

USCG's PSC 2023 Annual Report Shares Key Insights on Deficiencies & Trends of Ballast Water Management

Technical Newsletter as on 13 June 2024

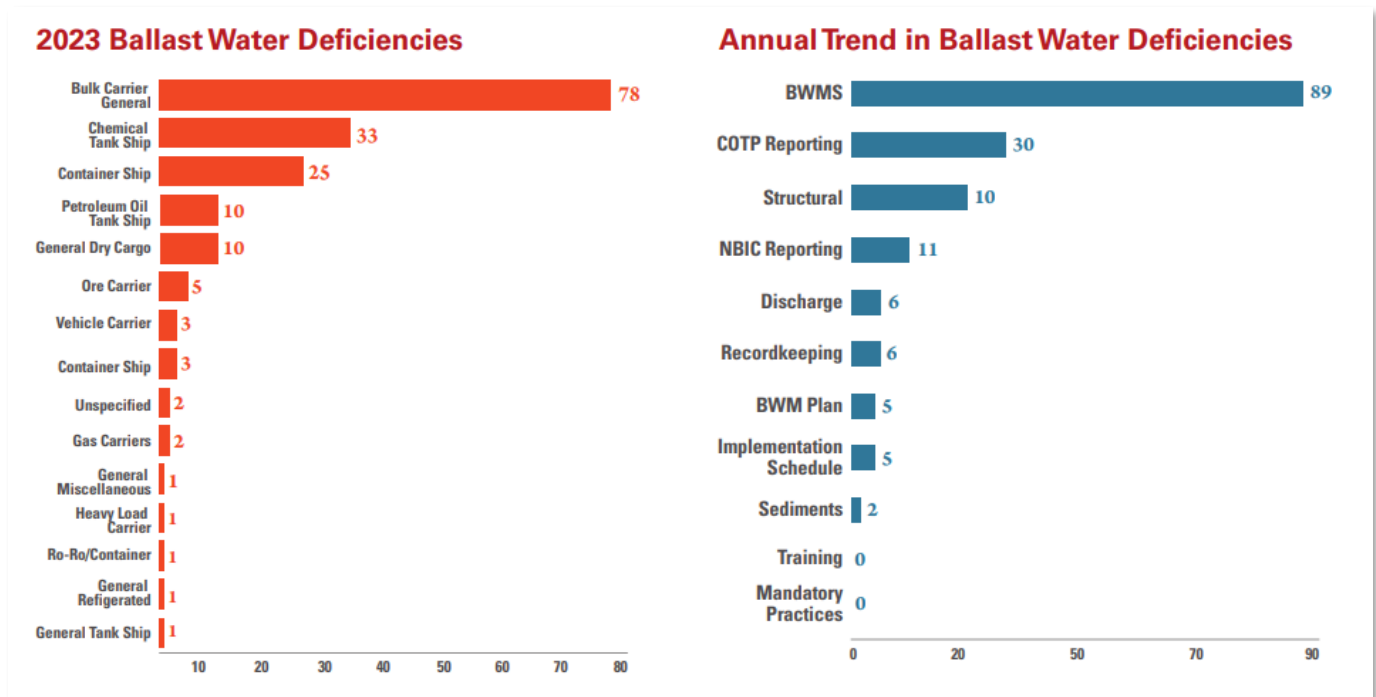
In 2023 alone, a total of **10,959** individual vessels, from **80** different flag administrations, called **81,854** US Ports, & **8,278** exams were conducted by the PSC. From these statistics one can get a sense of the pressing need for and importance of implementing and closely monitoring responsible practices to protect the ecosystems in which these vessels operate in.

Introduction

The 2023 Annual Report as issued by the Port State Control (PSC) division of United States Coast Guard (USCG) presents vital insights on last year's deficiencies issued for non-compliance with critical regulatory requirements / parameters for effective Ballast Water Management (BWM). Additionally, the report pointedly showcases the number of vessels (categorised by vessel type) that were issued BW deficiencies, as a means to indicate the most frequent non-compliers.

