

Inventories of Hazardous Materials

Regulation 1257/2013 (EU SRR)

6th Sea Europe Workshop

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Content

- EMSA's role on ship recycling
- Ship recycling Regulation and IHMs
- New build ships vs existing ships
- IHM Guidance



Ship Recycling - EMSA's role

- Ship Recycling is in EMSA's Work Programme
- Technical support to the Commission on Ship Recycling
(i.e. SRR, cooperation agreement, implementing acts)
- Technical support to Member States
(e.g. workshops, trainings, etc)
- Provide technical support in relation to Port State Control
(e.g. PSC guidelines, THETIS, etc)
- Follow-up of developments at IMO and international level
(e.g. working groups, etc)
- EMSA's role currently limited to issues related to ships in operation in the marine environment (Title II/SRR)



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Ship Recycling Regulation/SRR

- Applies to internationally trading ships of 500 GT and above
- Requires an "Inventory of Hazardous Materials" "EU" ships:
 - On board **new ships** from 31 December 2018 (or earlier)
 - On board **existing ships** from 31 December 2020
 - On **ships going for recycling** from 31 December 2016 (or earlier)
- Requires an "Inventory of Hazardous Materials" "non-EU" ships:
 - On ships calling EU ports/anchorages from 31 December 2020
 - On ships applying for EU MS registry from 31 December 2020



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IHM for new-build ships

- **Part I of the IHM for new ships should be developed at the design and construction stage**
- **Shipyard responsible** (building contract?) - based on information from suppliers:
 - Material Declaration (MD)
 - Suppliers Declaration of Conformity (SDoC)
 - EU/SRR: plus 2 HazMats (PFOS & HBCDD)

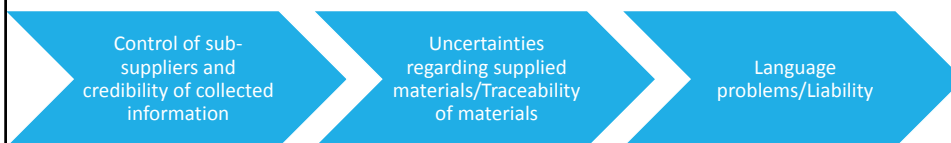
Set up a process to get MDs & SDoCs



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IHM for new-build ships

- **Suppliers' awareness (?)**



suppliers not knowing what material content is in their product =====> **Unreliable MDs (?)**

- **Time consuming IHM preparation for new ships, based on uncertain data**



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IHM for new-build ships

Expectations/ideal world:

- IHM accuracy on HazMats (type, quantity, traceability)
- IHM reliability and quality
- Health, safety and environmental protection

Deliverables/real world:

- Expensive and time-consuming development of IHM
- IHM inconsistencies (document analysis, inaccurate MDs, traceability in supply chain)
- IHM credibility is questioned
- Life-cycle maintenance, recycling process hampered

IHM for existing ships

Quality/accuracy of the IHM varies significantly depending upon:

- Competency (knowledge, experience, ethics)
- Sampling (selection of sampling points, number of samples)
- Analysis (Laboratory expertise and standards, interpretation of laboratory results)
- Role of the Classification Society/verification



