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## **ESSF on PRF - Port comments to the draft guidelines**

Further the discussions on 23<sup>rd</sup> February 2015 at the ESSF Sub-Group on Port Reception Facilities (PRF). In relation to **waste management** in ports, Danish Ports pays a particular attention to the following issues in the PRF guidelines:

The dates of the enforcement of the 2011 IMO resolution are an unfinished topic. According to the 2011 resolution, discharge of sewage from passenger ships within a special area would be prohibited from 1 January 2016 onwards for new passenger ships, and from 1 January 2018 for existing passenger ships. These dates cannot be met any longer. The new dates discussed are 1 June 2019 and 1 June 2021, respectively.

### **Generally speaking**

To the knowledge of Danish Ports there has been no complaints about inadequate reception facilities in the Danish ports. In general, the delivery and the reception of waste in Danish ports functions without greater complications. From time to time discussions about the payment arises, but many ships deliver more waste than they have generated since last port of call and are willing to pay for it, because of the flexibility of the Danish waste reception schemes.

### **Guidelines: 2. Definitions, page 5**

Danish Ports acknowledges that ports must have reception facilities for sewage from ships, including cruise ships. There are three issues concerning sewage PRF that particularly concern Danish Ports.

Firstly, if both black water and grey water will be delivered at the port of call, we are talking about quite considerable amounts of sewage. Part of the sewage is picked up by liquid bulk trucks, but gradually more and more ports have invested in quay sewerage systems for the reception of sewage. Only obstacle is that the rest of the public sewerage system can not receive the waste water in the quantities and with the adequate pressure, that is necessary to keep up an efficient vessel operation. It is a question of supply and demand. But experiences on this



matter are not many due to the fact, that not many ships demand to deliver the sewage today.

Secondly, there is an issue concerning the payment of the service. The guidelines definitions mentions "Ship-generated waste Shall mean all waste, including Sewage" (page 5). When it comes to cruise ships, these vessel types carry quite dramatic sewage amounts. Therefore a special Danish practice has been developed in cooperation with local waste facility offices' and almost more importantly with the cruise shipping companies' acceptance. It consists of a pro rata calculation, where the passengers are being calculated as "cargo". This means that there are no port charges concerning the passing of the portion of the waste water, belonging to the crew, while there is a port charge for the part originating from the passengers. For example, if there are 2,000 crew members and 3,000 passengers aboard, the ship's charges covers the delivery of 3/5 of the waste water in total. This practice should continue.

Thirdly, Baltic Marine Environment Protection Commission (HELCOM) communicated the following on 6<sup>th</sup> March 2015: "...However, the effective application of this already existing legal status is subject to the availability of adequate sewage Port Reception Facilities (PRF) in the region. The adequacy of sewage PRF has to be separately notified to IMO MEPC and this can be done jointly or individually by the coastal countries. The dates of the enforcement of the 2011 IMO resolution are an unfinished topic. According to the 2011 resolution, discharge of sewage from passenger ships within a special area would be prohibited from 1 January 2016 onwards for new passenger ships, and from 1 January 2018 for existing passenger ships. These dates cannot be met any longer. The new dates discussed are 1 June 2019 and 1 June 2021, respectively."

#### **Guidelines: Article 7, Annex 3, page 16**

The question of prior notification is rather interesting. How will it play along with the requirement that, from 1<sup>st</sup> June 2015, will be included in the SafeSeaNet. We have discussed this with Defence Command Denmark (Naval Staff) amongst others. Waste reception in port follows the municipal requirements to waste and therefore varies from port to port. This makes it difficult to put on formula. Danish Ports has therefore proposed that SafeSeaNet will link directly to the port reporting form so that the ship does not experience two different requirements. In fact three different requirements as the Danish rules and waste management/sorting are not in accordance with MARPOL regulations, as is also stated elsewhere in the meeting the material for the first meeting 23<sup>rd</sup> February 2015 at the ESSF Sub-Group on Port Reception Facilities (PRF).

#### **Guidelines: Article 5, page 33**

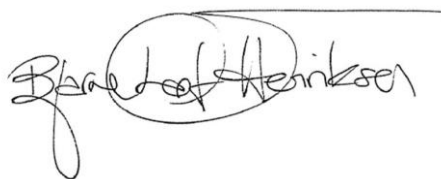
Concerning the issue of waste management plans (also addressed in 2.0. Applicability and coverage), Danish Ports express satisfaction with the suggested model, where there is no formal requirement for the plan design but for the

content and functionality. It is an administrative burden for ports to prepare and update the waste management plans and therefore it is important that they can be used directly in the communication with the ports' customers. One should consider whether it is necessary to change plans every third year if there has been no substantial changes. Consider whether it would not be sufficient if ports prepare a new plan when actually substantial changes occur. It would reduce the administrative burdens in several stages (see also the evaluation report page 36). It is also noteworthy that the survey shows, that waste plans provide the most value for authorities, while only just under half of the ports and a quarter of the customers believes that waste plans adds any value. It may well give rise to considerations whether the authorities should put too much pressure on the development on these plans.

### **No mentioning of port charges**

The guidelines does not discuss in many words the port charges. In general, Danish ports approve the practice concerning no special fee, but this requires a common understanding of the quantities and the waste received in the ports in our vicinity, so that waste reception does not become a competitive factor. Therefore, the discussion of how little or how much waste ships may carry from port to port is not only a discussion about how much unused capacity they need (Methods for Calculating whether there is sufficient dedicated storage...", page 13), but more an discussion on how much waste the vessel has accumulated since the last port of call. But of course, it should also make economic sense that ship owners should not just deliver a drop here and there. It makes sense that ship sewage is managed in certain volumes. There just has to be a balanced understanding, and ships must be willing to pay for parts of the waste delivery, when the volumes are larger than what the ship has generated since the last port of call.

Yours sincerely,

A handwritten signature in black ink, reading "Bjarne Løf Henriksen". The signature is written in a cursive style and is positioned below a horizontal line.

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