



ESSENTIAL CHANGES TO BALLAST WATER RECORD-KEEPING

The International Convention for the Control and Management of Ships' Ballast Water and Sediments (BWM Convention) requires ships to maintain a Ballast Water Record Book (BWRB) to document ballast water discharges and operations. This article highlights recent amendments to the BWRB requirements, emphasizing their significance for compliance and environmental protection.

KEY NOTES

- New Form of BWRB
- Guidance on ballast water record-keeping
- Guidelines for the use of electronic BWRB
- New requirements for the use of electronic BWRB

New Form of BWRB

At its 80th session, the Marine Environment Protection Committee (MEPC) adopted amendments to the BWRB form (Appendix II of the BWM Convention) as detailed in resolution MEPC.369(80). As of February 1, 2025, the BWRB must contain the information specified in the amended form. Until then, the existing form remains mandatory. Shipowners may opt for the early implementation of the new form of BWRB before this due date, provided they obtain authorization from the vessel's flag Administration.

Guidance on Ballast Water Record-Keeping

MEPC 80 approved the *Guidance on Ballast Water Record-Keeping and Reporting* (BWM.2/Circ.80) to clarify when and how to record operations in the BWRB. This guidance includes three parts:

1. **Ballast Water Record Book:** Includes standardized formats to facilitate efficient record-keeping and inspections, and instructions for storing records. Example entries in Appendix I of the guidance illustrate how various ballast water operations and circumstances should be recorded in the BWRB.
2. **Ballast Water Reporting Form:** Contains an example ballast water reporting form (BWRF) together with instructions for completion. A BWRF may be submitted before entry into a port State that requires specific information regarding the management of ballast water on ships bound for its ports, offshore terminals or anchorage areas.
3. **Voluntary Tank-by-Tank Log:** Explains how to maintain voluntary tank-by-tank records of ballast water operations that may facilitate the completion of a BWRF by allowing the crew to efficiently track the contents of each tank and hold that carries ballast water.

Furthermore, MEPC 82 approved the *2024 Guidance on Ballast Water Record-Keeping and Reporting* (BWM.2/Circ.80/Rev.1), revoking BWM.2/Circ.80 in order to provide guidance on recording operational scenarios related to challenging water quality in the BWRB, in line with the *Interim Guidance on the Application of the BWM Convention to Ships Operating in Challenging Water Quality Conditions* (resolution MEPC.387(81)).

According to the *Guidelines for Ballast Water Management and Development of Ballast Water Management Plans (G4)* set out in resolution MEPC.127(53) amended by resolution MEPC.306(73), the Ballast Water Management Plan (BWMP) should contain guidance on the recording requirements as per the ship's BWRB provided for under the BWM Convention, including details of exemptions granted to the ship under Regulations B-3 or C-1. Additionally, the BWMP should include provisions for crew training and familiarization with the BWRB, and the maintenance of records. MEPC 80 adopted amendments to these guidelines, set out in resolution MEPC.370(80), which provides that when recording ballast water operations and exemptions, the guidance provided in circular BWM.2/Circ.80/Rev.1 should be taken into account. Furthermore, where a port State requires specific information regarding the management of ballast water on a ship bound for a port, offshore terminal or anchorage area in that port State, a completed BWRB may be submitted before entry into that port State while the Tank-by-Tank Logs, although not mandatory, may facilitate the completion of a BWRB.

Guidelines for the Use of Electronic BWRB

The use of electronic BWRBs is permitted in accordance with Regulation B-2 of the BWM Convention. MEPC 80 adopted guidelines for the use of electronic BWRB. These guidelines are set out in resolution MEPC.372(80) and prescribe the required system specifications:

- The use and output presentation of electronic BWRBs must satisfy the requirements of the BWM Convention.
- Where possible, automated logging technology should be leveraged, and measures should be implemented to prevent attempts at data manipulation or falsification.
- The electronic BWRBs should be capable of retaining all records made for the minimum period specified in the BWM Convention.
- Updates to the electronic BWRBs should ensure that pertinent BWM Convention amendments are incorporated without the loss of existing records.
- To maintain the security and accountability of electronic BWRBs, the system should implement Role Based Access Control, Audit Logging and measures against unauthorized changes to records and entries.
- The master of the ship should be provided with the additional capability to verify a single or series of saved entries.
- Regarding the storage of data, electronic BWRBs should be part of the Information Technology Business Continuity Plan, which includes having a method for backing up and recovering data.
- The electronic BWRB should be backed up automatically to offline storage in an appropriate format, and an alternate power supply to the BWRB should be considered.

