

MEMO OF THE SECOND INFORMAL CONSULTATION WORKSHOP ON DISCHARGES FROM TANK WASHING ON CHEMICAL TANKERS (IC WS DISCHARGES 2-2025)

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The second informal consultation workshop on discharges from tank washing on chemical tankers (IC WS DISCHARGES 2-2025), was held in Gothenburg, Sweden, and online on 16 May 2025.

The workshop was co-hosted by Finland and Sweden and organized in cooperation with Coalition Clean Baltic (CCB), the John Nurminen Foundation (JNF) and EUSBSR PA Ship.

Information for the workshop was shared on a dedicated event page at [CCB's website](#) as well as on the on the IC WS DISCHARGES 2-2025 [session site](#).

The Workshop was moderated by Mikhail Durkin, Executive Secretary, Coalition Clean Baltic (CCB). Ms. Katarina Viik, HELCOM Professional Secretary and Ms. Marta Ruiz, Associate Professional Secretary acted as secretaries of the Workshop

The List of Participants is contained in **Annex 1**.

Welcome words

The Workshop was welcomed by the Chair of the Maritime Working Group, Susanne Heitmüller. Mikhail Durkin introduced the programme and structure of the Workshop.

Presentations

The Workshop took note of a presentation by Juulia Suikula, John Nurminen Foundation, on ongoing work to reduce the discharges of tank washing waters in the Baltic Sea (**Presentation 1**). In particular, the Session welcomed the “Baltic Chemical Tanker” project, which is open for all HELCOM Contracting Parties to join. The project aims to start in autumn pending on availability of funding.

The Workshop took note of a presentation by Erik Stålnacke, Swedish Coastguard, on observations of discharges of tank washing waters containing biobased oils in the Baltic Sea, and, in particular, in Marine Protected Areas (MPAs) in Sweden (**Presentation 2**). The Workshop noted that one of the conclusions of the work conducted is that the current IMO regulations, particularly those under MARPOL Annex II, are not sufficiently strict to meet the objectives of the EU regulations related to the protection of sensitive marine species and habitats.

The Workshop noted that there is no information available on discharges occurring outside MPAs that may nonetheless affect them, due to the long distance that the pollutants can travel.

The Workshop took note of a presentation by David Langlet, Uppsala University, on a legal analysis of Sweden's rights and responsibilities to prevent or reduce pollution of protected areas (**Presentation 3**). It is expected that the report on this work will be available in autumn this year.

The Workshop noted two recent cases involving vessels sailing without displaying a flag in the Baltic Sea. The Workshop discussed the legal implications of such situations and considered the challenges that arise when the flag State cannot be identified. It was noted that, under international law, the flag State bears primary responsibility for a vessel and exercises associated rights. In the absence of a flag, a vessel does not benefit from the protections typically afforded under the jurisdiction of a State. Consequently, it may be subject to intervention by other States. The Workshop further noted that any such intervention must remain consistent with the principles of necessity and proportionality, e.g, regarding the safety of individuals on board.

The Workshop took note of an introduction by Jyrki Vähätalo, Traficom, of an evaluation of the volumes and impact of discharges of noxious liquid substances in tank washing waters for the period 2020-2024 which is available through this [link](#).

The Workshop noted concerns regarding the composition of benzene mixtures, highlighting frequent non-compliance with regulatory requirements and the elevated pollution risk posed by substances such as pyrolysis gasoline. The Workshop recalled that Chapter 16 of the IPC Code mandates assessments based on the most hazardous component in mixtures, supported by proper documentation and analysis, yet compliance remains low. The absence of clear classification guidance for pygas further complicates enforcement.

The Workshop took note of a presentation by Tapio Kivilehto, MARPOL inspector, on inspection practices of tank washing in Finland (**Presentation 4**).

The Workshop noted the practical challenges in bringing tankers into compliance with required standards. It was observed that shipowners often face pressure due to tight timeframes, leading to quick tank cleaning operations and increased demands on crew. Where appropriate facilities, such as hot water systems, are available, shipowners have expressed willingness to cover associated costs, indicating a readiness to invest in solutions that facilitate compliance.

The Workshop took note of a presentation by Elin Malmgren, Swedish Environmental Research Institute, on tank washing and Clean Shipping Index (**Presentation 5**). The Index covers a range of operational areas, including grey water, sewage and black water, garbage and sludge handling, bilge water treatment, fuel restrictions, and the use of scrubbers, providing measurable criteria for shipping companies to improve environmental performance.

The Workshop took note of a presentation by Marta Ruiz, HELCOM secretariat, on HELCOM work on port reception facilities (PRFs) (**Presentation 6**), which detailed the status of work conducted in connection with PRFs in the frame of the Baltic Sea Action Plan.

Discussion

The Workshop considered the issues presented in the interventions and shared the following views grouped by topic.

On the topic of challenges related to the provision and use of PRFs for discharges from tank washing on chemical tankers, the Workshop noted inter alia the following proposals and comments:

- in some ports, suitable PRFs are not available, or the chemical properties of certain cargoes make tank pre-washing ineffective;
- although the number of PRFs may be sufficient in some areas, they are often operated by a single company (e.g. in the Netherlands), creating systemic vulnerability and reducing resilience;
- concerns were raised over practices such as heating tall oil to temporarily reduce its viscosity, thereby avoiding more thorough washing;
- the EU PRF Directive includes a wide range of infrastructure under the term “port reception facilities”, extending beyond delivery points to encompass also wastewater treatment systems, which adds to the complexity of regulation and coordination; and
- given the variety of stakeholders involved, effective implementation and oversight require enhanced cooperation between all relevant parties.

The Workshop considered the following possible solutions to improve the management of tank wash water and PRFs:

- invest in more efficient and advanced technologies for tank cleaning and wash water treatment;
- establish dedicated cleaning stations in ports equipped with hot water and reception facilities for tank washing water;
- encourage onshore handling of washing waters to enable recovery and reuse of residues, offering potential cost savings;
- allocate a portion of port fees to finance PRFs or integrate costs into the “no special fee” system;
- for certain cargo types, consider introducing exemptions from cleaning water related fees to incentivize proper disposal;

- designate the Baltic Sea as a Special Area under MARPOL Annex II to establish a legal framework for stricter discharge controls;
- increase the number of MARPOL inspectors to improve enforcement;
- support national legislation, such as Finland's inspections for Y-class cargoes, to ensure compliance with MARPOL Annex II discharge and prewash requirements at the national level;
- clarify and reinforce the responsibility of cargo owners for the proper handling and discharge of residues;
- strengthen the role of port authorities in PRF planning, monitoring, and enforcement of port reception facility obligations, including compliance with waste delivery, adequacy of facilities, and implementation of fee and reporting systems. Engage all relevant stakeholders, including port authorities, cargo owners, port planners, and commercial operators in the coordinated planning, provision, and oversight of port reception facilities for ship-generated wastewater, including tank wash water, and in ensuring compliance with applicable environmental and waste management regulations; and
- promote a "Clean Port Index" or similar initiative, building on the "Clean Shipping Index" model, where PRF availability becomes a key criterion under green or sustainable port programs.

Wrapping up and Memo of the Workshop

The Workshop thanked Finland, Sweden, CCB, and JNF for the hosting and excellent organization, and all the participants for active and productive discussions.

The Workshop took note that the memo of the workshop will be submitted to the fourth informal consultation session of HELCOM Maritime Working Group (IC WG MARITIME 4-2025), to be held on 28-30 October 2025, in Latvia, for consideration.

Annex 1 List of participants

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