

Subject

Amendment of IMO's Guidelines for the development of the Inventory of Hazardous Materials regarding Ship Recycling Convention

# **ClassNK**

## ***Technical Information***

No. TEC-1050  
Date 27 October 2015

To whom it may concern

As already advised in ClassNK Technical Information No.TEC-1043 issued on 27 August 2015, the amendment of the guidelines for the development of the inventory of the hazardous materials regarding the Ship Recycling Convention was deliberated in the 68th IMO Marine Environment Protection Committee (MEPC.68) in May 2015, and it was adopted as the RESOLUTION MEPC.269 (68) "2015 GUIDELINE FOR THE DEVELOPMENT OF THE INVENTORY OF HAZARDOUS MATERIALS" on 15 May 2015.

The outline of the amendment is as shown in the appendix to this technical information. The main contents are changes or clarifications on the threshold value of the hazardous materials to be indicated on the Material Declaration (MD) and on how to describe the inventory for the purpose of easier development of the inventory for new ship. Inventories which will be undertaken to develop after 15 May 2015<sup>(Note 1)</sup> are required to develop in compliance with the RESOLUTION MEPC.269 (68).

Please be informed that ClassNK reviewed its "Guidelines for the Inventory of Hazardous Materials" in order to implement the RESOLUTION MEPC.269 (68). The revised ClassNK "Guidelines for the Inventory of Hazardous Materials" can be downloaded from the ClassNK website. While, necessary improvements are being carried out on the system "PrimeShip-GREEN/SRM" and it will be available by 1 November 2015.

Note 1) ClassNK will treat the inventories for which the applications are made on or after 1 November 2015 as ones which are undertaken to develop after 15 May 2015 and examine them according to the RESOLUTION MEPC.269 (68).

(To be continued)

NOTES:

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[About IMO guidelines]

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[About the appraisal of inventory]

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Attachment:

1. Outlines of the amendment of the Guidelines for the Development of the Inventory of the Hazardous Materials adopted in the 68th IMO Marine Environment Protection Committee (MEPC.68) (Summarized by ClassNK)

Attachment 1. to  
ClassNK Technical Information No. TEC-1050

### **Appendix:**

## **Outlines of the amendment of the Guidelines for the Development of the Inventory of the Hazardous Materials adopted in the 68th IMO Marine Environment Protection Committee (MEPC.68) (Summarized by ClassNK)**

### **【Application of revised guideline】**

Revised threshold values for hazardous materials should be used for IHMs developed or updated after the adoption of the revised values in MEPC.68 (i.e. 15 May 2015) and need not be applied to existing IHMs and IHMs under development. However, when materials are added to the IHM, such as during maintenance, the revised threshold values should be applied and recorded in the IHM.

### **【Revision to threshold values】**

#### ➤ **Asbestos**

The threshold value of asbestos is changed from “no threshold level” to “0.1%”. However, if 1% is applied, this threshold value should be recorded in the Inventory and, if available, the Material Declaration and can be applied not later than five years after the entry into force of the Convention. The threshold value of 0.1% need not be retroactively applied to those Inventories and Material Declarations. (For the ships built at shipyard in Japan and the ships flying flag of Japan, it isn't applicable to use IHM or the MD made by the threshold value of 1% because the threshold value of asbestos is specified as “0.1%” by Industrial Safety and Health Law in Japan.)

#### ➤ **PCB (Polychlorinated biphenyls)**

The threshold value of PCBs is changed from “no threshold level” to “50mg/kg”.

#### ➤ **Ozone depleting substances**

“No threshold value” is applicable as ever. Unintentional trace contaminants should not be listed in the Material Declarations and in the Inventory.

#### ➤ **PBBs (Polybrominated biphenyl)**

The threshold value for PBBs is changed from “1000mg/kg” to “50 mg/kg” as the threshold value referring to the concentration level at which wastes, substances and articles containing, consisting of or contaminated with PCB/PBB/PCN are characterized as hazardous under the Basel Convention.

#### ➤ **PCNs (Polychlorinated naphthalenes(more than 3 chlorine atoms))**

The threshold value for PCNs is changed from “no threshold level” to “50 mg/kg” as the threshold value referring to the concentration level at which wastes, substances and articles containing, consisting of or contaminated with PCB/PBB/PCN are characterized as hazardous under the Basel Convention.

