A SHIP RECYCLING FACILITY IN UK

Site Assessment Report – Application 42

European Commission Directorate-General for the Environment

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Objective:

To document the results of the site inspection at Dales Marine Services Ltd., located in Leith (Scotland, UK) following the facility's application for inclusion in the European List of ship recycling facilities.

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1 EXECUTIVE SUMMARY

The objective of this report is to document the results of the site inspection at Dales Marine Services Ltd (Leith), located in Scotland, UK, following the facility's application for inclusion in the European List of ship recycling facilities. The on-site inspection took place on the 27th and 28th of April 2021.

During the site inspection, the applicant demonstrated their management and execution of ship recycling performed at their facility, together with their interaction with relevant governing authorities.

The applicant appears in general to have a well running facility with a suitable organisation, a proven track record, has procedures with regards to health and safety and has in place facilities which one would expect for a facility applying for inclusion in the European List of ship recycling facilities.

The procedures and facilities provided by the applicant do offer the arrangements well prepared for the decommissioning and dismantling of ships for the purpose of further transfer to the qualified and licenced recycling centres. The applicant's facilities appeared to be kept well maintained in controlled service order to allow the ship-recycling duties to be carried out in a safe and secure manner. Working procedures as well as project management practices were observed well implemented and followed by the employees.

The governing document for the site inspection, defining the baseline of the facility's performance, is the Ship Recycling Facility Plan (SRFP). A principal task of the site inspection was to verify that the SRFP is a living, logical and systematic document accurately reflecting the operational practices at the facility.

The facility did not have an environmental monitoring program that meets the requirements of the EU SRR at the time of the site inspection but has subsequently forwarded details of their environmental monitoring programme and monitoring reports for air, noise, water, soil and sediment.

Based on the site inspection and additional information received from the applicant, the evaluators find that the applicant fulfils the relevant requirements of the EU Ship Recycling Regulation.

2 INTRODUCTION

The European Commission DG Environment (hereafter referred to as The Commission) has contracted DNV to conduct a site inspection of the recycling facility Dales Marine Services Ltd, located in Scotland, UK, hereafter referred to as the Facility. An application for inclusion in the European List of ship recycling facilities has been registered for this facility under application number 42.

3 OBJECTIVE

The objective of the on-site inspection is to verify compliance of the facility with the requirements set out in Article 13, 15 and 16 of the Ship Recycling Regulation and clarified in the 2016 Technical guidance note[1].

Hereunder the objectives of DNV's methodology is to:

- Verify the Facility's capability to comply with the regulations and requirements listed in the assessment scope
- Assure that documented recycling processes, work procedures, quality controls and document handling are managed and implemented as specified in the regulations and requirements
- Ensure that the Facility has sufficient knowledge and understanding of the regulations and requirements for recycling facilities
- Assure consistent evaluation of facilities on equal terms

4 SCOPE OF WORK

The scope of the assessment is, according to contract:

- Ship recycling regulation (EU) No 1257/2013
- Technical guidance note under Regulation (EU) No 1257/2013 on ship recycling

This inspection also considered article 13(1) of the Ship Recycling Regulation: "In order to be included in the European List, a ship recycling facility shall comply with the following requirements, in accordance with the relevant Hong Kong Convention provisions and taking into account the relevant guidelines of the IMO, the ILO, the Basel Convention and of the Stockholm Convention on Persistent Organic Pollutants".

The scope for the assessment methodology is divided into three main elements and a number of second and third level sub-elements. These practical steps ensured that all article 13, 15 and 16 SRR requirements for inclusion of a ship recycling facility in the European List were checked.

1. **Management**
    - Facility business model and quality statement
    - Policy
    - Management, ownership and organisation
    - Quality assurance systems and certificates
    - Human resources (availability, skills and experience, training, stability etc.)

[1] C/2016/1900, Communication from the Commission — Requirements and procedure for inclusion of facilities located in third countries in the European List of ship recycling facilities — Technical guidance note under Regulation (EU) No 1257/2013 on ship recycling.

2. **Safety, security and the environment**

- Safety & health (PPE, hazardous materials, fire safety, medical services etc.)
- Security
- Environment (spills, emissions, etc.)
- Emergency preparedness and response (fire, medical, environmental etc.)
- Regional conditions (acts of nature, political, etc.)

