



MARINE ENVIRONMENT PROTECTION  
COMMITTEE  
58th session  
Agenda item 3

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## RECYCLING OF SHIPS

### Response to IMO Secretariat's enquiry to ISO regarding MEPC 57/3/14

#### Submitted by the International Standards Organization (ISO)

#### SUMMARY

<b><i>Executive summary:</i></b>	ISO is currently developing the ISO 30000 series of management systems standards relating to ship recycling. This paper answers the questions posed in paragraph 18 of MEPC 57/3/14, clarifies related matters and provides the current status of the ISO work items
<b><i>Strategic direction:</i></b>	7.1
<b><i>High-level action:</i></b>	7.1.2
<b><i>Planned output:</i></b>	7.1.2.1 and 7.1.2.2
<b><i>Action to be taken:</i></b>	Paragraph 11
<b><i>Related documents:</i></b>	MEPC 55/3/3; MEPC/ISRWG 3/INF.3; MEPC 57/3/2; MEPC 57/3/14; MEPC 57/21; MSC 75/ISWG/INF.2 and A 22/C.2/WP.3/Add.1

#### Introduction

1 This document outlines to MEPC 58 the ISO response, following the Committee's agreement (MEPC 57/21, paragraphs 3.40 to 3.43) to instruct the Secretariat to continue its liaison with ISO with a view to obtaining the information described in paragraph 18 of document MEPC 57/3/14 and making it available to the Committee for action as appropriate.

#### Background and general comments

2 ISO fully supports an effective, strong and proactive liaison with IMO. While ISO has had the NGO status with the IMO since 1961, the active participation and support was dramatically increased in 1995 based on discussions held with the Deputy Director, Maritime Safety Division.

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3 The IMO Secretary-General suggested that ISO could be of assistance by providing ISO standards that would facilitate the uniform industry implementation of IMO developed requirements. That has been the approach followed ever since by ISO – providing supporting assistance without conflict or overlap – and has been routinely and successfully accomplished.

4 The ISO Secretary-General designated the Chairman of ISO/TC8 as the main focal point with IMO, responsible for coordinating all ISO matters with IMO.

5 Since 1995, an IMO Liaison Officer has actively participated in ISO/TC8 and has attended ISO meetings. The ISO/TC8 Chair has routinely attended MSC and MEPC meetings. ISO also attends IMO Sub-Committees, e.g., DE, FP, NAV, and participates in working and correspondence groups.

6 All ISO/TC8 work items relating to IMO are assigned a “NR” by ISO for cross referencing with IMO. The complete work programme and status of ISO/TC8 is maintained in a database document, TC8 N 1000, which is updated on a regular basis and is made available to the IMO Secretariat.

7 ISO Secretary-General, Alan Bryden, commented: “ISO consensus based standards constitute an important technical complement to different areas of IMO’s work. That is why ISO co-operates closely with IMO to develop standards that support IMO requirements and regulations, while carefully avoiding any overlap. Together, ISO and IMO provide a strong concerted contribution to not only ensuring a cleaner and sustainable marine environment, but also contributing to the occupational health and safety of the workers.”

#### **Response to questions in paragraph 18 of MEPC 57/3/14**

8 Q 1: *What exactly are the ISO 30000 series? Are they for the management system only or do they include specific requirements on the facility, its equipment and techniques, as implied in the title “best practice for ship recycling facility”? Who are involved in the development? Is there sufficient representation of recycling industries of wide geographical areas?*

A: The certifiable standard is ISO 30000 which is a management systems standard. It is based on the world leading environmental management system standard ISO 14001 and is compatible with ISO 9001. ISO management standards provide industry with a systematic approach for planning, implementing, reviewing, and identifying deviations, corrective actions and continuous improvement.

Continuous improvement is not customary in government regulatory documents. This is not a criticism, but is normal because of the lengthy and legal government process to implement change.

The comment on “Best practice” should refer to ISO 30001 – it is not in the ISO 30000 management standard itself, but in one of the associated standards. It should be noted that “best practice” is not a requirement and ISO standards cannot make specific requirements on a facility or anyone.