NEWSLETTER

Trend analysis of BWM deficiencies issued in 2023 by USCG's PSC



Graphs 1 & 2 as issued in USCG's PSC 2023 Annual Report (Source: <https://www.dco.uscg.mil/Portals/9/DCO%20Documents/5p/CG-5PC/CG-CVC/CVC2/psc/AnnualReports/annualrpt2023a.pdf>)

Understand why deficiencies are issued under certain critical parameters

- **BWMS:** Deficiencies issued include both inoperable Coast Guard Type Approved systems and accepted Alternative Management Systems.
- **COTP Reporting:** Deficiencies are issued when a vessel fails to report an inoperable system to the USCG.
- **Discharge:** Deficiencies are issued when a vessel discharges non-compliant ballast water.
- **Implementation Schedule:** Deficiencies involve vessels that are past their compliance date and using an unapproved BWM method.
- **Mandatory Practices:** Deficiencies include failures to remove hull fouling organisms and marine growth as well as improper uptake of ballast water.
- **Structural:** Deficiencies record failures in ballast water tanks and associated piping.

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admin@maritec.com.sg



+65 62718622



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Other key highlights:

- 29% less deficiencies were issued in 2023 as compared to the previous year.
- Concerns still lie in the significant increase seen in structural deficiencies, which indicates that vessel operators will need to evaluate the ship's maintenance and surveys to identify the structural inadequacies.
- The decline in BWMS deficiencies in 2023 shows the value of the Enhanced Examination Program (EEP) that was conducted in 2022.
- It is believed, the EEP contributed to identification of more discharges of non-compliant ballast water into the waters of the United States as well as showing an increase of non-reported inoperable ballast water systems.
- Plans to conduct more EEP exams are upcoming.

Summary of important elements of EPA's Vessel General Permit (VGP) 2013

(The VGP is the current mandatory regulatory requirement for Discharge Water Compliance for vessels operating in US waters)

- The final 2013 VGP is a permit issued by the U.S. EPA that regulates the discharges incidental to the normal operation of commercial vessels greater than 79 feet in length.
- The final 2013 VGP covers 27 specific discharge categories that were contained in the 2008 VGP, and also provides coverage for fish hold effluent in the event that a permitting moratorium expires.
- The final 2013 VGP aims to protect the quality of the U.S. waters by imposing effluent limits, best management practices, and monitoring requirements for various types of vessel discharges - primarily by enforcing frequencies at which annual testing of BW (depending on the BW system type) must be conducted, official reporting requirements and record keeping, among several other stipulations.

The following will provide you access to:

- The [Final VGP 2013](#) document
- A [Fact Sheet](#) (Provides the technical basis for the derivation of VGP requirements.)

CTI-Maritec provides 'VGP Annual Programme' services, a unique one-stop solution to meet all your Discharge Water Compliance requirements as per VGP 2013. Benefit from:

- **Risk Mitigation:** We assist clients monitor and identify Testing Frequencies for every contracted vessel in accordance with the VGP.
- **Budget Control:** We monitor vessel voyages to select the most economical ports for sampling/testing.
- **Global Network:** We offer testing worldwide for convenient sampling and reporting.
- **Technical Support:** We offer Audit & Crew Training and due-diligence support for vessel operational records review.
- **Error Proof Processes:** Our mindfully designed programme ensures all layers of requirements are systematically met before submission to EPA.
- **Annual Reporting Support:** We can provide expert support for the Annual Report preparation and submission on the EPA website
- **Quick-response Times:** Our dedicated personnel provide query management support on a real-time basis.
- **Reduced Superintendent (SI) Workload:** Our un-matched expertise in managing the administrative end-to-end requirements of the VGP alleviates a SI's workload, allowing for better focus on decision making.

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