

Lessons Learned LL2022 – 5001

MARPOL violation reminder



Type of Incident: MARPOL violation

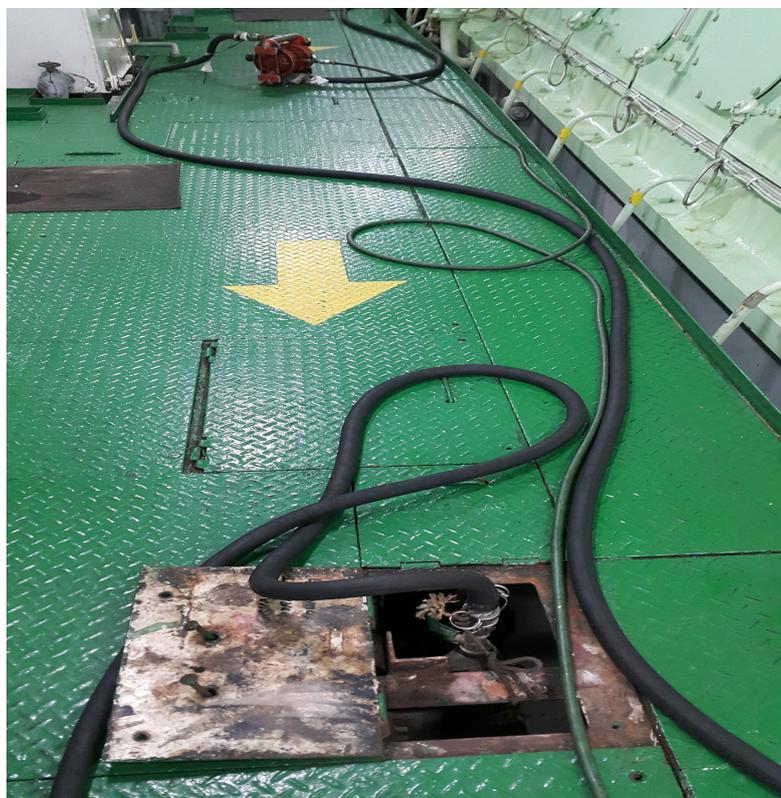
Short Description

This LL is to refresh our memory of very costly incidents in our recent past, with the aim to avoid any repetitions.

Description

Some years ago, some crew members came up with the idea to empty bilge water into the sewage tank and pump it overboard. Somehow, the activity was not mentioned in the Oil Record Book. The consequence was very costly. We were sentenced to more than one million USD, and 3 years of probation. We had to arrange additional inspections onboard some of the vessels and establish several new control routines. The Environmental Tag and Seal System being one of them.

On another vessel, during our second year of probation from this MARPOL violation, it seems that some crew members again came up with the idea to empty bilge water into the sewage tank and pump the contents overboard. (I write "seems", as there was never clearly established what had actually happened). Again, the venture was not mentioned in the Oil Record Book. The US authorities caught interest, and we spent thousands of working hours to convince them that nothing illegal had taken place.



As this second, alleged violation took place within the probation period, we could have been sentenced to millions of dollars. Our work to justify our case was largely successful, and

we were "only" sentenced to one additional probation year. But that was also costly.

Lots of water has passed under bridges since. And it may be that our institutional memory needs refreshing, thus this reminder to prevent similar incidents to happen again.

Causes (Immediate and Root Cause)

It is not easy to understand why the actual and alleged MARPOL violations took place. There is no problem to deliver bilge water to shore, need be.

Actions / recommendations:

We ask that the above incidents are discussed on board, with the aim that we never violate any regulation, being MARPOL or not.

- Evaluate reasons for why the involved personnel acted as they did.
- What could have been done to prevent this from happening?