The questions “who are involved and is there sufficient representation...” have been answered before, most recently in MEPC 57/3/2 (paragraphs 7 and 8). It is repeated below:

The following countries have officially designated experts to the working group on ship recycling, which includes all known countries which may claim to perform “ship recycling”: Bangladesh, China, France, Germany, India, Japan, the Netherlands, Portugal, Republic of Korea, Turkey, Ukraine, the United Kingdom and the United States. Additionally the following liaison organizations have named experts: BIMCO, ICS, UNEP (Basel Convention).

We are extremely grateful to these countries and liaisons which have designated experts, and especially to those countries that are providing the outstanding ISO 30000 series Project Leaders: Germany, Japan, the Netherlands, Turkey and the United Kingdom.

It should also be noted that paragraphs 3 through 7 of MEPC 57/3/2 recall that the ISO/TC8 approved the ship recycling work item and established its Working Group in October 2005 and advise the information status provided by ISO to earlier MEPC sessions. This clarifies any possible confusion regarding the decision date of approval to start the ISO work item.

ISO draft documents are passed to all the technical bodies of ISO for distribution and comment from their national industry representatives and are voted on by member standards bodies. The ISO standard publication process is extremely robust and can be found in detail on the ISO website.

9 Q 2: *What schedule is envisaged for the development of each of 30000 series? Why does the ISO aim to urgently finalize the standards to support the IMO target year 2009? Why does ISO not wait for the development of the draft Convention and its Guidelines and try to fill the gap, if any, between the IMO instruments and desirable industry practices, as was the case for the ISO standards on maritime security?*<sup>1</sup>

A. The schedule is to coincide with the convention, so that when the convention is adopted in May 2009, there will be an industry standard to help facilitate uniform industry implementation to assist in compliance with the convention, i.e. “support the convention”. This is not a new approach between ISO and IMO and is not unique to ship recycling.

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<sup>1</sup> Regarding the notation on maritime security in paragraph 18, the dates are accurate; however, it should be noted that ISO did not wait to start work on maritime security. ISO advised IMO at the 22nd session of the Assembly of the ISO work on the development of standards relating to maritime security, provided a status report to the MSC 75 in MSC 75/ISWG/INF.2 and advised IMO of the planned participation of ISO in the MSC (ISWG) and to provide other assistance. ISO maintained a continuing dialog and active participation in the MSC (ISWG) and its successor MSC (MSWG), providing numerous presentations and inputs throughout the entire period of the ISWG/MSWG and continued to advise the IMO MSC of ISO status. Furthermore, the IMO and ISO made several presentations on the topic together in numerous fora around the world.

Regarding the ISO 28000 work it should be further noted that IMO engaged the WCO by a “Memorandum of Agreement” to take the lead on cargo security. ISO commenced work with WCO immediately concurrent with WCO’s start of the “SAFE Framework of Standards”. In October 2007, the WCO Secretary General, Michel Danet, “praised the working partnership in which the ISO 28000 series standards have been developed: clearly the co-operation between the WCO and ISO is set to continue and strengthen as our work is complementary and supportive”. ISO continued to provide status updates to the IMO throughout the entire development process and publication of the ISO 28000 series. The support to, and coordination with IMO in maritime security is a clear example of early and close participation and dialog resulting in industry standards that are being widely accepted in support of the government requirements worldwide.

The current schedule shows that all work items are approved and registered in the ISO system. Two of the items are published:

- ISO/PAS 30000 has been published on 2008-01-17, it is publicly available; and
- ISO/PAS 30003 has been published on 2008-06-30, it is publicly available.

The remainder is as follows:

- ISO 30001 (Turkey) – a Working Draft (WD) is under development;
- ISO 30002 (the Netherlands) – a Working Draft (WD) is being circulated for comment;
- ISO 30004 (United Kingdom) – a Working Draft (WD) is under development;
- ISO 30005 (Germany) – a Working Draft (WD) will soon be circulated for comment;
- ISO 30006 (Japan) – a Working Draft (WD) is being circulated for comment; and
- ISO 30007 (Japan) - a Working Draft is being circulated for comment.

