Clear grounds for further inspections and detailed inspection for EU Ships.

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Live broadcast of the training for PSCO's on Ship Recycling Regulation

Lisbon, 17 February 2021

EMSA
European Maritime Safety Agency

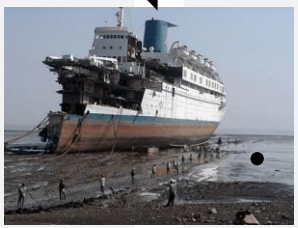
Content

- **Clear Grounds for EU ships**
- **Detailed inspection**
- **Sampling**

SRR requirements for EU Ships

Inventory of Hazardous Materials

- On board new ships from 31 December 2018 or earlier.
- On board existing vessels from 31 December 2020.
- On ships going recycling on 31 December 2016.
- Certificate on inventory of Hazardous Materials from 31 December 2018.



Ready for Recycling Certificate (RFRC)

- For EU ships going for recycling.
- Supplemented by an inventory of hazardous materials.
- Supplemented by the approved ship recycling plan.

CERTIFICATES and SURVEYS

- INTERVALS <=5 YEARS
- VERIFY PART I OF THE IHM

RENEWAL SURVEY

INITIAL SURVEY

ADDITIONAL SURVEY

- SHIPOWNER REQUEST
- SIGNIFICANT REPAIR
- VERIFY PART I OF THE IHM

INVENTORY CERTIFICATE

- VERIFY PART I OF THE IHM
- BEFORE THE SHIP IS PUT INTO SERVICE

Valid not more than 5 years

Issued by the flag State Administrations after successful completion of the survey

FINAL SURVEY

Ready for Recycling Certificate

- The ship has a valid IHM
- Ship Recycling Plan reflects the information contained in IHM
- Ship Recycling Facility approved and contained in the EU list

Not more than 3 months

Issued by the flag Administrations after successful completion of the final survey

Clear grounds for further inspections for EU ships (Certificate related)

CERTIFICATE ON INVENTORY OF HAZARDOUS MATERIALS

under Regulation (EU) No 1257/2013 of the European Parliament and of the Council on ship recycling

(*Note*: This certificate shall be supplemented by Part I of the inventory of hazardous materials)

(Official seal) *(State)*

Issued under the provisions of Regulation (EU) No 1257/2013 under the authority of the Government of

.....

(Name of State)

by .....

(Full designation of the person or organisation authorised under the provisions of Regulation (EU) No 1257/2013)

READY FOR RECYCLING CERTIFICATE

under Regulation (EU) No 1257/2013 of the European Parliament and of the Council on ship recycling

(*Note*: This certificate shall be supplemented by the inventory of hazardous materials and the ship recycling plan)

(Official seal) *(State)*

Issued under the provisions of Regulation (EU) No 1257/2013 under the authority of the Government of

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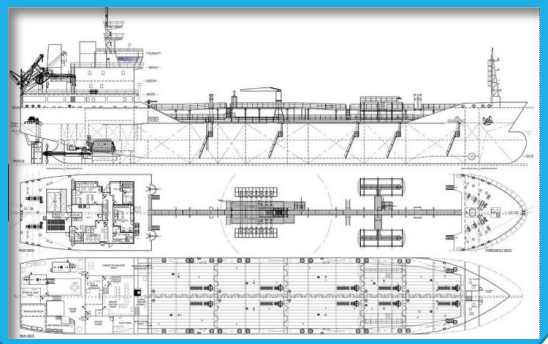
(Name of State)

by .....

(Full designation of the person or organisation authorised under the provisions of Regulation (EU) No 1257/2013)

IHM Content

Part I: HM in ship structure or equipment



Part II: Operational generated waste

Part III: Stores

*On **ships going for recycling***
Verified by the Administration or an RO

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Clear grounds for further inspections for EU ships (Inventory of Hazardous Materials)

Example of the Inventory for existing ships

Inventory of Hazardous Materials for "Sample Ship"

Particulars of the "Sample Ship"

Distinctive number or letters	XXXXNNN
Port of registry	Port of World
Type of vessel	Bulk carrier
Gross Tonnage	28,000 GT
IMO number	NNNNNNN
Name of shipbuilder	xx Shipbuilding Co. Ltd
Name of shipowner	yy Maritime SA
Date of delivery	MM/DD/1988

This inventory was developed in accordance with the guidelines for the development of the Inventory of Hazardous Materials.

