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SGS IHM

Uncovering the Myths of IHM and IHM-Maintenance

Part 2: IHM-Development and Laboratories

Find Part 1 – Introduction here:

https://www.linkedin.com/posts/henning-gramann-23614328_part-1-of-a-series-of-articles-with-clear-activity-6721360688117293056-T_fr

From **December 31st 2020** onwards all EU-flagged as well as all EU-visiting ships above 500GT have to have a **certified and maintained IHM Part I** onboard. In case compliance can't be verified during PSC-inspections, severe financial penalties up to imprisonment are possible consequences.

The requirements for development of IHMs are provided in IHM-Guidelines (Res. MEPC 269(68)) related to Hong Kong International Convention for Safe and Environmentally Sound Recycling of Ships of IMO (Hong Kong Convention, HKC). The EU-Ship Recycling Regulation (EU-SRR) has similar requirements and further non-mandatory "Best Practice Guidance" is provided by EMSA.

IHMs for **existing ships** are the responsibility of the owner who usually hires third-party IHM-Experts. The substances of Table A / Appendix 1 are required to be investigated at a minimum and other substances of Table B / EU-Annex 2 only should be covered "as far as practicable". Once samples have been taken, they have to be analysed. The MEPC.269(68) describes the use of **appropriate testing methods** executed by a laboratory, working in accordance with international standards (for example ISO 17025 or equivalent). This assures the reporting of reliable data for all parties involved in the IHM process.

Sadly, a reoccurring myth that is often raised to shipowners from certain "Hazmat Experts" is that IHM-Experts must not have their own laboratory as these can't provide **independent IHM-services**. This is mis-guidance and only presenting lack of proper knowledge, and fairness.

Fact is, that it's the duty of the IHM Expert to ensure that laboratories used are **properly accredited and also apply the required analysis standards** including a systematic approach for quality and compliance. There is no need to differentiate between internal and external laboratories. Additionally, it needs to be considered that e.g. evidence is always available in form of e.g. retained sample materials and re-checks are possible to be performed when questioned, or demanded by clients. Because proper laboratories have to store samples for a certain period of time according to their accreditation and approvals.

The competition is tough for IHM services and some external labs offer lump-sums on per ship basis for analysis services. In such a case it seems much more likely that if an IHM-Expert takes more samples than calculated by the lab, that samples will not be processed properly, or raise prices for future projects. In case an IHM-Expert has signed a bigger contract with fixed prices based on the lump-sums mentioned before, his calculation might turn negative for him.

What is additionally noteworthy is the fact, that independent of utilization of inhouse or external laboratories, they have to hold a valid accreditation for the combination of two out of three listed analysis methods for asbestos. Due to cost pressure many laboratories apply only one method (PLM) without combining it with the second method (SEM or XRD). The latter two cost around 5 times more than PLM. This results in cheaper but formally incompliant IHMs and huge risks in the long run, even though such IHMs still get certified due to lack of awareness. This cost saving by formal incompliance create a competitive advantage for the IHM Expert. Probably such experts will not remain in the market after the IHM-boom is over due to their paramount risks they've created for themselves in these busy times. The risks will then be remaining with the shipowners who saved money by hiring the cheapest IHM-Expert.

Nothing lasts longer than quality, happiness about a good price is soon forgotten

Please watch out for follow-up articles providing detailed insights and support for IHM-compliance.