



# RUSSIAN MARITIME REGISTER OF SHIPPING

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**CIRCULAR LETTER**

**No. 381-13-1670c**

dated 29.11.2021

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Re:

amendments to the Rules for Technical Supervision during Construction of Ships and Manufacture of Materials and Products for Ships, 2021, ND No. 2-020101-139-E in connection with coming into force of IACS Unified Requirement (UR) Z17 (Rev.16 Aug 2021)

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Item(s) of supervision:

service suppliers

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Entry-into-force date:

**01.01.2022**

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~~Cancels / amends / adds Circular Letter No.~~

~~dated~~

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Number of pages: 1+5

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Appendices:

Appendix 1: information on amendments introduced by the Circular Letter

Appendix 2: text of amendments to Part I "General Regulations for Technical Supervision"

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Director General

Konstantin G. Palnikov

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Text of CL:

We hereby inform that the Rules for Technical Supervision during Construction of Ships and Manufacture of Materials and Products for Ships shall be amended as specified in the Appendices to the Circular Letter.

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It is necessary to do the following:

1. Bring the content of the Circular Letter to the notice of the RS surveyors, interested organizations and persons in the area of the RS Branch Offices' activity.
  2. Apply the provisions of the Circular Letter when performing technical supervision of service suppliers requested for survey on or after 01.01.2022.
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List of the amended and/or introduced paras/chapters/sections:

Part I: Table 9.1.1, paras 9.2.7.4, 9.2.7.16, 9.3.19 and 9.3.20

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**Information on amendments introduced by the Circular Letter  
(for inclusion in the Revision History to the RS Publication)**

Nos.	Amended paras/chapters/ sections	Information on amendments	Number and date of the Circular Letter	Entry-into-force date
1	Table 9.1.1	Kind of activity for code 22027000 has been specified. New kind of activity with code 22028000MK has been introduced	381-13-1670c of 29.11.2021	01.01.2022
2	Para 9.2.7.4	Requirements for files of the firm documents have been specified	381-13-1670c of 29.11.2021	01.01.2022
3	Para 9.2.7.16	New para containing requirements for files of the firm documents has been introduced	381-13-1670c of 29.11.2021	01.01.2022
4	Para 9.3.19	Kind of activity has been specified considering IACS UR Z17 (Rev.16 Aug 2021)	381-13-1670c of 29.11.2021	01.01.2022
5	Para 9.3.20	New para containing requirements for kind of activity with code 22028000MK has been introduced considering IACS UR Z17 (Rev.16 Aug 2021)	381-13-1670c of 29.11.2021	01.01.2022

## **RULES FOR TECHNICAL SUPERVISION DURING CONSTRUCTION OF SHIPS AND MANUFACTURE OF MATERIALS AND PRODUCTS FOR SHIPS, 2021,**

### **ND No. 2-020101-139-E**

#### **PART I. GENERAL REGULATIONS FOR TECHNICAL SUPERVISION**

##### **9 RECOGNITION OF SERVICE SUPPLIERS**

- 1 **Table 9.1.1.** Kind of activity for **code 22027000** is replaced by the following text:  
"Watertight cable transit seal systems inspection on ships and offshore installations".
- 2 **Table 9.1.1.** New kind of activity with **code 22028000MK** is introduced reading as follows:  
"Commissioning testing of Ballast Water Management Systems (BWMS)".
- 3 **Para 9.2.7.4** is replaced by the following text:  
".4 for categories of firms that require certification from manufacturers, manufacturer's documentary evidence that the firm has been certified or licensed to service the particular makes and models of equipment for which recognition is sought shall be provided;".
- 4 **New para 9.2.7.16** is introduced reading as follows:  
".16 operators/technicians/inspectors documentation they have acknowledged the Code of Ethics to conduct the relevant activity;".
- 5 **Para 9.3.19.** The title is replaced by the following text:  
"**9.3.19 Requirements for firms engaged in cable transit seal systems inspection on ships and offshore installations (code 22027000).**".
- 6 **Paras 9.3.19.1 — 9.3.19.6.** The term "cable transit seal systems" is replaced by the term "watertight cable transit seal systems" throughout the para.
- 7 **New para 9.3.20** is introduced reading as follows:  
"**9.3.20 Requirements for firms engaged in commissioning testing of ballast water management systems (BWMS) (code 22028000MK).**  
**9.2.20.1** Extent of engagement.  
Sampling and analysis of ballast water and verification of the self-monitoring equipment during commissioning testing of ballast water management systems (BWMS), for statutory purposes.  
**9.2.20.2** Procedures.  
Service suppliers shall have documented procedures including:  
procedures for sampling collection and handling, analysis, assessment of BWMS correct operations and documenting and reporting. The procedures shall outline how the ballast water sampling and analysis is conducted with respect to each size class of organisms;  
operating procedures for the ballast water test equipment specified including calibration, adjustment and maintenance.

