



LOSS PREVENTION UPDATE

BALLAST WATER MANAGEMENT – NEW RECORDING STANDARDS AND RECENT LESSON LEARNED

Record keeping is a vital part of complying with the ‘International Convention for the Control and Management of Ships’ Ballast Water and Sediments, 2004’ (BWM Convention), and an area that is scrutinised often during Port State Control (PSC) inspections. Experience gained since the adoption of the convention in 2017 has shown that approximately 70% of PSC deficiencies relating to the BWM Convention, have been caused by incorrect or inadequate record keeping.

Identifying this, the International Maritime Organization (IMO) has substantially modified the existing Appendix II of the BWM Convention, providing a new format for the Ballast Water Record Book (BWRB). The full amendment can be found in Resolution MEPC.369(80). This new format must be used from **1 February 2025**. This expanded set of required entries provides greater detail for standard operations, whilst also adding new sections for when failures occur to a ballast water management system, or to accurately record ballast tank cleaning/removal of sediments. We encourage the review of circular BWM.2/Circ.80/Rev.1 as this contains comprehensive guidance on ballast water record keeping, and a substantial set of sample entries for the BWRB when considering various scenarios. This recent revision also now includes example entries for when Challenging Water Quality (CWQ) conditions are encountered.

Electronic record books are also allowed by the BWM Convention, and these come with obvious advantages when compared with paper-based systems. Previous guidance on the subject from the IMO was simply that an electronic record should at least contain all the information required in Appendix II of the BWM Convention. Now, to provide consistency and standardisation, from **1 October 2025** if an electronic system is to be used, it must be approved by the flag state administration (or recognised organisation if allowed). To assist in the approval process, Resolution MEPC.372(80) has been produced, and this contains the acceptable IMO performance standard. A ship-specific declaration should be issued and carried on board. We recommend obtaining compliance earlier than the date of enforcement if your flag administration allows this.

Being in electronic format does not eliminate the requirement for a ship to retain records on board for a minimum period of two years after the last entry has been made. Additionally, these records must be maintained under the company’s control for at least a further three years.

For the above changes, we recommend that the ballast water management plan is reviewed to confirm that any references to record keeping reflect the new requirements as applicable.



CASE STUDY

The Club has become aware of a recent occurrence, where a ship received a change in voyage orders and the new discharge port required a ballast water exchange to be carried out mid-voyage. Unfortunately, the ship had insufficient treatment chemical available for a further full ballast exchange in accordance with the D-2 standard. This meant the ship had to deviate from its voyage to obtain additional supplies of the treatment chemicals. It is recommended that spares and consumables required for the operation of a ballast water management system are added to the ships list of critical spares. Appropriate minimum stock levels should be identified, and replacements ordered when the stock reaches these levels.

Compliance with the BWM Convention continues to produce practical difficulties in application. Noting this, the IMO Marine Environment Protection Committee (MEPC) continues to work through a review of the convention, with a target of adopting all identified amendments by MEPC 85, planned to take place in Autumn 2026. The Britannia Loss Prevention team will continue to monitor changes and look to share information as and when it becomes available.

KEY TAKEAWAYS

- 1 NEW BALLAST WATER RECORD BOOK FORMAT FROM 1 FEBRUARY 2025
- 2 ELECTRONIC RECORD BOOKS MUST COMPLY WITH IMO STANDARD BY 1 OCTOBER 2025
- 3 ENSURE BALLAST WATER MANAGEMENT PLANS ALIGN WITH THE NEW REQUIREMENTS

FURTHER INFORMATION

For further information, please do not hesitate to email lossprevention@tindallriley.com.

DISCLAIMER

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