

IHM Maintenance: Working for the Greater Good

Inventory of Hazardous Materials (IHM) is seen today as an undue and unwarranted liability on shipowners' shoulders. A lot of speculations and myths are floating around more so due to lack of clarity while interpreting regulations governing the same.

Whether it is IMO MEPC.269(68), EUSSR 1257/2013 or EMSA Guidelines, all together stand astute in solidarity in conveying the need of the hour with absolute clarity.

It is indeed interesting to see a simple regulation, word of law, detailed and explicit being interpreted in numerous ways by varied service suppliers to ease their load, leading to brewing a sense of unhealthy competitiveness among fellow service providers and instilling lingering doubts and confusion in shipowners and other suppliers alike.

In this seething rat race, one tends to forget the real purpose and objective of the regulation to begin with, which was and will always be, safeguarding our environment and health of people by extension.

For instance, let's take a simple example of how few simple lines from a regulation are being misinterpreted:

MEPC 68/21/Add.1 Annex 17, page 4

3.3 Exemptions – Materials not required to be listed in the Inventory

To lessen the burden, this is being seen through a tunneled vision as:

3.3.1 Materials listed in Table B that are inherent in solid metals or metal alloys, such as steels, aluminum, brasses, bronzes, plating and solders

However, in totality, this point is not limited to the first few lines.

3.3.1 Materials listed in Table B that are inherent in solid metals or metal alloys, such as steels, aluminum, 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.

As one can judge, the meaning in entirety has completely changed as to what it was projected in the first few lines.

There are ample cases like the one above, where we find the regulation is being misconstrued to eliminate "excess" work.

We have sadly witnessed, in some cases in order to project higher document coverage of MD and SDOC, some have resorted to making their own declarations without prior knowledge of even the one who has supplied it!

We all must understand, IHM Preparation and Maintenance, is a tough and tedious task, yet if tackled step by step meticulously it will resonate and fall in sync with the requisite regulatory requirements without any additional undue load or burden on any concerned party involved.

Hence, we must all strive to work as one, for the greater good, ensuring conformity, sustainability and protection of environment and health.