**9.3.20.3** Service suppliers shall be familiar with the BWMS operation including features and limits of each treatment technology, and self-monitoring parameters.

**9.3.20.4** Service suppliers shall be accredited to relevant standards such as ISO/IEC 17025 or equivalent, as applicable.

**9.3.20.5** Service suppliers shall be independent of the BWMS manufacturer or supplier including shipyards.

**9.3.20.6** Operators.

Operators shall have adequate knowledge to perform the biological sampling and assessment of self-monitoring parameters. The firms have responsibility for document that the requirements to the operator are satisfied.

**9.3.20.6.1** Operators who conduct commissioning testing shall:

demonstrate knowledge in the use of different ballast water testing equipment for the purpose of assessing biological efficacy;

have documented evidence of sufficient engineering and biological knowledge to conduct the commissioning testing;

have knowledge of IMO BWM.2/Circ.70/Rev.1, as may be amended "Guidance for the Commissioning Testing of Ballast Water Management Systems" and IMO BWM.2/Circ.42/Rev.2 "Guidance on Ballast Water Sampling and Analysis for Trial Use in accordance with the BWM Convention and Guidelines (G2)", as may be amended;

(\*) be trained in the proper use of portable indicative analysis equipment. Review of training records and/or interviews shall be conducted to confirm the equipment shall be properly used during testing;

(\*) be familiar with and understand the design concepts of the Guidelines G2 sampling devices installed on the ship's water ballast system. Personnel shall understand the need to maintain the G2 sampling devices clean and free of contaminants and the importance of controlling the ballast water sample flow rates from the G2 device (to avoid organism mortality in the sample);

(\*) be familiar with the technologies utilized by the indicative sampling equipment and understand water quality issues that are both conducive to successful use of the equipment and circumstances that may challenge the use of the equipment;

(\*) be trained in the proper disposal procedures for water samples following testing;

(\*\*) have knowledge of the system design limitations of the BWMS (as stated in the BWMS type approval certificate) and knowledge of the BWMS self-monitoring parameters, such as flow rate, pressure, TRO concentration, UV transmittance/intensity, etc., and how the BWMS notifies the operator in case he operates BWMS outside its system design limitations. This knowledge is relevant for evaluating whether the self-monitoring equipment of the BWMS indicates correct operation of the BWMS. In case operator is not present during ballasting operations, he/she shall have knowledge of how to access the BWMS log to evaluate that the BWMS operated correctly during ballasting operations;

(\*\*) have the procedures and knowledge to be able to assess the applicable self-monitoring parameters (e.g., flow rate, pressure, TRO, UV intensity (UVI), etc.) of the BWMS, taking into account the system design limitations of the BWMS;

Notes: 1. The points marked with (\*) are qualifications for operators performing sampling and analysis of ballast water.

2. The points marked with (\*\*) are the qualifications for operators performing verification of the self-monitoring equipment.

3. The points above without symbol are the common qualifications for operators.

**9.3.20.7** Equipment and facilities.

**9.3.20.7.1** Equipment, procedures and methods for detailed analysis, where applicable, shall be in accordance with relevant international standard and/or accepted industry standards. Laboratories conducting sample enumeration shall be accredited to ISO/IEC 17025 standard, or equivalent.

**9.3.20.7.2** Testing shall be conducted using indicative analysis equipment accepted by the Register. Information and reference to the acceptance documents for the equipment used shall be submitted to the Register in the report which includes the results from the commissioning test as per IMO BWM.2/Circ.70/Rev.1, as may be amended. In case the indicative analysis equipment

used has not been previously accepted by the Register, the following information shall be submitted:

- equipment information — type, model, technology used, evidence of calibration, detection range, organism type/size classes that can be analyzed;

- test results conduct for the verification of accuracy, detection range and repeatability;

- certificate of standards, if available.