Attachment:

1: Inventory of Hazardous Materials

2: Assessment of collected information

3: Location diagram of Hazardous Materials

Prepared by XYZ (Name & address) (dd/mm/20XX)

Clear grounds for further inspections for EU ships (IHM)

- Evidence that the inventory of hazardous materials required by the SRR is missing or clearly invalid;
- Evidence that the Inventory of Hazardous Materials required by the SRR is not specific to the ship;
- Evidence that the Inventory of Hazardous Materials required by the SRR has not been verified by the FS or an appropriate organisation authorized by it.
- The absence of structure or equipment identified in part I of the Inventory of HM;
- The absence of an entry in part I of the Inventory of Hazardous Materials for structure or equipment that the inspector suspects to contain HM listed in Annex I and II of the SRR;
- No evidence of implementation of a procedure on board the ship for maintaining part I of the IHM.

Clear grounds for further inspections for EU ships (ships going for recycling)

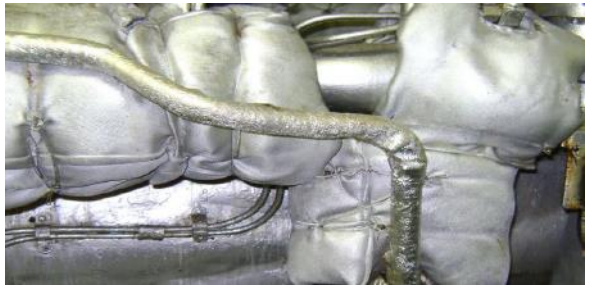
- Evidence that the Ready for Recycling certificate is missing;
- The ship recycling plan does not properly reflect the information contained in the Inventory of Hazardous Materials;
- For the EU ships, going for recycling, evidence that the inventory of hazardous materials, in addition to the properly maintained and updated Part I, has not incorporated Part II for operationally generated waste and/or Part III for stores and/or has not been verified by the administration or a recognised organization authorised by it;
- For EU ships going for recycling, evidence that the ship is heading to a ship recycling facility not included in the European list;

Detailed inspection on EU flag ships

- **The initial inspection reveals clear grounds warranting a detailed inspection under the SRR.**
- **Further investigation could verify the controls of the HM material of Annex I:**

