

IHM ADVANCES THE CAUSE FOR RESPONSIBLE SHIP RECYCLING

By **Richard Halfhide**



SEA2CRADLE HAS OVERSEEN NUMEROUS HIGH-PROFILE RECYCLING PROJECTS, INCLUDING CRUISE SHIP *CARNIVAL FANTASY* (PICTURE 2012). SOURCE: CREATIVE COMMONS

Nearly a year has passed since it became mandatory for all EU-flagged vessels, or non-EU flagged vessels calling at EU ports, to hold an Inventory of Hazardous Materials (IHM) onboard as part of the EU Ship Recycling Regulation (SRR). Those same rules also make it mandatory for EU-flagged vessels to be recycled only at EU-approved facilities.

“For almost all projects where we get involved now there is already an IHM in place,” says Bert van Grieken, commercial director for ship recycling consultants Sea2Cradle. “The quality can vary somewhat and we don’t take it at face value. We want to make sure that when it is sent to recyclers we have a good understanding of what’s onboard. Firstly, so that a proper plan can be drawn up, but also because we don’t want to expose our people to anything that we could have foreseen.”

The Netherlands-based company has more than two decades of experience with ship recycling projects, having originally been founded under the auspices of container line P&O Nedlloyd after it was challenged by Greenpeace about the dangerous, polluting methods by which its vessels were disposed of. Ten years ago, having been dissolved by then-owners Maersk, the founders established the current entity.

Sea2Cradle doesn’t recycle ships itself, but provides assistance to owners in how to dispose of their assets in a responsible manner. Van Grieken explains: “We help them in finding the right recycling yard for their vessel, setting up the proper contracts and basically arranging everything that needs to be arranged and then monitoring that recycling is actually being done properly.

“We’re quite picky in the projects we do because the owners have to believe in certain standards. For example, don’t work with recycling on the beaches of

the Indian subcontinent, because we don’t believe that that is up to our standards.”

Recycling consultation

The recycling of any vessel is a complex process, but for Sea2Cradle any consultation begins with a discussion with the owner about what’s important to them and the minimum requirements that they aspire towards. Although vessels may be registered under flags of convenience, meaning they are not subject to the same rules concerning EU-listed facilities, a growing number are choosing to meet the higher standards. IHM is split into three parts; Part I, which is required for newbuildings and ships in operation; and Parts II and III, which relates to operationally generated wastes and stores. The latter two only come into play as part of the preparation for recycling, as a prerequisite for the issuance of a Ready for Recycling Certificate (RfRC), which in turns requires the selection of an appropriate approved facility.

Sea2Cradle doesn’t buy or sell vessels itself, but can assist the owner in drawing up a shortlist of candidate yards and then engage them in the tendering process on the yard’s behalf, ensuring that the contract adheres to the agreed standards. “The facility will already have a ship recycling facility plan that we would have looked at in the yard selection process, but a specific plan of attack needs to be written on how they’re going to approach that particular vessel based on its characteristics and the hazardous materials onboard,” says van Grieken.

Because a vessel bound for recycling is considered hazardous waste, it is also subject to the laws concerning the transboundary movement of such materials under the Basel Convention and European Waste Shipment, which require an export permit. Sea2Cradle undertakes this work on the shipowner’s behalf as well as overseeing any outstanding operations and technical preparations, such as pre-cleaning of tanks, prior to the ship’s final voyage. Once it arrives, the company then serves as the



owner's eyes on the ground; monitoring the recycling process, issuing regular reports on its progress, and highlighting any areas of concern.

The physical demolition and recycling of a vessel can take anywhere from six weeks to a year, depending on its size and complexity. Van Grieken says that some owners like to begin the preparatory work years in advance so that they are prepared for all eventualities as a vessel approaches its next special survey. This can entail setting up the recycling strategy two or three years prior to the final voyage, but doing so can significantly expedite the disposal process.

Hazardous materials

One of the benefits of IHM is that it's established a standard methodology for what hazardous materials to look for and what the threshold should be. In terms of those materials asbestos, heavy metals in paint, and PCBs in antifouling coatings continue to prove problematic. Tankers and offshore vessels are also often subject to mercury contamination, the clean up which is highly challenging.

"The good thing about IHM and some of the hazardous materials listed in Annex I is they're being phased, so over the years you see less asbestos, PCBs and PFOS. But it's still a challenge and just because asbestos isn't allowed on newbuilds doesn't mean you don't find it because it can still be found in spare parts such as gaskets. What is asbestos in our part of the world might be considered asbestos free in other parts. So you should always be carefully checking those," says van Grieken.

However, he thinks the prohibition of many of the worst offenders in newbuilding construction is making a huge difference. The next step towards greener shipbuilding could come from a more modular approach during the construction phase that makes recycling easier. Although 90-95% of a vessel is comprised of steel, which can be recycled, other materials such as insulation and panelling, particularly on cruise ships, is pure waste. "On land there's increased focus on modular building and circularity from the start. But look at the amount of work that goes into the demolition of the interior of a cruise ship and the low recycling rate."

Improving transparency

While it's likely that the EU's mandate on the use of approved facilities is redressing some of the problems associated with ship recycling, it remains a murky world of cash buyers and flags of convenience, with abuses and safety violations regularly highlighted by lobby group the NGO Shipbreaking Alliance.

"I think the real problem is the loopholes," opines van Grieken. "Flags of convenience, especially the end-of-life flags, are easy to put on your vessel with few requirements... But the other option is to apply regulation not just on flag state but on where the owner's based. The other option is to use the rules already in place and try and enforce them, like waste shipment regulations, which are based on where the vessel has been trading. We see more interest from authorities to enforce those regulations, but a lot more could be done." ■

