

Isle of Man Ship Registry Technical Advisory Notice

Inventory of Hazardous Materials - Asbestos

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1. Introduction

An Inventory of Hazardous Materials ('IHM') is currently required by the EU Ship Recycling Regulations. Further information on this is provided in [TAN 004-19](#). The purpose of this notice is to provide guidance to owners/operators where an IHM reveals Asbestos Containing Materials ('ACMs') on board a ship. The correct course of action will depend upon whether or not the ACM installation complies with SOLAS Regulations.

2. SOLAS Regulations on ACM Installations (SOLAS II-1/3-5)

SOLAS Regulations permit ACMs to be on board a vessel depending on their date of installation, as follows:

- Ships constructed before 1st July 2002 are permitted to have existing ACMs installations on board.
- Between 1st July 2002 and 31st December 2010, new installations of ACMs are only permitted on ships for the following specified purposes:
 - Vanes used in rotary compressors and rotary vane vacuum pumps
 - Watertight joints and linings used for the circulation of fluids when, at high temperature (in excess of 350oC) or pressure (in excess of 7 / 106 PA), there is a risk of fire, corrosion or toxicity; and
 - Supple and flexible thermal insulation assemblies used for temperatures above 1,000oC
- From 1st January 2011, new installation of ACMs on board all ships is prohibited.

3. Course of Action

If the ACM installation was made in compliance with the above regulations then it is not necessary to remove the ACM as long as it does not pose a risk to health and no exemption or equivalence is required. However, the ACM should be managed and crew should be aware of the dangers of asbestos and know how to deal with asbestos in case disturbance of the ACM cannot be avoided.

If the ACM installation is not in compliance with above regulations, action should be taken to have it removed. The removal – assigned to professional asbestos removal companies – should take place within a time frame of 3 years from the date when the contravention is found. In such cases the Isle of Man Ship Registry should be notified when the contravention is found, together with an action plan for the management and removal of the ACM. If this is found to be satisfactory, an exemption will be issued.

An exception to the above paragraph exists with respect to asbestos-containing gaskets installed between 1 July 2002 and 31 December 2010 in contravention of SOLAS regulation



II-1/3.5 so long as they remain in good condition. Subject to the approval of the Ship Registry the vessel may implement a risk-based maintenance and monitoring programme in accordance with the Guidelines for maintenance and monitoring of on-board materials containing asbestos (MSC.1/Circ.1045), instead of the removal of the ACM within 3 years as stated above. The asbestos-containing gaskets concerned should subsequently be removed when planned repairs or removal of the relevant system (containing these gaskets) is carried out. If approved by the Ship Registry, an equivalence must be issued under SOLAS Regulation I/5. Please contact Marine.Survey@gov.im prior to implementation of the monitoring programme where this facility is required.

In all cases where ACMs are present on a ship in contravention of SOLAS II-1 Regulation 3-5, the operator must have in place a Management Plan based upon MSC/Circ.1045.

4. Further Information

Please see the following IMO circulars for further information:

- MSC.1/Circ.1374/Rev.1 – Information on Prohibiting the use Asbestos on Board Ships
- MSC.1/Circ.1379 – Unified Interpretation of SOLAS Regulation II-1/3-5
- MSC/Circ.1045 – Guidelines for Maintenance and Monitoring of On-Board Materials Containing Asbestos

Please note - The Isle of Man Ship Registry cannot give legal advice. Where this document provides guidance on the law it should not be regarded as definitive. The way the law applies to any particular case can vary according to circumstances - for example, from vessel to vessel. You should consider seeking independent legal advice if you are unsure of your own legal position.

