

Measures to be Taken by Ships to Prevent Sea Pollution

Although 80% of the global marine pollution is caused by coastal facilities, the ratio of ship-source pollution is 20%. Ship-source marine pollution constitutes a problem not only for Turkiye, but also for international area. There are international conventions signed in this direction and Turkiye is a party to most of them.



We can group these conventions under two main headings.

- a. IMO conventions, Marpol 73/78, OPRC 90, CLC92, FUND 92 as International Conventions
- b. Convention on the Protection of the Black Sea Against Pollution (Bucharest Convention), Convention on Transboundary Transport of Hazardous Wastes and Control of Disposal (Basel Convention), Protection of the Mediterranean Against Pollution (Barcelona Convention) as Regional Conventions

In order to control illegal discharges from ships: The Ministry of Transport, Maritime Affairs and Communication has delegated its authority to the Coast Guard Command and Istanbul, Kocaeli, Antalya and Mersin Metropolitan Municipalities under the Circular dated 06/06/2011 with the number 2011/9. This Circular covers the organizations and institutions authorized for the Ministry for detecting ship-sourced marine pollution, jurisdiction, authority of these institutions and organizations, inspecting whether the provisions of the Environmental Law Nr. 2872 are complied in the marine jurisdictions subject to Turkish jurisdiction, administrative sanctions to be imposed against the violations detected, methods of continuous control and surveillance on air, land and sea and methods of notifying the Ministry of the operations performed within the frameworks of the delegation of power.

According to the legislation; all passenger ships traveling out of the port, oil tankers of 150 GRT and above, ships of 400 GRT and above and each ship carrying 15 or more crew members are obliged to report waste notification.



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Waste notifications which must be made through the Ship Waste Tracking System (SWTS) are made to the waste receipt officer concerned or to the Harbour Master by the ship's owner, operator or authorized agent at least 24 hours prior to the arrival of the ships at the port and as soon as the ships leave the port of departure for the short voyages that will last less than 24 hours.

The amount of the wastes accumulated on board and possible marine pollution that may be caused from them increases in direct proportion with the age of the ship, the type of ship and her engine, fuel consumption, the number of people on board, the cargo she carries and the steaming / harbour stay time.

When we examine the ship-sourced marine pollution in terms of insurance; most of the penalties subject to claim notification are caused by

- * Discharging bilge, ballast, hold or tank washing waters into the sea,
- * Disposal of garbage and solid wastes into the sea,
- * Discharge of the detergent water used for washing the deck or overflowing ballast water into sea together with oil/fuel and residues remaining on the overflow trays.
- * Scraping and painting of the ship's board to the extent that they pollute the sea,
- * Spillage of cargo residues into the sea,
- * Fuel overflowing into the sea as a result of overflow, leakage or connection/hose puncture due to accidental or human error during fuel transfer or loading-unloading of fuel as cargo,
- * Oil / fuel mixed into the engine cooling water system and flow into the sea with cooling water,
- * Oil leaking from the stern tube and steering rod,

- * Breaking of hydraulic hose and connections on the deck and discharge of flowing oil to the sea through open scuppers,
- * Discharge of bilge water over 15 ppm to the sea in sensitive sea areas,
- * Delivering sewage water directly to the sea without being treated in the incinerator,
- * Fuel leakage to the sea as the result of damaging of the fuel tanks due to collision / contact,

It is of vital importance both to reduce operational failures arising from these reasons and to complete certifications. In the simplest terms, mismatch between the record on the Oil and/or Garbage Record Book and actual oil and garbage quantity on board (Misrepresentation) and/or disposal of cargo improperly, would be subject to pollution fines.

So, what are the measures that can be taken to avoid serious obligations and high fines that may even lead to arrest?

- * Smooth operation of oil separator (OWS), alarm and automatic stop system, not bypassing them,
- * Keeping the Oil Record Book correctly,
- * Keeping the Garbage Record Book correctly, separating and collecting garbage in accordance with the Garbage Regulations, obtaining an receipt certainly for wastes delivered at land,
- * Correct disposal and correct documentation of cargo wastes,
- * Oil Pollution Emergency Prevention Plan (SOPEP) must be up-to-date,
- * All oil pollution-related certificates on board, (Oil Pollution Prevention, Sewage Pollution Prevention, Dangerous Goods, Air Pollution, Engine Air Pollution Prevention, Anti-fouling, OWS, 15 ppm alarm, Oil discharge monitoring and control system, Oil / water interface detector, Sewage treatment or comminuting system, Incinerator, Exhaust gas treatment system Sox and Nox,



- * Ballast water treatment system etc.) must be complete and valid,
- * Oil / fuel filtering equipment, 15 ppm alarm system and standard shore connection must be working and in good condition,
- * Oil / fuel / water detectors, tank / hold washing systems, ODME and load / ballast discharge systems, load heating systems, ventilation must be working and in good condition especially for tankers,
- * Sewage water treatment system, holding tanks, their system and equipment, discharge connections must be working and in good condition,
- * If the incinerator is available, it must be working and in good condition and its records are kept properly,
- * Correct separation and storage of garbage, all appropriate signs and labels to be full and complete,
- * Filling the Ballast Water Management Plan and Ballast Registry Book actually and completely,
- * Keeping all scuppers on the deck closed,
- * All vent pipe valves and fuel overflow trays must be working and in good condition,
- * Existing material in the Oil Spill Kit should be in proper quantity and in good condition,
- * Pollution drills that comply with the Flag State rules must be performed.

As it is known, our ships are subject to different inspections in domestic and foreign ports' calls. Considering that the method and frequency of these inspections vary depending on the port called, it is obvious that passing from these inspections successfully as a merchant by minimizing the risks and ensuring the smooth continuation of the trade is a gain not only for the

ship owner / operator, but also at the national level. It will be a national pride for us to increase the standards of Turkish ships and fleets and to successfully pass from the inspections they are subject to in domestic and foreign ports.

Note:

You can access the notification on administrative fines to be imposed under the environmental law numbered 2872 published in the Official Gazette by the Ministry of Environment and Urbanization; from the link below.

<https://www.resmigazete.gov.tr/eskiler/2019/12/20191231-17.htm>

