



PREVENTION AT SEA

CIRCULAR 04/2019

ASBESTOS & INVENTORY OF
HAZARDOUS MATERIALS.
IS YOUR VESSEL
COMPLIANT?

Don't Cure,
PREVENT

Asbestos & Inventory of Hazardous Materials. Is your Vessel Compliant?

Case: During a H.EL.M.E.T. audit on a bulk carrier vessel, the PaSea Auditor observed that although the vessel was issued with an Asbestos-Free declaration, asbestos was found in several locations onboard the vessel.

More specifically, asbestos was found in the flange gaskets, in the deck and bulkhead insulation, in pipe lagging and electric cables, as well as other parts of the vessel.

Asbestos containing materials

Asbestos is actually the generic name given to the fibrous variety of six naturally occurring silicate minerals. The most commonly recognised types of asbestos are blue, brown and white. Their common names relate to their natural colour and have nothing to do with how they appear in products.

When asbestos is disturbed it produces airborne fibres or dust. If this is inhaled or swallowed the fibres penetrate the lungs and abdomen and lodge themselves in the mesothelium, which is the tissue lining that protects the body's major internal organs. These asbestos fibres cause irritation which can lead to the development of serious diseases and ailments.



Asbestos can be found virtually everywhere on a ship but typically it would be found in places like:

- concrete & tiling on the floor
- doors, wall & ceiling panels
- glues & sealants in windows & furniture
- heat insulation & lagging
- electrical cables
- brake linings and gaskets, pipes and cables
- mooring ropes
- firemen's outfits
- furnace firebricks
- welding shop curtains and welders gloves.

THE REGULATORY FRAMEWORK

Since **1st January 2011**, any new installation of materials containing asbestos is prohibited on all ships, **without any exception** – Ref: Regulation 3-5.2, SOLAS Chapter II-1 (Construction - Structure, Subdivision And Stability, Machinery and Electrical Installations).

All new and existing ships are required to carry out an Asbestos Survey that is performed by an accredited marine specialist / ISO17020 survey company. This survey can in effect be part of an approved **Inventory of Hazardous Materials (IHM)** survey.

The EU Ship Recycling Regulation (EUSRR) that entered into force on 30th December 2013 has the following requirements for commercial vessels above 500 GT that are operating outside the flag state's borders:

- **EU-flagged Newbuildings** are required to have onboard a verified IHM with a Statement of Compliance at the earliest by 31st December 2015 and at the **latest by 31st December 2018**.
- **EU-flagged Existing vessels** are required to have onboard a verified IHM with a Statement of Compliance at the **latest by 31st December 2020** (or if the ship is to be recycled, the IHM should be on board from the date when the European list of ship recycling facilities was first published 19th December 2016).
- **Non-EU-flagged vessels** calling at EU ports are also required to have onboard a verified IHM with a Statement of Compliance at the **latest by 31st December 2020**.

INVENTORY of HAZARDOUS MATERIALS

- The IHM covers the whole life of the ship, from construction and operation to preparation for scrapping at the end of the ship's useful life.
- The objectives of the Inventory are to provide ship-specific information on the actual Hazardous Materials present on board, in order to protect health and safety and to prevent environmental pollution at Ship Recycling Facilities. This information can be used by the Ship Recycling Facilities in order to decide how to manage the types and amounts of materials identified in the IHM (regulation 9).

IHM for new ships

The shipyard is responsible for compiling the IHM based on information provided by suppliers via the Suppliers Declaration of Conformity (SDoC) and the Material Declaration (MD) in which the supplier makes a clear statement whether or not HazMats are contained. If they are contained, the supplier must specify place and quantity. The EU has added two more HazMats, the so called PFOS and HBCDD, therefore the EU IHM is different from the IMO IHM.

IHM for existing ships

The owner is responsible for the IHM which should be prepared by IHM professionals and is based on investigation, samplings, analyses, calculations and documentation. The accuracy of an IHM depends on planning; expertise on sampling locations (materials – indicative lists); number of samples taken; detail of documentation; laboratory standards and expertise; and the interpretation of laboratory results.

NEXT STEPS TO CONSIDER

Owners are advised to ensure timely preparation, therefore, the following actions are recommended:

- For existing fleet, Owners are suggested to acquire an IHM latest by 2020.
- For new builds it is suggested to include the IHM in building specifications (since end of 2015) as well as Class certification of the IHM.
- For the last voyage of the vessel, EU ships must have a certified IHM onboard and be scrapped at a EU approved ship recycling facility.
- For the daily operation of the fleet it is suggested to nominate a designated person, use of a data repository to maintain IHM and set up the process to acquire MDs and SDoCs.

REMEMBER: an IHM is not only for old ships or for ships on their journey for scrap, an IHM is part of a vessel's lifetime process!

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FOR MORE INFORMATION,
PLEASE DO NOT HESITATE TO CONTACT US.



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