**9.3.20.7.3** For indicative analysis equipment planned to be used, the equipment manufacturer's instruction manuals shall be available. The manuals shall include, at least, clear guidance for the proper storage, handling, operation, maintenance, repair, and calibration.

Note. Each firm applicant shall present the surveyor their confidential internal procedures for conducting the indicative testing. For all equipment planned to be used, the instruction manuals shall be available.

**9.3.20.7.4** The service supplier shall use specialty devices (e.g., sieves, screens, etc.) to separate the different organism sizes classes (i.e.,  $\geq 10 \mu\text{m}$  to  $< 50 \mu\text{m}$ , and  $\geq 50 \mu\text{m}$ , and indicator microbes) to support analysis of each size class.

**9.3.20.7.5** Equipment used for the analysis of other physical-chemical water parameters shall be suitable for the intended use.

**9.3.20.7.6** Indicative analysis equipment shall be properly stored or transported to avoid damage and disturbance to calibrations, etc. when transporting from the service supplier's facilities to the ship.

**9.3.20.8** Sampling and analysis.

**9.3.20.8.1** The firm shall follow relevant guidelines on sampling of ballast water. A standard operating procedure shall be defined for sampling of uptake water. Discharge sampling shall follow the IMO's "Guidelines for Ballast Water Sampling (G2)".

**9.3.20.8.2** The representative samples shall be analyzed as a minimum for the two size classes of organisms, namely  $\geq 50 \mu\text{m}$  and  $\geq 10 \mu\text{m}$  to  $< 50 \mu\text{m}$ , specified in IMO Circular BWM.2/Circ.70/Rev.1 "Guidance for the Commissioning Testing of Ballast Water Management Systems" using indicative analysis methods. Detailed analysis of all organism type/size classes or combination of detail and indicative analysis can also be performed.

**9.3.20.8.3** Service suppliers shall maintain a record of:

- operation of the BWMS during test period, including any recorded data or operator observations associated with the performance deviations, alarms or abnormal/unexpected operations;

- applicable self-monitoring parameters.

**9.3.20.8.4** In case the commissioning testing requires the service supplier's personnel to work in hazardous areas (e.g., pump room for tankers, etc.), the service supplier shall either have equipment certified for the spaces or provide the surveyor with a list of ships for which they shall not be able to conduct testing.

**9.3.20.9** Reporting.

Service suppliers shall provide reports detailing the results of sampling and analysis of ballast water and assessment of self-monitoring parameters during commissioning testing. The format shall be acceptable to the Register. The report, as a minimum, shall contain the following:

- manufacturer's name;

- model name;

- BWMS technology limiting operating conditions and system design limitations;

- operation required, e.g., ballasting, de-ballast, circulation, one pass, in tank, etc.;

- treatment rated capacity (TRC) in  $\text{m}^3/\text{h}$ ;

- relevant performance parameters (e.g. TRO, UV dose, UVI, flow rate or other relevant performance parameter);

- alarms developed during operation;

- installation location;

- Type Approval Certificate (CTO) (issued by and No);

- date installed;

- results of sample analysis;

- pump flow rate, ballast tanks and volume;

- comments/options: filter and other major components, additional equipment for process measurements.

**9.3.20.10** Reference documents.

The service supplier shall have access to the following documents, as may be amended:

IMO Resolution MEPC.300(72) "Code for Approval of Ballast Water Management Systems (BWMS Code)";

IMO Resolution MEPC.173(58) "Guidelines for Ballast Water Sampling (G2)";

IMO Circular BWM.2/Circ.42/Rev.2 "Guidance on Ballast Water Sampling and Analysis for Trial Use in accordance with the BWM Convention and Guidelines (G2)";

IMO Circular BWM.2/Circ.70/Rev.1 "Guidance for the Commissioning Testing of Ballast Water Management Systems";

IMO Circular BWM.2/Circ.61 "Guidance on Methodologies that may be used for Enumerating Viable Organisms for Type Approval of Ballast Water Management Systems";

IMO Circular BWM.2/Circ.69 "Guidance on System Design Limitations of Ballast Water Management Systems and their Monitoring";

IMO Resolution MEPC.279(70) "2016 Guidelines for Approval of Ballast Water Management Systems (G8)";

IMO Resolution A.1120(30) "Survey Guidelines under the Harmonized System of Survey and Certifications (HSSC), 2017 (for BWMS that were type approved to the 2016 G8)".