IHM for existing ships

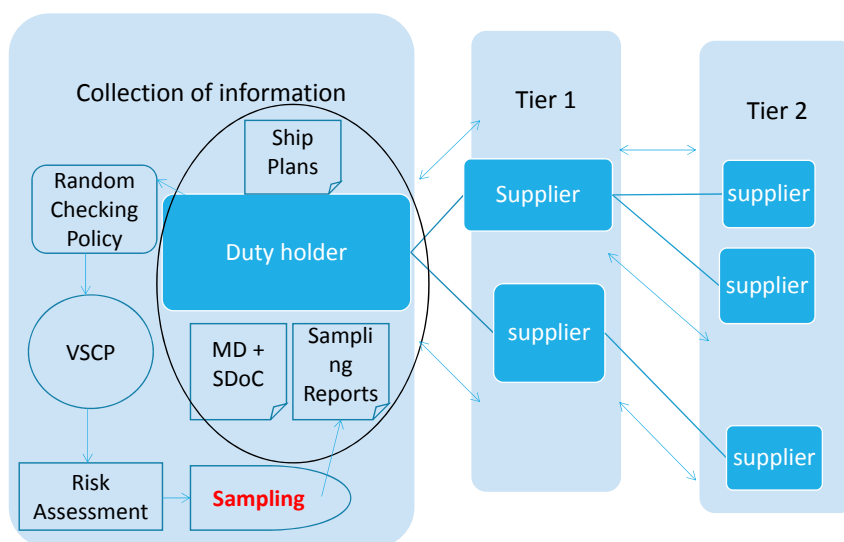
Expectations/ideal world:

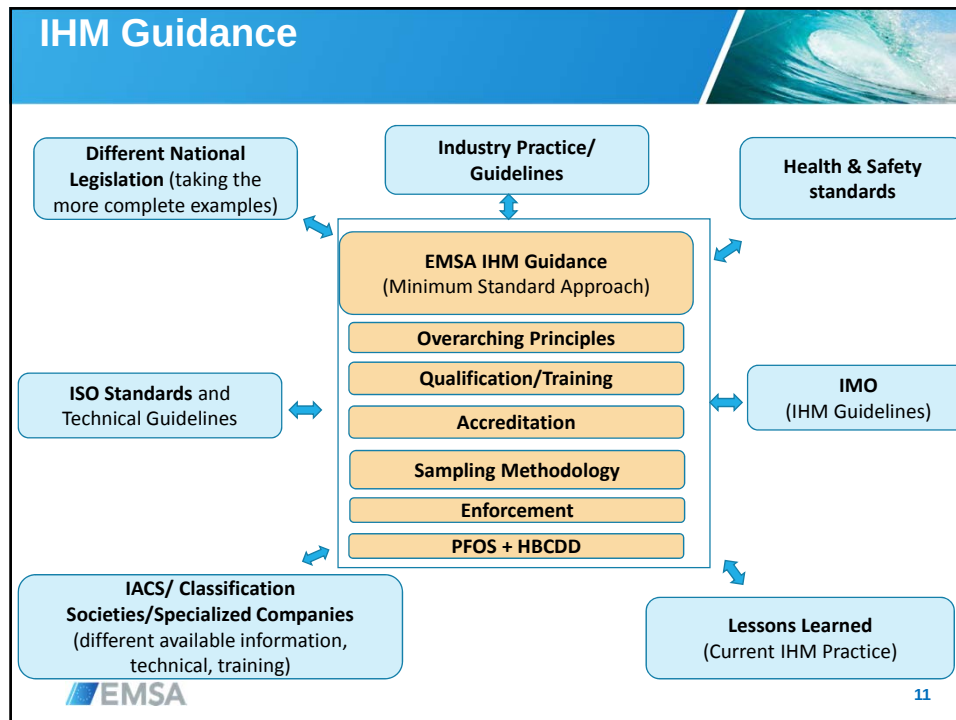
- IHM accuracy on HazMats (type, quantity, traceability)
- IHM reliability and quality
- Health, safety and environmental protection

Deliverables/real world:

- IHM quality/accuracy varies
- Anybody can be a HazMat expert
- Cost and time vary. Costs cheaper than an IHM for a new ship (?)

Collection of Information from the supply chain





Final remarks

- Management of data collection is critical
- Harmonization is needed to ensure a level-playing field
- **Guidance** is needed to have uniform and consistent IHMs
- Minimum standards for qualification and training are desirable
- Proper accreditation of HazMat companies and Laboratories is needed
- Guidance on PSC enforcement is needed in case of “clear grounds”

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European Maritime Safety Agency



Thank you!

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