

RECYCLING OF SHIPS

Draft Guidelines for the development of the Inventory for Hazardous Materials

Submitted by ICS, BIMCO, Intertanko, Intercargo, IPTA

<i>Executive Summary:</i>	The authors provide comments upon paper MEPC 56/3/2 by Japan and Germany, highlighting principles and concerns for the further development of the work.
<i>Action to be taken:</i>	Paragraph 5
<i>Related documents:</i>	MEPC 56/3/2

Introduction

1 This document is submitted in accordance with the provisions of paragraph 4.10.5 of the Committee's Guidelines (MEPC/Circ.405).

2 The co-sponsors welcome the work undertaken by Germany and Japan on the draft Guidelines for the development of the Inventory of Hazardous Materials as a basis from which to develop a meaningful and practical tool for enforcing the International Convention on the Safe and Environmentally Sound Recycling of Ships. However, concerns exist that in their current form the guidelines could produce an unwieldy document that does not fulfil the ultimate objectives of the draft Convention in general and the Inventory of Hazardous Materials provisions in particular.

3. The authors believe that it is of paramount importance to recall the ultimate purpose of the Inventory when developing the supplementary guidance material, namely that it is a tool for use by recycling facilities in identifying special and specific hazards for which they must take special precautions above and beyond those normally applied in the recycling process.

4. In this respect the following questions are raised for consideration as a framework for the development of the Guidelines:

1. What is the ultimate purpose of the Inventory of Hazardous Materials?
2. Can the Inventory produced through the Guidelines be practically applied in a ship recycling context?
3. Are the criteria and thresholds too extensive in the context of the Convention's objective?

5. Is the List of Hazardous Materials appropriate in the context of the Convention?

6. What impact will the Guidelines have on the Convention's ratification and entry into force?

Action requested of the Committee

5. The Committee is invited to consider the above and decide as appropriate.