3. **Vessel demolition**

- Applied rules, regulations and internal standards
- Recycling control, inspection and supervision regime
- Non-conformities and corrective actions
- Document control
- Facilities (methods, capacities, condition of equipment, logistics, etc.))
- Maintenance
- Recycling planning and execution
- Methodology, criteria and performance regarding:
  - Project start-up, commercial process etc.
  - Ship Recycling Facility Plan (SRFP)
  - Contract review, verification and acceptance criteria owner / cash-buyer / facility
  - Pre-planning
  - Vessel preparation (IHM, Ship Recycling Plan, flag state clearance, pre-cleaning etc.)
  - Vessel arrival and securing
  - Demolition management (methodology, “safe for entry”, “safe for hot work”, working at heights, lifting, supervision and reporting)
  - Waste disposal (sorting, sub-contractors, end users)
  - Completion instruction
  - Project close-out with de-briefing, lessons learned, suggestions for improvement

5 METHODOLOGY AND ACTIVITIES

The methodology followed the framework of DNV's facility assessment protocols and reporting formats, calibrated with the requirements and criteria of the Ship Recycling Regulation as clarified in the 2016 Technical guidance note.

Activities:

- Preparations, scheduling, travel arrangements, fact-finding, etc.
- Issue objective, scope and schedule to facility in advance
- Site assessment (2 days; 3 assessors)
- Reporting
- Issue of draft report
- Implement comments to the draft report
- Final report

The on-site assessment was performed according to a schedule advised to the Facility in advance, incorporating:

- Opening meeting
  - Introductions, present objective, scope and methodology, agree on schedule
  - Review of facility history, current activities, future ambitions
- Interviews with key responsible personnel in all relevant disciplines, including
  - Ownership and management
  - Contracts
  - Planning, preparations, vessel arrival and securing
  - Quality assurance, quality management systems
  - Human resources
  - Health, safety, security and environment
  - Vessel dismantling management
  - Quality control, document control
  - Project management
- Document review
  - Spot checks and evaluation of consistency, content, validation and language. Traceability
- Facility site inspection
  - Inspection of Facility, all workstations and worker facilities
  - Inspection of vessel, for access and escape-ways
  - Spot-checks of worker certificates and permits, crane certificates
  - Lifting equipment, fall barriers, safe for entry, safe for hot-work etc.

- Questioning (brief) of foremen / supervisors on key procedures

- Closing meeting
  - Reiterate the objective of the inspection and present preliminary results in way of initial observations and findings
  - Facility may respond to the initial results, and agree to rectify non-conformities including deadlines and corresponding responsible persons
  - Acknowledgements and departure

6 RESULTS OF THE ASSESSMENT

The site inspection of the facility was carried out on the 27th and 28th of April 2021 at Dales Marine Services Ltd, located in Leith, Edinburgh, Scotland, UK.

The company dates back to 1987 and the facility has been involved in the ship recycling business in Leith since 2017.

The main representatives from the facility during the inspections were [redacted] and [redacted].

The evaluators from DNV were [redacted] and [redacted].

The evaluators also held an online meeting with the national authority Scottish Environmental Protection Agency (SEPA) on 11th May 2021.

The facility had 37 employees at the time of the site inspection. The Facility is located in the Port of Leith on the outskirts of the city of Edinburgh (population of around 500,000), approximately 7 km (5 miles) from the city centre. The Port of Leith is said to be Scotland's largest enclosed deep-water port, that serves amongst others the offshore oil, gas and renewables industry as a mobilisation/demobilisation base, cruise terminal and a cargo handling. In the near vicinity, ca. 300m, lies a major retail facility and tourist attraction.

The table below summarises the results of the site inspection with respect to article 13, 15 and 16 of the SRR requirements for inclusion of a ship recycling facility in the European List.

DNV wishes to thank the management and key personnel at Dales Marine Services Ltd for the friendly reception and good cooperation and assistance during the inspections, ensuring that we were well cared for and that everything went smoothly. The facilities for the assessment were excellent and the fullest degree of access to all aspects of the facility's areas and management was offered.