Individual ISO/PAS are expected to be completed in about one year.

The progress on ISO 30006 and 30007 since our report to MEPC 57 is noteworthy. We commend our Project Leader (Japan) for his outstanding work. Note also that ISO 30005 (Germany) and ISO 30006 (Japan) which relate to hazardous materials are under the leadership of the same two countries who are engaged in leading this topic at IMO.

As we have stated repeatedly, ISO 30000 series is and will be completely compatible with the convention. ISO has stated that, if anything will change in the IMO convention or related guidelines, ISO will follow immediately to avoid any contradiction between IMO requirements and ISO standards. If anyone advises us of any technical incompatibility, our standards will be amended accordingly. We would note that to-date, such observations have not been made, and neither does MEPC 57/3/14.

10 Q 3: *What are the target users, and what is the timing? Are the 30000 series on the recycling facility (30000 to 30004) intended to be used only before the finalization of the Facility Guidelines and will be abolished once the Facility Guidelines are adopted? Alternatively, are they intended to supplement the Facility Guidelines? Are they intended to be used for non-party facilities?*

A. The target “users” are multiple. An obvious “user” is the ship recycling facilities “to provide them with a system and framework to demonstrate compliance with the IMO convention and other applicable requirements. A second “user” is the shipowner such that he can be shown accredited certification of compliance so that he can have confidence in the facilities that he selects for recycling. Potential target users are:

- ISO 30000 and 30001: anyone in the ship recycling chain – maritime supply industry, shipbuilding/ repair yards, ship owners, ship recyclers, transporters for disposal of scrap and hazardous waste;
- ISO 30002: Ship recycling facilities and ship owners, possibly others;
- ISO 30003: Auditing and Certifying Bodies;
- ISO 30004: Anyone implementing ISO 30000;
- ISO 30005: Maritime supply industry, shipbuilding yards, ship owners, ship recyclers<sup>2</sup>;
- ISO 30006: Experts preparing the inventory of hazardous materials<sup>2</sup>; and
- ISO 30007: Ship recyclers, maybe ship yards for repair / conversion<sup>2</sup>.

The question on timing is already answered above, in response to Q2 – What is the schedule?

ISO standards are voluntary and can be implemented anywhere, also on non-Party facilities. ISO standards can be incorporated by ship recycling facilities prior to entry into force, and independently, of the IMO convention and to direct and support the development/upgrading of facilities in the transition period. The “short time gap” is a point which supports the early ISO actions. History has shown that ratification time has been difficult to predict.

ISO does not set requirements! ISO standards do not form a counterpart to any legal requirements, it is only assured that a systematic approach is implemented in the industry to comply with legal requirements. Therefore there is no overlap, but a “supportive atmosphere” to IMO.

The ISO 30000 series is not limited to the 30000 to 30004 in the above question, nor are those standards limited to use at the recycling facilities. ISO standards can be used by anyone who so chooses in the ship recycling chain (e.g., maritime supply industry and shipbuilding and repair yards, ship owners, ship recyclers, transporters for disposal of scrap and hazardous waste) and are applicable to all ships, all types, all sizes, in all trades - international, domestic, inland waters, and shore side facilities and industries. Implementation of these standards might even assist ratification, as the IMO requirements are fulfilled and the facilities might then urge their recycling State to become a Party to the convention, for assuring availability of recycling tonnage. Again, this can be a “win-win” situation and clearly shows the non-conflicting and reciprocal supportive nature.

### **Action requested of the Committee**

- 11 The Committee is invited to take note of the above response from ISO.

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<sup>2</sup> Note: ISO 30005, 30006 and 30007 – hazardous materials including asbestos- may well have application beyond ship recycling due to the environmental nature of the standards impacting the entire supply chain; ships entering repair/overhaul, routine inspections of a ship throughout its entire life cycle.