**Note:** The record of discussions following this question towards a recommendation can be viewed under [www.mared.org](http://www.mared.org) “Recommendation Tracking”

**The issue addressed below has been discussed by MarED HC 37 and is published “for consideration” by MED stakeholders.**

Origin of the question: Question from Manufacturer

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| **Reference:**  Directive 2014/90/EU  Article Sewage Systems  Annex 2018/773  Item No. 2.6  Regulation/Standard MARPOL 73/78 Annex IV, Reg 9 (IMO Res. MEPC.227(64)) |
| **Key words :**  Sewage Treatment Plants (STP) Technical Lay-out, Dilution, Sludge and Chlorination |

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| **Text/Explanations:**  Reportedly the approval procedures for Sewage Systems are open for interpretation. The MARPOL Convener has received several questions from a European Maker who is questioning MED Approvals issued by various Notified Bodies for Other Makers.  The questions are among other related to   * The existing POL-010 ( Grey Water Connection to final stage) * Claims from makers that their Sewage Systems are free from sludge, and accordingly no sludge/sediment discharge is existing, and or required) * Recirculation of effluent from Sewage System to Mixing Tank, allowing for “improved” results of the outgoing effluent * Chlorination system, without dechlorinating, which will positively affect the laboratory test results.   The questions appear to be valid, as reportedly the approval processes used, and the samples taken for the laboratory tests may not be covering exactly the requirements of the Resolution. On the other hand the Resolution is a guideline on the implementation of effluent standards, and how performance tests should be carried out. The Resolution is not a technical guidance on how a sewage system must be designed, and is not prescribing its lay-out.  It is obvious that the approval of the Sewage System should be carried out according to the Resolution, and that the system tested in the manufacturer’s workshop, and or in the testing laboratory should be identical to the systems which will be placed on board. Accordingly without additional re-circulation connections and or additional arrangements for dilution (which may affect the test results) Same applies to the fact that the chlorinating should be stopped by dechlorinating to stop further chlorination in the sample bottle (which will result into a better performance of the sewage system than the sewage system installed on board)  The above comments are received from one manufacturer, it is anticipated that similar questions, comments may be available from other manufacturers, however not yet received by the MARPOL Group.  It appears that Notified Body’s the MEPC 227(64) gives room for interpretation of the performance tests, and that the attending inspector should be very well aware of the possibilities of the manufacturer to “improve” the outcome of the performance tests.  **Question raised**:  Is the MARED Horizontal Committee the place to solve the above issues, the above concerns are after all raised by a manufacturer of a sewage plant who is wondering if other plants may have obtained MED approval not fully in accordance with the intention of the MEPC 227(64) |

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| **Recommendation** :  No, the MARED horizontal commission is not the place to solve this issue, as it may result into an avalanche of claims that equipment manufactured by other makers is not fully in compliance with the resolution. If makers have clear grounds to dispute the MED approval of other manufacturers they should approach their respective flag, who may accordingly start an investigation, and or forward the comment to COMMS  This question should however be considered as a reminder to all Notified Bodies involved in MED Type examination of Sewage Systems, to properly carry out drawing review and to confirm that the approval process is indeed carried out in accordance with the requirements of the Resolution. |