Site inspection results			Compliant?
Article 13-1 (a) it is authorised by its competent authorities to conduct ship recycling operation			
Technical guidance note 2.2.1, MEPC 210(63) Section 3.2.2	Authorisation	The facility is authorised to conduct ship recycling operations by the national authority Scottish Environmental Protection Agency (SEPA).	Compliance was confirmed during the inspection.
Article 13-1 (b) it is designed, constructed and operated in a safe and environmentally sound manner			
Technical guidance note 2.2.1	Measures and infrastructure	The facility uses the dry-dock method for ship recycling, although preliminary activities referred to as "soft stripping "are performed alongside the quayside prior to moving the vessel to be recycled into the dry-dock. Once in the dry-dock the vessel is contained within an impermeable floor with drainage. Dismantled materials from the vessel are transferred to shore by cranes. A general cargo vessel (Nuclear Fuel Carrier) was alongside the wet berth during the site inspection, it was evident that removal (by cutting-away) of the superstructure has been performed at this location. The evaluators did not witness any lifting of cut materials nor the transfer of any waste materials. It was perceived during the site visit that the facility's shipyard operating methods were comparable with those encountered at other UK shipyards. The Yard facilities comprised of the following main items: - Dry-dock with pumping station and floating-gate - Project control and manning station - Machinery and service workshop - Main Office Building - Approx. 200 m long concrete-edged mooring quay	Compliance was confirmed during the inspection.

		The site was found compact, well maintained in good service and with clean conditions. Attention to Safe Working standards appears to be a focus point for both the work force and the management/administration levels. This is made clear to employees as well as visitors. The transportation roads to/from the Yard were found due for improvements, but the distant location of the production areas should be recognized as beneficial.	
Article 13-1 (c) it operates from built structures			
Technical guidance note 2.2.4	Operates from built structures	The facility uses primarily the dry-dock method for ship recycling. The operations are performed from built structures, with cranes. Upon arrival at the facility a vessel is moored at the wet-berth. At this location a process referred to as “soft-stripping” is said to be performed, this includes inspection and removal of non-hazardous and hazardous materials and liquids. The facility explained that this work was only performed using hand tools – however during the site inspection it became apparent that hot-work was also being performed in this process. The evaluators found that as such the operating procedures did not fully reflect the actual operations being performed – and the applicant is recommended to update the procedures and plans to reflect the actual operations of the facility in this regard. The facility is equipped with a number of mobile cranes, hired in accordance with the lifting capacity to satisfy the needs of individual projects, as well as the workshop gantry crane was found well maintained in certified order with the updated service and maintenance records. No defects or deficiencies were revealed by overall visual examination of cherry picker, forklifts as well as other miscellaneous hand-tools or service installations. Centralised materials and tools distribution system appeared to be well controlled in good order. Consumable materials, including bottled gases, kept safe-stored and monitored . The facility operates with the principle of using a vessel’s hull as a built structure during primary cutting, with the intention that all slag and debris is to be captured by the hull as far as is possible.	Compliance was confirmed during the inspection.

		A vessel undergoing repair work was in the dry-dock at the time of the inspection. The solid and clean environment of the dry-dock bottom seems to confirm good implementation of working orders and safe practices.	
Article 13(1) (d) it establishes management and monitoring systems, procedures and techniques which have the purpose of preventing, reducing, minimising and to the extent practicable eliminating health risks to the workers concerned and to the population in the vicinity of the ship recycling facility, and adverse effects on the environment caused by ship recycling			
Technical guidance note 2.1.4 (a), (b) MEPC210(63) Section 3.4.1 / BC TG 6.2	General	The facility did not have an environmental monitoring program that meets the requirements of the EU SRR at the time of the site inspection. The evaluators find for operations in the dry-dock that the physical infrastructure lessens the potential impact on the environment with regards soil and sediment, however, based upon the finding that hot work and removal of hazardous materials is also performed at the wet-berth the requirement for environmental monitoring including these parameters is justified. After the site inspection the applicant forwarded a description of its environmental monitoring program in the document titled ENV-P-077 and results as described in the rows below. The description of the environmental monitoring program is good.	Compliance was confirmed after the inspection.
	Noise	After the site inspection, the applicant has developed a noise monitoring programme. Reportedly, the applicant will have daily checks, carried out by the QHSE Advisor, to ensure there are no excessive periods of continual high noise levels. All decommissioning operatives should be wearing ear protection while carrying out decommissioning works. Recorded noise level checks should be carried out at a minimum of 2 times during the wet berth decommissioning process for all vessels decommissioned on site with results recorded and kept on file. Calibrated noise monitor must be used for sampling. The applicant forwarded a workplace noise measurement report dated 11.03.2021. The report has been prepared the independent company [redacted] and was found adequate.	Compliance was confirmed after the inspection.

