3 from New Zealand and DE 55/12/5 from Norway considering environmental protection provisions in the Polar Code, in accordance with the provisions of paragraph 4.10.5 of the IMO Committees' Guidelines (MSC-MEPC.1/Circ.2).

<sup>1</sup> The preparation of this document for the IMO's DE Sub-Committee was assisted by the Antarctic and Southern Ocean Coalition (ASOC), an umbrella NGO with expert observer status at the Antarctic Treaty Consultative meetings (ATCM) and meetings of the Commission for the Conservation of Antarctic Marine Living Resources (CCAMLR). The Whale and Dolphin Conservation Society (WDCS) and Earthjustice also support this document.

## **Proposal for environmental protection provisions in the Polar Code**

2 The co-sponsors of this document welcome document DE 55/12/3 from New Zealand and the proposal for adoption of a precautionary approach in the proposed Polar Code with stricter control applied when insufficient information is available on the potential effects or likelihood of any substances entering the marine environment in these regions. The co-sponsors also welcome document DE 55/12/5 from Norway and the proposal for an environmental protection chapter for inclusion in the Polar Code, though it is noted that it is necessary to include a functional requirement and prescriptive requirement in the draft chapter (see annex) to mirror the concern raised in paragraph 9 with respect to sewage discharges in ice-covered waters.

### **Measures to control sewage and sewage-related discharges**

3 Both documents DE 55/12/5 and DE 55/12/3 refer to controls on the discharge of sewage from ships in polar waters. Document DE 55/12/5 proposes that distance limitations for discharges specified in MARPOL should apply to distance to land and ice-covered waters, while document DE 55/12/3 proposes that polar regions be added as special areas under MARPOL Annex IV, in a similar manner to that proposed for the Baltic Sea (MEPC 61/7), and that within the proposed special areas stricter controls are applied to sewage discharges.

4 The co-sponsors of this submission welcome these proposals and, in particular the suggestion that special area status under Annex IV should be considered for polar waters along with more stringent measures for the control of sewage. Further consideration on the necessary controls on sewage and sewage-related, e.g., grey water and sewage sludge discharges, in order to provide adequate protection for sensitive polar ecosystems, is clearly necessary and would benefit from consideration by MEPC. The co-sponsors have previously provided information on the vulnerability and risks to polar marine ecosystems from the discharge of sewage, sewage sludge and grey water (DE 54/13/8), which highlighted that polar marine environments will be less tolerant to rapid changes in the nutrient status of the water column or seabed than other marine environments and that these discharges (sewage, sewage sludge and grey water) are all possible vectors for the introduction of alien species. Polar marine environments experience delicate nutrient balances and in some areas these are already under stress due to increasing temperatures resulting in increased run-off from rivers.

5 In addition, document DE 54/INF.5 (Norway) which addressed environmental aspects of emissions and discharges from shipping during regular operation in polar areas, raised concerns surrounding unregulated discharge of grey water and the potential for a variety of other chemicals to be mixed in the effluents.

6 Document DE 54/13/8 also notes that measures to control sewage discharges were not established with polar waters in mind, but were developed with temperate or tropical climates in mind where decomposition of organic material is faster. Document DE 54/13/8 identifies a series of options for strengthening regulations addressing sewage and sewage-related discharges, such as grey water and sewage sludge, in polar waters, and these are summarized below:

- .1 banning all discharges of treated or untreated sewage and grey water from vessels operating in polar regions and certified to carry more than a specified number of people;

- .2 creating sewage, grey water and sewage sludge "no discharge zones" in the most sensitive and biologically rich areas; and
- .3 requiring advanced waste water treatment systems on board all vessels.

The co-sponsors believe that these options should be considered along with the proposals made in documents DE 55/12/5 and DE 55/12/3.

7 In considering strengthening standards on sewage and sewage-related waste (grey water and sewage sludge) discharges, it will also be important to consider provision of adequate waste reception facilities.

8 This submission requests that a functional requirement and prescriptive requirements leading to heightened protection and standards for discharges of sewage, grey water and sewage sludge are considered and adopted for vessels operating in polar waters and are included in the mandatory Polar Code, and offers possible measures that should be considered in further discussions on this subject.

#### **Action requested of the Sub-Committee**

9 The Sub-Committee is invited to consider the information in this document when considering the environmental protection measures, necessary to provide adequate protection for polar waters, in a mandatory Polar Code.

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