

Correct implementation of EU SRR should be our CSR

Shailesh Singh, Asst. General Manager (IHM) at Verifavia Shipping shines a light on the crucial facts surrounding the inventory of hazardous materials (IHM), considering many assumptions on the EU Ship Recycling Regulation (EU SRR) regulation.

A good regulation must start with clear understanding of its primary objectives which necessitates a dialogue between regulators, the regulated community, and of course the beneficiaries of regulation.

A lot of misinformation and disinformation is floating around in the industry regarding EU SSR, however amidst all the noise, let us not forget the air and purpose of this regulation to begin with, which is to ensure that ships when being recycled after reaching end of their operational lives, do not pose any unnecessary risk to human health and safety or to the environment. Since the convention and regulation is relatively new and constantly evolving, it would require few further amendments to cover the loopholes which currently exist.

We, at Verifavia, stand for doing what is right rather than what is convenient. We believe in delving deeper, unravelling, questioning not only the existing norms but ourselves too, and that has made all the difference. Hence, below we have highlighted some of the many truths and falsehoods of the notions that surround the regulation in question.

For instance, there is a separate section which talks about “**Exemptions – Materials not required to be listed in the Inventory**”. In this section a point states that materials from Table B that will essentially exist in solid metals or alloys such as steel, aluminium, brass, bronze, plating and solders, ***provided they are used in general construction such as hull, superstructure, pipes or housing for equipment and machinery*** are not required to be listed in inventory. We have seen many IHM service suppliers conducting webinars and meetings with suppliers and assuring them that all alloys are to be exempted. However, in reality, it is clearly mentioned that alloys are only exempted if they are used in general construction.

Another instance whereby some service suppliers are disseminating false assurances to the suppliers is the section which states that “***updating is not required if identical parts or coatings are installed or applied.***” And based on this sentence alone many suppliers are being informed by that they need not provide Material Declarations (MD) and Supplier’s Declaration of Conformity (SDOC). However, further on the same section it is stated that *if any machinery or equipment is added to, removed, or replaced Part I of the Inventory should be updated according to the requirements for new ships* which is by collecting MDs and SDOCs.

Now everyone is free to exercise their own interpretation, nevertheless sensibly whenever any machinery equipment is *added, removed or replaced* MDs and SDOCs should be collected, checked and saved. Once we have the requisite documentation for that particular equipment/machinery/part, then for its subsequent replacement with an identical part (*identical in terms of material composition, basically same part supplied by same*

manufacturer having same material composition) thereafter MDs and SDOCs are not required. It should be simple, effective and accurate.

There are few more sections from the regulation on which EU and IMO collectively should consider bringing about dire amendments, for example MDs and SDOCs are to be taken from varied suppliers/manufacturers, but what if they are not willing or not ready to provide it? Serious repercussions can follow and in extreme cases we have seen the suppliers' losing their business to their competitors who are abiding the regulation more strictly.

In our opinion, till the time all grey areas of regulation are dealt with, companies acting as IHM service suppliers should lead by example and ensure smooth and seamless implementation of this regulation.

As it is rightly said, "With integrity, you have nothing to fear, since you have nothing to hide. With integrity, you will do the right thing, so you will have no guilt." Hence, let's all work together with integrity and ensure IHM is enforced the righteous way!

For information about Verifavia's one-of-a-kind IHM maintenance dashboard to ensure a simple, reliable, digital solution to maintaining a vessel's IHM click here:
<https://www.verifavia-shipping.com/shipping-carbon-emissions-verification/service-maintenance-of-ihm-274.php>