	Air	After the site inspection, the applicant has developed an air monitoring programme. Reportedly, the applicant will have daily visual checks, carried out by the Decommissioning Manager and the QHSE Advisor, to ensure there are no signs of airborne contaminant particles. Recorded air particle checks should be carried out at a minimum of 2 times during the wet berth decommissioning process for all vessels decommissioned on site with results recorded and kept on file. Calibrated air particle monitor must be used for sampling. The applicant forwarded an Environmental Air Quality Sampling at Leith Harbour, Edinburgh report dated 03.12.2021. The report has been prepared by the independent company [redacted] and was found adequate.	Compliance was confirmed after the inspection.
	Water	After the site inspection, the applicant has developed a water monitoring programme. Reportedly, the applicant will have daily visual checks, carried out by the Decommissioning Manager and the QHSE Advisor, to ensure there are no signs of water contamination around the vessel. All transfers of liquids from vessel to tankers will be monitored to ensure there are no leaks. Spill kits/booms available at quayside in case of emergency. Test sample of harbour water at wet berth should be taken at the completion of wet berth decommissioning process for all vessels decommissioned on site with results recorded and kept on file. The applicant forwarded a Soil, Sediment and Water Contamination test report dated 19.01.2022. The report has been prepared by the independent company [redacted] and was found adequate. Results of laboratory testing have been assessed against various well-established standards as described on page 3 of the [redacted] report.	Compliance was confirmed after the inspection.
	Soil	After the site inspection, the applicant has developed a soil monitoring programme. Reportedly, the applicant will have daily visual checks, carried out by the Decommissioning Manager and the QHSE Advisor, to ensure there are no signs of soil contamination where removed steel sections are being handled and processed by sheering equipment. Soil samples to be taken from quayside handling area and processing area at the completion of decommissioning process for all vessels decommissioned on site with results recorded and kept on file.	Compliance was confirmed after the inspection.

		The applicant forwarded s Soil, Sediment and Water Contamination test report dated 19.01.2022. The report has been prepared by the independent company [redacted] and was found adequate. Results of laboratory testing have been assessed against various well-established standards as described on page 3 of the [redacted] report.	
	Sediment	After the site inspection, the applicant has developed a sediment monitoring programme. Sediment samples will be taken from wet berth area at the completion of the wet berth decommissioning process for all vessels decommissioned on site with results recorded and kept on file. Palintest SK200 Soil Fertility Kit to be used for sampling. The applicant forwarded s Soil, Sediment and Water Contamination test report dated 19.01.2022. The report has been prepared by the independent company [redacted] and was found adequate. Results of laboratory testing have been assessed against various well-established standards as described on page 3 of the [redacted] report.	Compliance was confirmed after the inspection.
Technical guidance note 2.1.4 (b),	Health	The yard conducts regular medical monitoring of its employees. All employees are required to undergo a baseline pre-employment assessment. Medical surveillance is then performed annually, by a doctor, in accordance with health and safety at work regulations. Records are held in secure personnel files.	Compliance was confirmed during the inspection.
2.1.4 Technical guidance note 2.1.4 (b), MEPC 210(63) 3.1.1 (5), (7) and (8).	ISO / management system / QMS	The facility is ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 certified by [redacted] a UKAS accredited provider of management systems certification. Document control is conducted with the necessary revision and approval dates, management signatures and other formalities is found in order.	Compliance was confirmed during the inspection.
ILO SHG p21-23, p138:18.1, 18.3, p139:18.5	Workers facilities	The workers have access to toilets, showers and wardrobes. Break/coffee/lunchrooms found in service order. Drinking water is available. Smoking is not allowed unless in designated and identified areas. (In some instances, private accommodation is arranged by the SRF for workers).	Compliance was confirmed during the inspection.

