



Technical Circular

No.: 011/2021

Date: 12th March 2021

Subject: Tecnicomar Ecomar Sewage Treatment Plants.

1. The United Kingdom Maritime and Coastguard Agency (MCA) has issued Safety Bulletin No. 18 regarding issues reported in relation to certain Sewage Treatment Plant (STP) types manufactured by Tecnicomar SPA, Italy.
2. Vide Bulletin No. 14, UK MCA had informed that in February 2019, MED certification approval was withdrawn for following Tecnicomar sewage treatment plant products.

Certificate Number and MED Module	Model	Specified Standard	Type Approval Certificate Validity
MED1550293 B	ECOMAR 20	MEPC.227(64), including para. 4.2	21/12/2020
MED1550294 B	ECOMAR 32	MEPC.227(64), including para. 4.2	21/12/2020
MED1550295 B	ECOMAR 45	MEPC.227(64), including para. 4.2	21/12/2020
MED1550296 B	ECOMAR 70	MEPC.227(64), including para. 4.2	21/12/2020
MED1550297 B	ECOMAR 145	MEPC.227(64), including para. 4.2	21/12/2020
MED1650019 B	ECOMAR 340	MEPC.227(64), including para. 4.2	13/01/2021
MED1650020 B	ECOMAR 545	MEPC.227(64), including para. 4.2	13/01/2021



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. While we have taken utmost care to be as factual as possible, readers/ users are advised to verify the exact text and content of the Regulation from the original source/ issuing Authority.

MED1650164 D	ECOMAR 6	MEPC.227(64), including para. 4.2	28/05/2019
	ECOMAR 6AC		
	ECOMAR 8		
	ECOMAR 8AC		
	ECOMAR 16		
	ECOMAR 24		
	ECOMAR 50		
	ECOMAR 120		
	ECOMAR 200		
	ECOMAR 20		
	ECOMAR 32		
	ECOMAR 45		
	ECOMAR 70		
	ECOMAR 145		
	ECOMAR 340		
ECOMAR 545			

3. An evaluation of risk assessment of the equipment has concluded that continuous use of the above affected ECOMAR STP models have the potential to pose a risk to the marine environment.
4. Ship owners/ operators and masters of ships installed with affected ECOMAR Sewage Treatment Plant (STP) are advised to be guided by above and accordingly contact the IRS Head Office at the earliest possibility so that a detailed corrective action plan can be developed and submitted to the Administration for their review and advice.
5. Meantime, where above affected ships are also provided with sewage holding tank, sewage is to be stored in the sewage holding tank and subsequently be discharged as per Marpol Annex IV requirements.

6. If no sewage holding tank is already designated, Owner/ operators are advised to forward their proposal designating tank for holding sewage. The manufacturer is also to be contacted to take corrective action for compliance to requirements.
7. In this respect, circular from Bahama flag providing guidance is also attached.
8. Ship owners/ operators and Masters of ships installed with affected ECOmar Sewage Treatment Plant (STP) are advised to be guided by above and ensure compliance.

Enclosure:

1. UK MCA Safety Bulletin No. 18
2. Bahamas Technical Alert 21-10, dated 19/02/2021.

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1. Home (<https://www.gov.uk/>)
 2. Cargo safety and safety alerts (<https://www.gov.uk/topic/ships-cargoes/cargo-safety>)
 3. Maritime and Coastguard Agency (MCA) Safety bulletins
(<https://www.gov.uk/government/publications/maritime-and-coastguard-agency-mca-safety-bulletins>)
- Maritime & Coastguard Agency (<https://www.gov.uk/government/organisations/maritime-and-coastguard-agency>)

Notice

Safety Bulletin 18 - Tecnicomar ECOMAR Range of Equipment

Updated 23 October 2020

Contents

1. Summary of issue
2. Actions to take
3. Further information

Annex. 1

[Print this page](#)



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Following the publication of Safety Bulletin 14, the MCA has completed a review of the ECOMAR range of sewage treatment equipment for which Marine Equipment Directive (MED) Certification was withdrawn and has concluded the impacted models do have the potential to cause harm to the marine environment.