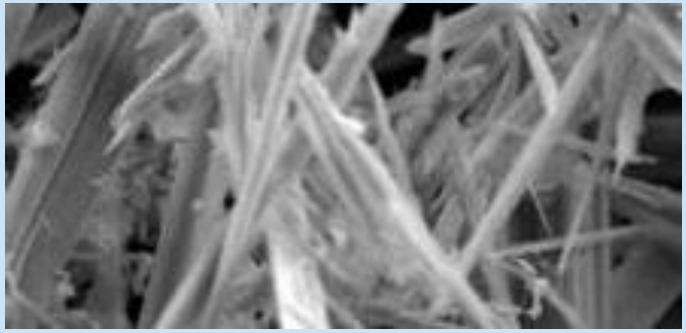
HAZARDOUS MATERIAL	THRESHOLD VALUE	REFERENCED EU LEGISLATION*
Asbestos[64]	0.1%	SRR/Annex I, Regulation (EC) 1907/2006 "Registration, Evaluation, Authorisation and Restriction of Chemicals" (REACH), Council Directive 76/769/EEC "on the approximation of the laws, regulations and administrative provisions of the MS relating to restrictions on the marketing and use of certain dangerous substances and preparations[65]", Directive 2009/148/EC "on the protection of workers from the risks related to exposure to asbestos at work[66]".
Ozone Depleting Substances[67] (ODS)	No threshold value	SRR/Annex I. Regulation No 1005/2009 on substances that deplete the ozone layer[68].
Polychlorinated Biphenyls (PCB)	50 mg/kg	SRR/Annex I, Regulation (EC) 850/2004 "on persistent organic pollutants[69]".
Perfluorooctane sulfonic acid[70] (PFOS) and its derivatives (CAS No: 1763-23-1) $C_8F_9SO_2X$ (X = OH, Metal salt (O-M+), halide, amide, and other derivatives including polymers) Examples of PFOS derivatives: Potassium perfluorooctane sulfonate (CAS no. 2795-39-3); Lithium perfluorooctane sulfonate (CAS no. 29457-72-5); Ammonium perfluorooctanesulfonate (CAS no. 29081-56-9); diethanolammonium perfluorooctane sulfonate (CAS no. 70225-14-8); tetraethylammonium perfluorooctane sulfonate (CAS no. 56773-42-3); didecyldimethylammonium perfluorooctane sulfonate (CAS no. 251099-16-8).	Concentrations of PFOS **above** 10 mg/kg (0.001% by weight) when it occurs in substances or in preparations or Concentrations of PFOS in semi-finished products or articles, or parts thereof **equal to or above** than 0.1% by weight calculated with reference to the mass of structurally or micro-structurally distinct parts that contain PFOS or For textiles or other coated materials, if the amount of PFOS is **equal to or above** than 1 µg/m² of the coated material.	SRR/Annex I, Regulation (EC) 850/2004 "on persistent organic pollutants", Directive 2006/122/EC "relating to restrictions on the marketing and use of certain dangerous substances and preparations (perfluorooctane sulfonates)[71]".
Anti-fouling compounds and systems	2500 mg total tin/kg	SRR/Annex I, Regulation (EC) 782/2003 "on the prohibition of Organotin Compounds on ships[72]", Council Directive 76/769/EEC "on the approximation of the laws, regulations and administrative provisions of the MS relating to restrictions on the marketing and use of certain dangerous substances and preparations[73]".

Detailed Inspection

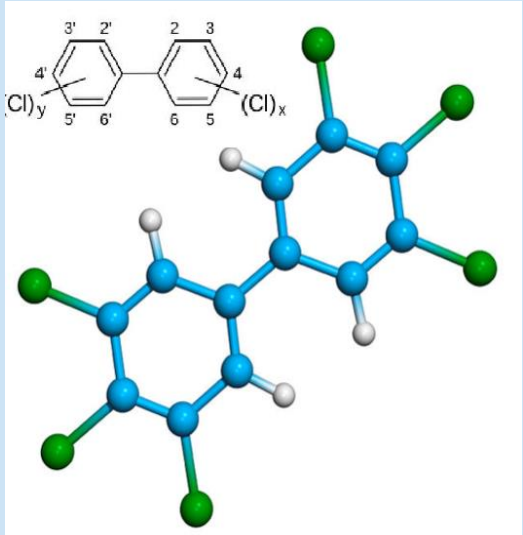


- Carry out detailed inspection in other ship areas at random;
- Request the flag States intervention in order to confirm the ships compliance with the SRR when in doubt.
- Proceed with a sampling check for structure or equipment for which there is not entry in Part I of the IHM but the inspector suspects to contain Hazardous materials listed in Annex I and II of the SRR.