Article 13 (1) (e) it prepares a ship recycling facility plan			
Technical guidance note 2.1.2	SRFP	The SRFP is the cornerstone document of the ship recycling facility and should fully describe the operations and procedures that are in place at the facility to ensure compliance with the EU Ship Recycling Regulation. There is no document number, revision number or date of revision provided. The applicant should consider inclusion of such details. The SRFP is found to cover the key chapters required, and that the description of the methods employed is clear and logical. The evaluators do however have a general comment – parts of the document appear to be more suited to a management system review rather than an instruction to personnel at the facility.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.1.1 (1)	Ownership	Dales Marine Services have headquarters in Aberdeen, Scotland, UK and operate at 5 locations in Scotland. The site in Leith is leased from Forth Ports. Dales Marine Services have held a long-term lease of the dry-dock since 2010. Dales Marine Services have been approved by SEPA for performing recycling at the facility since November 2017. <u>Note:</u> The applicant informed the evaluators after the site inspection of a change of registered address. The new address of Dales Marine Services Ltd is: Dales Business Centre, 25 York Street, Aberdeen, UK, AB11 5DP.	The desk assessment showed compliance with this point.
MEPC 210(63) Section 3.1.1 (3), (4)	Facility organisation	The facility organization in the SRFP was generally found to represent the organisation at the time of the site inspection. One difference found was that the HSE Advisor listed is no longer employed by the facility. A replacement has been recruited and at the time of the assessment was said to be about to commence initiation.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.1.1 (4)	Roles and responsibilities	Based on the provided information, the evaluators find that the applicant has provided an adequate overview of the roles with transparently delegated responsibilities at the facility.	Compliance was confirmed during the inspection.

MEPC 210(63) Section 3.1.1 (6)	Policy	The facility has a QHSE policy in Appx A 1.1.3 in the SRFP The policy is with regard the facility's overall operations, and not ship recycling specific. The applicant is recommended to include ship recycling specifically in their QHSE policy.	Compliance was confirmed during the inspection.
	Working hours and annual leave	Normal working hours are Mon-Thurs 8am-4.30pm, Fri 8am-3.30pm. When required ,overtime will be paid as per employees contracted rates. Shifts will be a maximum of 12 hours with at least one day off per week. Employees have a contractual right to annual leave of 25 days + statutory 9 days, totalling 34 days – according to sample employment contract provided to the evaluators.	Compliance was confirmed after the inspection.
	Contracts and minimum wage	A sample contract of employment was provided to the evaluators.	Compliance was confirmed during inspection.
MEPC 210(63) Section 3.1.1 (7)	Instructions and procedures	Working instruction, warning signs and posters are clearly visible at working places. Placards with basic information and daily instructions including copies of the Company's Safety Policy is displayed at entrance to the Main Building. (*ref. photo-evidence from site-tour*) Safety Posters and reminders were found well displayed in appropriate work-locations thru workshop, control centre dry-dock entrance gates.	Compliance was confirmed during inspection.
MEPC 210(63) Section 3.1.4	Project management progress reporting	Project management including progress monitoring is performed by the Decommissioning Operation Manager. No formal project management or progress reporting was found, but it was demonstrated that the facility maintains very good control of their projects.	Compliance was confirmed during inspection.
Article 13 (1) (f): it prevents adverse effects on human health and the environment, including the demonstration of the control of any leakage, in particular in intertidal zones;			
Technical guidance note 2.2, 2.2.1, p8: footnote (26), 2.2.2 (f), MEPC 210(63) Section	Intertidal zone Control of leakage Preventive actions	The facility is located in a deepwater sea-locked port, as such there is no tidal range to consider. For operations performed in the dry-dock the facility demonstrated sound management of preventing adverse effects to health and environment.	Compliance was confirmed after the inspection.