1. Summary of issue

In February 2019, MED certification approval was withdrawn for certain Tecnicomar sewage treatment plant products (notification provided by MCA Safety Bulletin 14), a full list of which is provided in Annex 1.

An evaluation of risk assessment of the equipment has concluded that the impacted models have the potential to pose a risk to the marine environment, meaning that corrective action must be taken by the manufacturer (Tecnicomar S.p.A.) in order for the equipment to remain in use and not be removed from vessels. In response to the withdrawal of certification, Tecnicomar S.p.A. has gained certification from DNV-GL, on behalf of the Norwegian Administration, for an new range of equipment (ECOMAR-S range) and is currently seeking certification of an upgrade kit which would enable the impacted models to regain certification.

As the listed equipment remains uncertified, vessels that have the equipment onboard risk being unable to renew their Sewage Pollution Prevention Certification when their existing certificate expires. To maintain the validity of certification, shipowners and operators must liaise with their MCA Customer Service Manager (CSM) and Tecnicomar S.p.A. to agree and arrange for the replacement or upgrade of the non-compliant equipment.

2. Actions to take

If you have one of the listed models:

- Contact MCA CSM to notify them that you have one of the listed models onboard your ship
- Contact Tecnicomar S.p.A. to discuss and arrange upgrade or replacement of equipment
- Agree with MCA CSM steps to be taken whilst equipment noncompliance is addressed.

3. Further information

Further information can be obtained by contacting the equipment manufacturer.

Annex. 1

List of Tecnicomar ECOMAR Products for which MED Certification was Withdrawn by the Notified Body from 15 February 2019

Model	Specified Standard	Certificate Valid From	Certificate Valid Until
ECOMAR 20	MEPC.227(64), including para 4.2	22/12/2015	21/12/2020
ECOMAR 32	MEPC.227(64), including para 4.2	22/12/2015	21/12/2020
ECOMAR 45	MEPC.227(64), including para 4.2	22/012/2015	21/12/2020
ECOMAR 70	MEPC.227(64), including para 4.2	22/012/2015	21/12/2020
ECOMAR 145	MEPC.227(64), including para 4.2	22/012/2015	21/12/2020
ECOMAR 340	MEPC.227(64), including para 4.2	14/01/2016	13/01/2021
ECOMAR 545	MEPC.227(64), including para 4.2	14/01/2016	13/01/2021
ECOMAR 6 ECOMAR 6AC		29/05/2016	28/05/2019

Model	Specified Standard	Certificate Valid From	Certificate Valid Until
ECOMAR 8 ECOMAR 8AC ECOMAR 16 ECOMAR 24 ECOMAR 50 ECOMAR 120 ECOMAR 200 ECOMAR 20 ECOMAR 32 ECOMAR 45 ECOMAR 70 ECOMAR 145 ECOMAR 340 ECOMAR 545			

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Tecnicomar Ecomar Sewage Treatment Plants

1. Purpose

- 1.1. The purpose of this Technical Alert is to raise awareness of issues reported in relation to certain Sewage Treatment Plant (STP) types manufactured by Tecnicomar SPA, Italy.

2. Introduction

- 2.1. It was reported in February 2019 that a decision had been made to withdraw the Marine Equipment Directive (MED) type approval certification from certain ECOMAR STP produced by Tecnicomar. Details of affected units are provided in Annex I.
- 2.2. Further, as of October 2020 updated information has been circulated throughout the maritime industry advising that continuous use of the affected ECOMAR STP models is being potentially recognised as harmful to the environment.
- 2.3. **Therefore, with immediate effect, the Bahamas Maritime Authority (BMA) strongly advises against the use of any of the affected STP for discharge overboard of treated sewage in accordance with Regulations 11.1 and 11.2 of Annex IV of the International Convention for the Prevention of Pollution from Ships, 1973, as amended (MARPOL Annex IV).**
- 2.4. Continuous use of the affected STP may result in the competent authorities of a Coastal State imposing severe sanctions against the ship and her Master as such discharges may be considered a deliberate violation of the provisions of MARPOL Annex IV.

