Safety Seminar, August 2025

Marine Department ("MD")

Participant's questions and MD's answers

Cargo Ship's Safety

For more information regarding Cargo Ship's Safety, please contact *ss_css@mardep.gov.hk*

Question 1

Is it mandatory to submit an application for dispensation through a ship's Recognized Organization ("RO")? Furthermore, could MD consider issuing a circular letter to elucidate the procedural requirements for dispensation applications, including a detailed enumeration of the necessary supporting documentation?

MD:

As stated in our Frequently Asked Questions issued on 31 August 2021 (https://www.mardep.gov.hk/filemanager/en/share/faq/pdf/faq.pdf), applications for dispensation do not necessary to be submitted through a ship's RO. The involvement of ROs could, which provide expert advice, including requirements of relevant international conventions and constructive mitigation measures, can expedite the exemption approval process. Dispensation application form can be downloaded from MD's website (https://www.mardep.gov.hk/filemanager/en/share/forms/pdf/md606.pdf), which clearly outlines the procedural requirements for dispensation applications. Given the shipping company's robust safety and risk management system and the expert advice provided by ROs, MD also offers a dedicated 24-hour hotline for immediate guidance on urgent application procedures, thus enabling the timely issuance of dispensations.

Question 2

Is it mandatory to attach a letter of approval for a ship's ballast water management plan ("BWMP") issued by the ship's RO, and is the affixation of an approval stamp in situ considered acceptable? Additionally, are there any relevant circular letters or official guidance documents available for reference on this matter?

MD:

According to Regulation B-1 of Ballast Water Management (BWM) Convention, each ship shall have on board and implement a BWMP. Such BWMP shall be approved by a RO authorised by MD and take into account the guidelines developed by the International Maritime Organization (IMO). For matters related to the BWMP and its approval, reference should be made to MEPC.127(53) and its amendments. Shipowners

and ship managers are required to contact the ROs authorized by MD for detailed procedures for BWMP approval. The BWMP approval document issued by the RO should be retained on board for inspection.

Question 3

Is it imperative for contingency measures employing the D1 standard to be explicitly incorporated within the ship's BWMP? In the absence of such provisions within the BWMP, is it permissible to implement the D1 standard during vessel operations in challenging water quality ("CWQ") conditions?

MD:

Shipowners and ship managers should develop contingency measures in BWMP in accordance with MEPC.387(81) to address CWQ and prioritize compliance verification activities. Whether to incorporate the D1 standard into contingency measures should be based on the performance and self-monitoring functions of the BWMS, as set out in paragraph 8 of MEPC.387(81), following predetermined actions. Ballast water exchange under D-1 standard through bypassing the BWMS should always be considered as the last resort, and the BWMS should be used as far as practicable to treat ballast water with CWQ, as stipulated in paragraph.10 of MEPC.387(81). Following a bypass event, the BWMP should include a procedure for decontaminating ballast tanks, taking into account the example procedure set out in Appendix 1 and the sample process diagram 4 in Appendix 2 of MEPC.387(81).

The following IMO guidelines may be referred to when preparing BWMPs for approval by the ROs and for the operation of ships under CWQ conditions:

1. BWM.2/Circ.62, Guidance on contingency measures under the BWM Convention;
2. MEPC.387(81), Interim guidance on the application of the BWM Conventions to ships operating in challenging water quality conditions;
3. MEPC.127(53), Guidelines for ballast water management and development of ballast water management plans (G4);
4. MEPC.306(73), Amendments to the guidelines for ballast water management and development of ballast water management plan (G4); and
5. 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)).

Question 4

After updating the contents of the BWMP, such as incorporating operational scenarios related to challenging water quality conditions, is it necessary to submit the BWMP for re-approval?

MD:

Regarding the re-approval of the BWMP in relation to amendments of the guidelines, the necessity depends on whether the BWMP provisions require amendment to comply with

the updated guidelines and the specifics of the ship's operations. Please be reminded that any amendments or changes to the provisions of the BWMP require re-approval in accordance with paragraph 2.5.2 of MEPC.127(53). If the operational procedures for CWQ is considered as mandatory provisions under Section 3, it is reasonable to have the BWMP re-approved. Shipowners and ship managers should consult with the ROs authorized by MD for guidance on this matter.