#### ➤ **Radioactive substances**

“No threshold value” is applicable as ever. All radioactive sources should be included in the Material Declaration and in the Inventory but radioactive substances of the surface pollution and natural derivation should be excluded. To clarify “Radioactive source”, it is defined as radioactive material permanently sealed in a capsule or closely bonded and in a solid form that is used as a source of radiation and examples are listed in appendix 10.

➤ **Form of Material Declaration**

Form of Material Declaration is revised to update in accordance with the above revised threshold values.

**【Terminology】**

The group agreed to replace the term “threshold level” with the term “threshold value” throughout the Guidelines as the latter is the terminology used in the Hong Kong Convention.

**【Clarification of equipment to be listed in part III — Canges of equipment of which MD should be collected】**

➤ **Definitioins of “Fixed” and “Loosely fitted equipment”**

Definitioins of “Fixed” and “Loosely fitted equipment” are newly set.

“Fixed” means the conditions that equipment or materials are securely fitted with the ship, such as by welding or with bolts, riveted or cemented, and used at their position, including electrical cables and gaskets.

“Loosely fitted equipment” means equipment or materials present on board the ship by the conditions other than “fixed”, such as fire extinguishers, distress flares, and lifebuoys<sup>(1)</sup>. For loosely fitted equipment, there is no need to list in part I of the Inventory. Such equipment which remains on board when the ship is recycled should be listed in part III. Therefore, there is no need to collect MDs for such equipment.

➤ **Batteries**

For batteries, it is clarified as follows:

Those batteries containing lead acid or other hazardous materials that are fixed in place should be listed in part I of the Inventory. Batteries that are loosely fitted, which includes consumer batteries and batteries in stores, should be listed in part III of the Inventory.

Therefore, there is no need to collect MDs for such butteries.

➤ **Revision of Table D-Regular consumable goods potentially containing hazardous materials**

Items that are illustrated in Table D is reviewed, and it is clarified that “electrical and electronic equipment”, such as personal computer nad printers, “lighting equipment”, such as fluorescent lamps, filament bulbs and lamps<sup>(2)</sup>, and “non ship-specific furniture and interior”, such as sofas and tables, are required to be listed up in Part III of the Inventory before recycling ships not in Part I. Therefore, there is no need to collect MDs for such items.

**【Exemptions – Materials not required to be listed in the Inventory】**

Regarding materials not required to be listed in the Inventory, it is clarified as follows:

Materials listed in table B that are inherent in solid metals or metal alloys, such as steels, aluminiums, brasses, bronzes, plating and solders, provided they are used in general construction, such as hull, superstructure, pipes, or housings for equipment and machinery, are not required to be listed in the Inventory.

Although electrical and electronic equipment is required to be listed in the Inventory, the amount of hazardous materials potentially contained in printed wiring boards (printed circuit boards) installed in the equipment does not need to be reported in the Inventory.

**【Bulk Listing】**

It is clarified that similar materials or items, such as bolts, nuts and valves, that contain hazardous materials that potentially exceed the threshold value can be listed together (not individually) on the IHM with their general location and approximate amount specified there as “Bulk Listing”<sup>(3)</sup>.

**- Supplementary interpretations of ClassNK for notes are as follows:**

(Note 1) Lifeboats and liferafts are included in “Loosely fitted equipment”. Therefore, they are not required to collect MDs for or to report in the Inventory Part I. They are to be indicated in the Inventory Part III by the shipowner before ship recycling.

(Note 2) “lighting equipment”, such as fluorescent lamps, filament bulbs and lamps, are limited to the fluorescence lamps, filament bulbs and lamps replaced for exchange in the lighting equipment and the desktop lighting equipment as general consumable goods. Such lighting equipment are not required to report in the Inventory Part I and MDs for them are not required to collect.

However, for bodies of lighting equipment and thiers electric circuits and switches, etc., which are fixed on the ship, it is necessary to collect MDs, and to report in the Inventory Part I if any hazardous material is contained.

(Note 3) The way of Bulk Listing has been actually applied in the inventory through examinations and instructions ever done by ClassNK. Therefore there is not so large change in the future development of an inventory in practice. For an example of change, when similar materials or items is installed over the whole area of ships, the conventional words of “All over the ship” for the location are replaced by “Throughout the ship”.

---The end---