3. BMA Position

- 3.1. The BMA position regarding marine equipment installed on board Bahamian ships is outlined in [BMA Information Bulletin No. 71](#)¹.
- 3.2. Marine equipment installed on board during the term of validity of a Type Approval Certificate is considered accepted by the BMA.

¹ <https://www.bahamasmaritime.com/wp-content/uploads/2020/10/BMA-Bulletin-71-Approval-Certification-of-Marine-Equipment.pdf>

- 3.3. Use of installed type-approved equipment is not conditional on the continuous validity of its Type Approval Certificate. The equipment may be used continuously even if the Type Approval Certificate expires or may have been withdrawn by a certifying authority.
- 3.4. The BMA however retains the right to review and, where considered appropriate, restrict use of type approved equipment where objective evidence exists that the equipment may present a danger to the ship, her crew, maritime safety and security or be considered potentially harmful to the environment.
- 3.5. In such situations, specific case-by-case measures shall be agreed between the BMA and the Recognised Organisation that classes such ship to bring the performance of the affected marine equipment into compliance with the original approval standards. In exceptional cases the BMA may require the use of such marine equipment to be permanently terminated.

4. Actions required for ships fitted with Tecnicomar ECOmar STPs

- 4.1. Companies² operating ships which have an affected ECOmar STP installed shall contact the Recognised Organisation that classes the ship at the earliest possibility. A detailed corrective action plan should be developed and submitted to the BMA by the Recognised Organisation for review and acceptance. The plan shall include a list of proposed actions to bring the sewage treatment installation on board into full compliance with Regulation 9 of MARPOL Annex IV. Such actions may include:
- Installation of an upgrade pack by Tecnicomar to restore the Type Approval Certificate of the STP³; or
 - Installation of a different STP, new or refurbished, with a valid Type Approval Certificate. A new International Sewage Pollution Prevention Certificate (ISPP) initial survey will need to be completed, and an amended ISPP Certificate issued; or
 - Removal of STP and fitting the ship with a suitable sewage holding tank in compliance with Regulation 9.3 of MARPOL Annex IV. A new ISPP initial survey will need to be completed, and an amended ISPP Certificate issued.
- 4.2. All corrective actions shall be completed by not later than the next scheduled ISPP renewal survey.

² The "Company" is the entity responsible for the management of the ship in accordance with the ISM Code. For ships to which the ISM Code is not applicable, the Company is the "Managing Owner" in accordance with Section 52 of the Merchant Shipping Act

³ It is understood as of February 2021 an upgrade pack is being developed by Tecnicomar in cooperation with a certifying authority

5. Validity

5.1. This Technical Alert is valid until further notice.

ANNEX I

List of Affected Tecnicomar ECOMAR STP

Certificate Number and MED Module	Model	Specified Standard	Type Approval Certificate Validity
MED1550293 B	ECOMAR 20	MEPC.227(64), including para. 4.2	21/12/2020
MED1550294 B	ECOMAR 32	MEPC.227(64), including para. 4.2	21/12/2020
MED1550295 B	ECOMAR 45	MEPC.227(64), including para. 4.2	21/12/2020
MED1550296 B	ECOMAR 70	MEPC.227(64), including para. 4.2	21/12/2020
MED1550297 B	ECOMAR 145	MEPC.227(64), including para. 4.2	21/12/2020
MED1650019 B	ECOMAR 340	MEPC.227(64), including para. 4.2	13/01/2021
MED1650020 B	ECOMAR 545	MEPC.227(64), including para. 4.2	13/01/2021
MED1650164 D	ECOMAR 6 ECOMAR 6AC ECOMAR 8 ECOMAR 8AC ECOMAR 16 ECOMAR 24 ECOMAR 50 ECOMAR 120 ECOMAR 200 ECOMAR 20 ECOMAR 32 ECOMAR 45 ECOMAR 70 ECOMAR 145 ECOMAR 340 ECOMAR 545	MEPC.227(64), including para. 4.2	28/05/2019