3.4.4.3/BC TG: p13: Table 1, p33: Table 5, p44: 4.1 / ILO SHG: p65: 7.2.4.4		During the site inspection the facility explained how they manage operations at the wet-berth. The evaluators found that the operations and hazards associated with work at the wet-berth are not as well identified, mitigated for, and documented. The applicant was requested to update the SRFP with practical instructions to workers on the issues addressed above. In response to the draft report the applicant replied that the SRFP is to be read along with DMS Operational Procedures and risk assessments – which are referred to in the SRFP. The procedures/risk assessments cover all site activities – ship repair, conversion and decommissioning, welding and fabrication so are included as part of the company management system and are available to be read alongside the SRFP. A copy of the document register was forwarded, showing full extent of integrated management system. In addition, HS-ERP-004 – Decommissioning EPRP has been revised to include Person in Water (SRFP p.140). While decommissioning work is going on there will be; 2x lifebuoys at quayside (1 Fwd & 1 Aft); 1 x boat hook at the stairs to the water to aid lifting person from the water; 2x serviceable life buoys on the outboard side of the vessel being worked on and man basket available to the crane at all times when decommissioning work is in operation. They cover activities in the dock as well as attending vessels for afloat repairs. Reportedly, the procedures/risk assessments are available to all personnel from the Decommissioning Managers office, T-card station at end of gangway and can be requested from any Manager onsite as access is available through the shared drive on the computer.	
Article 13 (1) (g) (i); the containment of all hazardous materials present on board during the entire ship recycling process so as to prevent any release of those materials into the environment; and in addition, the handling of hazardous materials, and of waste generated during the ship recycling process, only on impermeable floors with effective drainage systems;			
Technical guidance note 2.2.2, MEPC 210(63) Section 3.3.4.3 / BC TG: p78ff: 5.3, p67: figure 6	Cutting areas	Primary and secondary cutting is said in the SRFP to be performed in the dry-dock only, it was though established during the site inspection that cutting is also performed at the wet-berth. A vessel in the dry-dock is said to be cut in sequence of horizontal levels, starting with the forward part of the vessel. The whole disassembly process/plan is based on internal cuttings only, with access from existing decks, platforms, stringers, etc. This to reduce risks imposed by use of external scaffolds, stages etc. The evaluators were explained that every morning the Decommissioning Operations	Compliance was confirmed after the inspection.

		Manager is providing the cutting plan for the day, which is recorded and monitored in the "Daily Log Book of the Vessel Dismantling Operations". Steel work is said to be either lowered down to the dock floor for cutting into smaller sections or lifted-off by crane to the dry-dock wall or directly to the transport vehicle of the disposal subcontractor. The applicant was asked to revise the SRFP to reflect the full extent of the operations performed at the wet-berth. In response to the draft report the applicant has updated the SRFP (p. 66). It is now stated that vessels will be delivered to the wet berth where deck machinery will be removed, internal accommodation units stripped, interior bulkheads and upper structure removed ensuring integrity of the vessel is maintained in order for a safe voyage from wet berth to dry dock.	
Technical guidance note 2.2.2, MEPC210(63) Section p34: 3.4.4.1	Drainage	The drainage system for the dry-dock is well described in the SRFP and was found to match that which was found during the site inspection. The dry-dock floor is inclined in sections so as to ensure that any rainwater or spillages is channelled to the correct sumps. Temporary drainage barriers were also said to be implemented if considered to be necessary in advance of planned operations. The dry-dock floor, granite blocks and mortaring were found to be in good condition and are considered to be performing the function of an impermeable floor.	Compliance was confirmed during the site inspection.
Technical guidance note 2.1.4, 2.2.2, 2.2.3, 2.2.5, 3.5, MEPC 210(63) Section 3.4.2.5 / BC TG 3.1, 3.3, 3.4.3, 4.1, 5.1, 5.2 (Zone D), 5.3 (Zone D), p92, Table 11	Waste and hazardous waste storage	The applicant explained that they endeavour to operate an on-demand/just-in-time approach to the waste collection by their sub-contractors. One of the objectives of this is to alleviate the need to store waste and hazardous waste at the facility. The work principal is based on "no-waste-storage" at Yard. All segregated waste materials are transferred-out on daily basis by vehicles to facilities of the licenced recycling sub-contractors. However, the said activity was not available for confirmation by the site-tour observations, but review of the following evidence: - Daily Logbook records, - Waste Transfer/Disposal Notes in individual project archives,	Compliance was confirmed during the inspection.