These guidelines establish consistent technical specifications and criteria to standardize the approval process. The electronic BWRB should undergo an assessment by the flag State or an authorized Recognized Organization (RO) to ensure compliance with the established guidelines. Following the assessment, if the specified requirements of the conventions and the guidelines are met, the *Declaration of BWM Convention Electronic Record Book* is issued. A copy of the declaration should be carried on board for regulatory surveys or inspections.

Additionally, the guidelines specify relevant inspection requirements. An electronic BWRB should be capable of meeting company verification and audit requirements, including integration with the ship's safety management system as per the International Safety Management Code. Furthermore, the electronic BWRB should comply with all flag State and survey requirements and adhere to the control provisions set out in the BWM Convention. It should also meet the general requirements established in the Procedures for Port State Control, 2021 (resolution A.1155(32)), as amended, and support the detection of violations and enforcement of the Convention as described in Article 10 of the BWM Convention.

The use of electronic BWRBs does not relieve shipowners of their obligation to accurately maintain and produce records during inspections, as mandated by the BWM Convention. If a ship is unable to present the electronic BWRB or a declaration provided by the flag Administration during a Port State Control (PSC) inspection, the PSC officer may request an alternative verified copy of the records or a hard copy record book for verification.

New Requirements for the Use of Electronic BWRBs

MEPC 81 adopted amendments to regulations A-1 and B-2 of the BWM Convention, introducing new requirements for the use of electronic BWRBs. These amendments, detailed in resolution MEPC.383(81), will take effect on October 1, 2025.

Regulation A-1 was amended to include a definition of the electronic record book. Additionally, Regulation B-2 was amended to require that electronic BWRBs be approved by the flag Administration in accordance with the IMO's guidelines specified in resolution MEPC.372(80). Ballast water operations must be recorded promptly in the BWRB, with each entry signed by the officer in charge of the operation concerned. The amendments also stipulate that when an electronic BWRB is utilized, each group of electronic entries must be verified by the master in a timely manner.

Recommended Actions

Shipowners must ensure that their BWRBs comply with the new format outlined in resolution MEPC.369(80) by February 1, 2025. When recording ballast water operations carried out and exemptions granted under regulations B-3 or C-1, ship crews should follow the guidance provided in circular BWM.2/Circ.80/Rev.1, which includes recording operational scenarios related to challenging water quality, in line with resolution MEPC.387(81). The BWMP should be updated to reflect this information as per resolution MEPC.370(80). It is also important to note that, according to regulation B-2.2, the BWRB must be maintained on board the ship for a minimum of two years after the last entry, followed by a minimum of three years under the company's control.

Additionally, shipowners are encouraged to adopt electronic BWRBs to fulfill their recording and reporting obligations. Digital record-keeping alleviates the administrative burden of paperwork and showcases environmental awareness by reducing paper usage. The electronic BWRB installed on board must be approved by the flag Administration or an authorized RO taking into account the relevant IMO guidelines. A copy of the declaration should be available on board.

References

| Document | Title |
|-------------------------------------|---|
| MEPC.369(80) | Amendments to the International Convention for the Control and Management of Ships' Ballast Water and Sediments, 2004. Amendments to appendix II (Form of Ballast Water Record Book) |
| BWM.2/Circ.80/Rev.1 | 2024 Guidance on ballast water record-keeping and reporting |
| MEPC.387(81) | Interim guidance on the application of the BWM Convention to ships operating in challenging water quality conditions |
| MEPC.127(53) | Guidelines for ballast water management and development of Ballast Water Management Plans (G4) |
| MEPC.306(73) | Amendments to the Guidelines for ballast water management and development of Ballast Water Management Plans (G4) (resolution MEPC.127(53)) |
| MEPC.370(80) | Amendments to the Guidelines for ballast water management and development of Ballast Water Management Plans (G4) (resolution MEPC.127(53), as amended by resolution MEPC.306(73)) |
| MEPC.372(80) | Guidelines for the use of electronic record books under the BWM Convention |
| MEPC.383(81) | Amendments to the International Convention for the Control and Management of Ships' Ballast Water and Sediments, 2004. Amendments to regulations A-1 and B-2 (Use of electronic record books) |
| A.1155(32) | Procedures for Port State Control, 2021 |

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