Question 5

Is it mandatory for each vessel to have a documented procedure governing the use of ballast tanks for the temporary storage of treated sewage and/or grey water? For instance, if a vessel is equipped with a dedicated grey water storage tank, is the implementation of such a procedural amendment still requisite?

MD:

Compliance with Annex IV of MARPOL depends on the ships as specified in Regulation 2 of the Annex and specific ship operations as specified in Regulation 3 of the Annex. For the temporary storage of treated sewage and/or grey water, a plan must be developed that includes detailed procedures, risk assessments and assessments of the ship's structural strength for the temporary arrangements to the vessel's designated temporary compartment. This plan must be approved by the ship's RO authorized by MD. Detailed guidance on implementation should be sought from that RO.

Please noted that, as stated in paragraph 15 of BWM.2/Circ.82, the BWMP should include a ship-specific change-over procedure from ballast water storage to treated sewage or grey water storage and back to ballast water storage. Please be reminded that if a ship is equipped with a dedicated grey water storage tank and has a need to temporarily store treated sewage and/or grey water in ballast water tanks for some reason, then it should follow BWM.2/Circ.82.

Port State Control

For more information regarding Quality Assurance, please contact *hkpsco@mardep.gov.hk*

Question 6

Is it requisite that functional tests of the ballast water management system, such as the by-pass valve alarm test, be formally documented in the ballast water record book (BWRB)?

MD: According to Regulation B-2 of BWM Convention, each operation concerning ballast water shall be fully recorded without delay in the Ballast Water Record Book. For functional tests of the ballast water management system, there have no requirement be formally documented in the ballast water record book.

Question 7

In instances where the volume of ballast water recorded in the BWMS diverges from the actual quantity, which figure shall be recorded in the BWRB — the recorded system value or the actual measured amount?

MD: In the event of significant deviations, please consult the BWMS manufacturer for verification.

Question 8

Paragraph 3.2.1 of MEPC 81/16/Add.1, Appendix 1, stipulates that a sufficient volume of treated uptake water should be pumped through to reduce the concentration of organisms in the tank to the standard in Regulation D-2, at least 1.66 times the volume specified by Paragraph 2 of Regulation D-1 (Regulation D-1.2), if required by the receiving port State. What is the precise interpretation of this 1.66 multiplier? Furthermore, what constitutes the definitive quantity of ballast water exchange under this provision?

MD: According Regulation D-1.2 of BWM Convention, for ships exchanging ballast water by the pumping-through method, pumping through three times the volume of each ballast water tank shall be considered to meet the standard described in paragraph 1 of Regulation D-1, that Ships performing Ballast Water exchange in accordance with this regulation shall do so with an efficiency of at least 95 percent volumetric exchange of Ballast Water.

According to Section 3.2.1 of MEPC 81/16/Add.1, sufficient treated ballast water must be pumped to reduce the biological concentration in the tanks to the standards specified in Regulation D-2, and this amount must be at least 1.66 times the volume specified in Regulation D-1.2 (the volume specified in Regulation D-1.2 is three times the volume of each ballast water tank).

Hong Kong Shipping Registry

For more information regarding Hong Kong Shipping Registry, please contact *hksr@mardep.gov.hk*

Question 9

The protracted processing period for the issuance of ship station licenses has significantly impaired both the operational efficiency and the reputation of the Hong Kong Shipping Registry. Would it be feasible to synchronize the issuance of ship station licenses with the ship registration process? Additionally, could you kindly advise on the anticipated timeline for the implementation of the electronic ship station license system?

MD: Shipowners are advised to commence their application for ship station licence ("SSL") with Office of the Communications Authority ("OFCA"), upon receipt of the Approval-in-principle ("AIP") Letter from HKSR, in which Call Sign is clearly stated.

As per MD's communication with OFCA, it is understood that OFCA is currently in the progress of updating/developing of its IT infrastructure for availability of e-SSL. For the implementation timeline, you may contact OFCA at licence.mob@ofca.gov.hk or (852) 2961 6282.