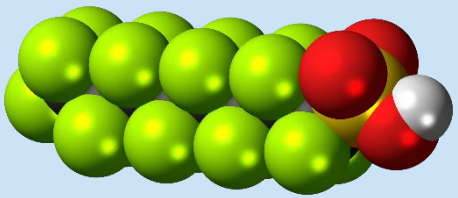
Indicative list of inspection areas for HM

Structure or equipment	Hazardous Material
Propeller Shafting	**Asbestos** 
Diesel Engine	
Turbine Engine	
Boiler	
Exhaust gas economizer	
Incinerator	
Auxiliary machinery	
Heat Exchanger	
Valve	
Pipe Duct	
Tanks (Fuel, hot water, condenser)	
Electric equipment	

Indicative list of inspection areas for HM

Structure or equipment	Hazardous Material
Transformer	**Polychlorinated biphenyl (PCBs)** 
Fuel Heater	
Rubber hoses	
Heat Oil	
Lubricating Oil	
Thermal Insulating Materials	
Voltage Regulators	
Switches/reclosers/bushings	
Electric Cables	
Rubber gaskets	

Indicative list of inspection areas for HM

Structure or equipment	Hazardous Material
Aqueous film forming foams	**PFO's** 
Film forming Fluor protein foams	
Alcohol resistant aqueous film forming foams	
Hydraulic fluids	
Cable sheath	
Coatings	
Adhesives	

Sampling check during detailed inspection

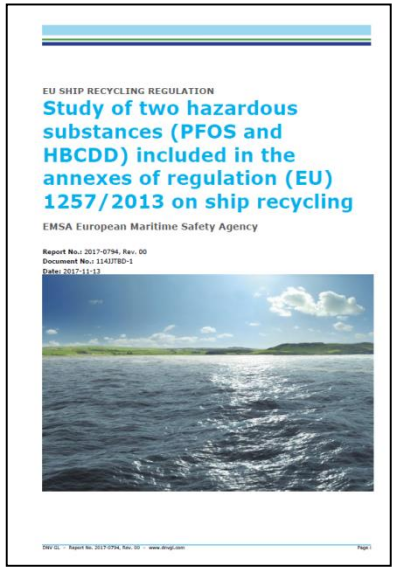
- The inspector suspects that the ship structure or equipment for which there is no entry into IHM contains HM listed in Annex I and II.
- Sampling should be only undertaken by competent personnel and with the proper use of suitable equipment.
- The inspector of that authority may be assisted by ant person with the required expertise.
- It is recommended to follow the sampling methodology described in the EMSA's Best Practice Guidance on the IHM.

Conclusions

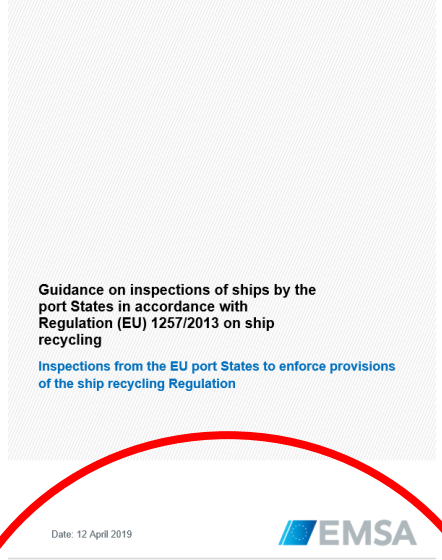
- Ships with an EU flag are expected to have an IC or a ready for RfRC as applicable. Existing ships shall carry certificate IC from 31 December 2020.
- Documents issued by the Flag State or on behalf of the Flag State by an RO.
- The initial inspection shall be limited to checking that any of the required SR reflecting to the ship present status are kept on board.
- Only if clear grounds exist the inspector shall proceed to a detailed inspection.
- In case sampling will be decided this should be performed with caution and only by the right person with the right equipment.
- Sampling should be the last option.

EMSA publications on Ship Recycling

Publication of "**EMSA's Best Practice Guidance on the Inventory of Hazardous Materials**" providing guidance and a harmonised approach to the development and maintenance of **inventories of hazardous materials** within the context of the EU Ship Recycling Regulation;



Publication of a **study on the two Hazardous Materials** (**PFOS and HBCDD**) included in the Annexes of Regulation (EU) 1257/2013 on Ship Recycling;



Development of a "**Guidance on inspections of ships by the port States in accordance with Regulation (EU) 1257/2013 on ship recycling**"

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Thank you for your attention

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