



ECSA

European Community Shipowners' Associations

Securing a level playing field and a credible IHM: Challenges for the shipowners

**EMSA Workshop on the Inventory of Hazardous Materials (IHM)
21 September 2016**

Benoît Loicq - Director Maritime Safety and Environment – ECSA

About ECSA: The European Community Shipowners' Associations (ECSA), formed in 1965, comprises the national shipowners' associations of the EU and Norway. ECSA aims at promoting the interests of European shipping so that industry can best serve European and international trade and commerce in a competitive and free business environment, to the benefit of both shippers and consumers. The European Economic Area maintains its very prominent position with a controlled fleet of 40% of the global commercial fleet.



ECSA

European Community Shipowners' Associations

INTRODUCTION TO ECSA

- Est. 1965 – Brussels
- National shipowners' associations EU + Norway
- Spokesman of the European Shipowners towards the EU Institutions
- Network with other shipping organisations
- European Shipping: key player / 40% of the world merchant fleet
- All trades—all sectors

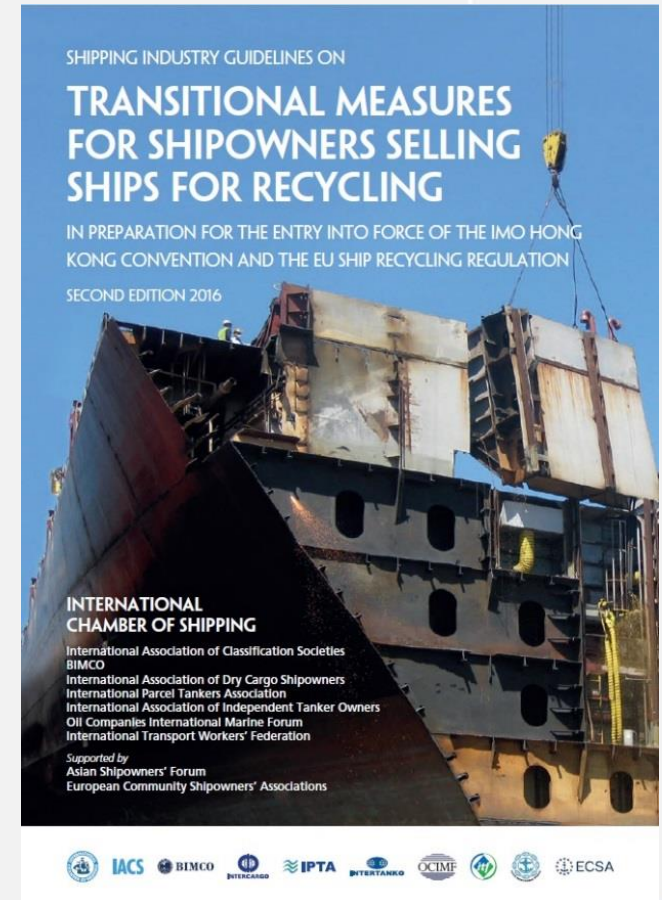


ECSA

European Community Shipowners' Associations

CHALLENGES FOR SHIPOWNERS

- Shipowners and Recycling Facilities equally have a corporate social responsibility to ensure that ships are dismantled in a sustainable way, also during the interim period before the entry into force of the HKC and the application of the EU SRR
- IHM: Level playing field ensured?
- Challenges:
 - Timing issue
 - Ensuring effective and accurate IHM



EMSA BEST PRACTICE GUIDANCE

■ **IHM Expert requirement issue**

- Reassurance is needed that shipowners won't be held to be non-compliant in case shipowners may not have appointed an IHM expert from early in the process of preparing an IHM list



ECSA

European Community Shipowners' Associations

EMSA BEST PRACTICE GUIDANCE

■ IHM Development issues

- Sampling and analysis purposes
- Health and Safety – Shipowner's liability

■ IHM Maintenance issues

- Life-cycle management – level-playing field
- Life time quality management

➤ A more distinctive approach and clear guidance should be provided as regard the IHM preparation for newbuilds, IHM preparation for existing ships and the life-cycle maintenance of the IHM

EMSA BEST PRACTICE GUIDANCE

- **Enforcement: Issue of carrying out HM survey/sampling following a PSC inspection**
- Detailed inspection triggered by a PSC inspection should be according to IMO Guidelines for the Inspection of Ships under HKC.



ECSA

European Community Shipowners' Associations

CONCLUSIONS

- **IHM is part of the solution towards sustainable ship recycling operations – Development in EU SRR/HKC interim period is essential**
- **Timely development of effective and accurate IHM needs to be ensured whilst maintaining the level playing field**
- **Rising awareness and guidance on best practices are needed**

Benoît Loicq – Director Maritime Safety and Environment
European Community Shipowners' Associations (ECSA)
Rue Ducale, Hertogstraat 67/2 – B-1000 Brussels
+ 32 2 510 61 25 – benoit.loicq@ecsa.eu – www.ecsa.eu