

## Easing the burden of hazardous materials regulations

With the EU SRR effectively making IMO's Hong Kong Convention a reality for many shipowners, third-party auditor Verifavia has successfully branched out into ensuring vessels are HazMat compliant

On 31 December 2018, the European Union's Ship Recycling Regulation (EU SRR) entered into force, prohibiting or restricting the use of hazardous materials onboard EU-flagged newbuildings and EU-flagged vessels heading for demolition at recycling yards. Two years after that date it will be further extended to cover all other EU-flagged ships, as well as ships trading under the flag of a third country that call at an EU port of anchorage.

It is estimated that some 35,000 ships will be affected by the legislation, which in effect represents a localised phasing in of IMO's Hong Kong Convention (HKC) for the Safe and Environmentally Sound Recycling of Ships. For shipowners it represents further administrative burden on top of the EU Monitoring, Reporting and Verification of CO<sub>2</sub> emissions (EU MRV), IMO's parallel Data Collection Scheme (IMO DCS) for fuel consumption and, of course, the pending sulphur cap.

However, as reported in June's *TNA*, there is a growing acceptance within the industry of the HKC's importance in both environmental protection and improving the often-appalling health and safety standards endured by workers at recycling facilities in South Asia, where 90% of vessels are scrapped.

One company that could be said to have a foot in both camps is Verifavia, a third-party consultancy with a presence in both Europe and Asia, that provides independent environmental verification, certification and auditing services for commercial transportation. Verifavia Shipping initially focused its activities on assisting companies with EU MRV and IMO DCS compliance, and says it is now the world's largest independent (non-class) verifier of carbon emissions for shipping companies. But more recently it has extended its auditing services to include



Representatives of Verifavia Shipping ahead of an IHM inspection of the bulk carrier *E.R. Borneo*

verification of the Inventory of Hazardous Materials (IHM) that must be held by ships as part of EU SRR.

In May, it was announced that Zeaborn Ship Management had contracted Verifavia to conduct IHM surveys for its fleet of more than 100 vessels, apropos the issuance of Statements of Compliance (SoC) by the Korean Register (KR). Verifavia has now been approved as a HazMat Expert Company by most of the major classification societies.

### Gap in the market

Yuvraj Thakur, commercial director of Verifavia Shipping and its lead IHM expert, explains that the company first became aware of a gap in the market for EU SRR services through its EU MRV work. "The regulation is prepared by the EC but has guidelines which are provided by the European Maritime Safety Agency (EMSA), so we were working in much the same domain. Being marine engineers and naval architects, we quickly caught up, particularly because ship recycling was a subject close to us," he says.

"So, from last year we started to research it. But it's not just a case of going onboard a ship and becoming an IHM inspector. I was the first one in the company to attend a four-day training course held by DNV GL, which involves going onboard vessels and learning how to take samples to check for

substances such as asbestos [as detailed in the Annex for EU SRR 1257/2013].

"These samples are then sent to an independent ISO certified lab and they generate a report that is submitted to the class society. Of course, the class may have a few additional queries but if these are resolved then eventually they will issue a Statement of Compliance to the ship."

Verifavia now has a 15-strong team of trained HazMat experts based out of its Indian office, including a quality controller who has been working in IHM since 2009. "We wanted the service to have the same DNA as for our EU MRV services, so invested a lot into the training of our people," says Thakur. "Our inspectors are already familiar with vessels; they will normally have four or five years' experience of sailing onboard ships and, as most of them are from India, they know why it so important."

For Verifavia, the IHM audit will typically begin with a presentation to the management company about EU SRR, IHM and what to expect from the process. Key documentation will already have been requested in advance from the shipowners, such as the Fire control & Safety Plan, Insulation plan, General Arrangement and International Air Pollution Prevention certificate. These will be used to prepare the Visual / Sampling Check Plan (VSCP), which identifies areas of the ship from which samples will need to be taken, as creating a location diagram for these.

A minimum port or anchorage stay of at least 12 hours is required for sample collection. Verifavia will also request a short meeting with key crew members, such as the Captain, First Officer and Chief

Engineer, to explain why they are onboard, the scope of the exercise and the areas of the ship they would like to visit. Typically, the accommodation area, bridge, engine room and deck are key inspection sites.

"For example, boiler insulation would be sampled for asbestos, while paint would be tested for Polychlorinated Biphenyls (PCBs). It's a pretty labour-intensive job and normally we have at least two or three people onboard, sometimes three or four if we have people being trained.

"Because of our marine background, safety is always foremost in our minds, whereas other test service providers use chemists or chemical engineers who don't have the same mindset. We will have a crew member accompanying us throughout the vessel and once our job is finished, we will have a closing meeting with the crew," explains Thakur.

### IHM ignorance

Verifavia is predominantly consulted for vessels in service, with close to 230 vessels having been signed for conducting IHM audits by the company so far. Thakur says there remains widespread ignorance about the nature of EU SRR and HKC, and this is contributing to conflicting information and application of standards. "The purpose of IHM is not just to have a document onboard but that 10 years down the line, at the end of a vessel's life, is that the ship recycler has this document and understands that before touching a particular segment of the vessel, he should take precautions for handling those hazardous materials."

India remains one of the world's major recycling hubs, with data published in July by the NGO Shipbreaking Platform indicating that 116 vessels were sent for breaking there in the first half of 2019 (second only to Bangladesh, with 156 vessels). But no Indian yards have yet been included on the European List of approved recycling facilities. Although many Indian yards have been issued Statements of Compliance (SOCs) by classification societies indicating that they meet HKC requirements, the consistency of these standards has been widely questioned.

Thakur says that Verifavia, with a team that includes experience of handling recycling projects, is keen to lend its support

to the relevant authorities. "What has happened, particularly with regard to India, is that there has been no voice on the ground from the country of origin. I've discussed it with a local class society and told them they should really be at the forefront of backing these regulations... At the end of the day it should be about making the lives of shipyard workers better."

For the present, however, he says the emphasis is on consolidating the early success of the IHM verification service which, given it is applicable to all vessels

over 500gt, is considerable. "One of our strengths is that we have people in all parts of the world and in terms of IHM survey we cover the region from China and Hong Kong, to Singapore and India, through to Dubai and Europe, which is pretty good for a company only founded a few years ago.

"I understand that, at the moment, the major preoccupation for shipowners is scrubbers, but as an industry it's time to push shipping companies, particularly the smaller players who aren't onboard yet, towards IHM." NA

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