		seems to confirm declared procedures. There were no waste-storage facilities or waste-collecting points identified at the Facility by the site-tour examinations.	
Article 13 (1) (g) (ii): that all waste generated from the ship recycling activity and their quantities are documented and are only transferred to waste management facilities, including waste recycling facilities, authorised to deal with their treatment without endangering human health and in an environmentally sound manner;			
Technical guidance note 2.1.4, 2.2.2, 2.2.3, 2.2.5, 3.5, MEPC 210(63) Section 3.4.2, 3.4.3/ BC TG p11, p12, p48ff: 41, p50ff: 4.2,	Waste management	It is a requirement that all wastes generated from the ship recycling activity are properly documented. The 2016 Technical Guidance clarifies this further in section 2.2.2, where it is written: All elements separated from the ship, including large blocks, constitute either 'hazardous materials' or 'waste generated during the ship recycling process'. No storage of used components at the SRF was observed. The SRF's facilities are compact with restriction of limited area therefore storage of waste materials or components for reselling is not easily achievable. The yard as an owner of the "scrap-vessel" does not take any active part in selling of goods or components unless upon initiative from cooperants or sub-contractors.	Compliance was confirmed during the inspection.
Technical guidance note 2.1.4, 2.2.2, 2.2.3, 2.2.5, 3.6, MEPC 210(63) Section 3.4.2, 3.4.3/ BC TG p11, p45ff: 7. / 4.2	Waste disposal	The facility has explained and demonstrated, through provision of copies of waste disposal company's WMLs that they utilise waste disposal facilities authorised by SEPA. Please refer to Article 15(2) (a) below for further details.	Compliance was confirmed during the site inspection.
Article 13 (1) (h); it establishes and maintain an emergency preparedness and response plan; ensures rapid access for emergency response equipment, such as fire-fighting equipment and vehicles, ambulances and cranes, to the ship and all areas of the ship recycling facility;			
Technical guidance note 2.1.3, MEPC 210(63) Section 3.3.5/ BC TG p3, p5/6, p47, p56, p63/64/65/66/6	Emergency preparedness and response plan	The Emergency Preparedness and Response Plan (EPRP) was discussed during the site inspection. The evaluators found that whilst in general the EPRP was sufficient there were some aspects with regards to working on the quayside and a vessel at the wet berth that could have been assessed and given more specific instructions.	Compliance was confirmed after the inspection.

7, p70, p81, p83, p87, p89/ ILO SHG p32: 4.6, p 49: 7.1.8, p 128:16.		During the site inspection the facility provided an updated section of the EPRP covering the scenarios discussed with the evaluators. This was a positive step and the evaluators recommend that these scenarios are also included in the drills plan for the facility. It should also be considered to provide a minimum life-rescuing equipment along mooring quay for the "Man-overboard Emergency Response Operations" (e.g. life buoys with long rope, or long handled pole, or rescue boat with rescue equipment, and portable manually activated alarm siren) The evaluators recommend that the applicant ensures that the updated EPRP is well implemented on-site. The Fire Emergency Drill, including sound alarm and staff-allocation system are carried out on a weekly basis during working hours on a pre-defined day. The relevant information to clients, visitors and sub-contractors is included in the Induction Course as well as being displayed at the entrance on the Daily Information Board. The drills are recorded in a separate Yard's Safety Events booklet, and subject for periodical audit reviews.	
Technical guidance not 2.2.4, MEPC 210(63) Section 3.2.1	Emergency access routes	Emergency access routes and assembly stations were marked. Multiple (4) escape routes from the dry-dock were found to be kept clean and free from obstructions or limitations. Escape from a dry-docked vessel is assured by two gangways at each side of the ship, one of which is for emergency use only. The access route to ships for ambulances and fire trucks was seen to be good during the inspection.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.2.1	Access and logistics within facility	The main accessways were found to be open and tidy, with good logistics.	Compliance was confirmed during the inspection.
Technical guidelines 2.1.4 (b), MEPC 210(63) Section 3.2.1, 3.3.5, ILO SHG, Section 3.6	Medical services and facilities	Public hospitals are said to be available within 10mins by ambulance. Independent checks show major emergency hospitals are located within 10km, with minor health-support services also available located closer to the facility. The EPRP includes the phone numbers to the emergency services, including the ambulance service.	Compliance was confirmed during the inspection.

		The facility has a first-aid station on the ground floor of the office building. The nominated and trained first-aiders are made known via information on the entrance Information Board. A stretcher is available for confined space entry, although this is an emergency backup only as such rescue is to be performed by the local emergency services.	
Technical guidelines 2.1.4 (b), MEPC.210(63), Section 3.3.1, 3.3.4.11	Regulatory requirements health and safety	The facility is certified to ISO 45001 applicable for "Ships Conversion and Repair Services, Ship Decommissioning Services, General Fabrication and Welding Services". This is not required by law, nor does it demonstrate compliance with the law, but it does demonstrate a structured framework is implemented for ensuring a safe and healthy workplace. In some respects, it can be considered to be going beyond the requirements of the law. Much of the UK's health and safety law has originated in Europe – and is considered on this basis to be broadly equivalent to European law. The basis of the UK health and safety law is the Health and Safety at Work Act of 1974. The Act defines the general duties which employers have towards employees and members of the public, and employees have to themselves and to each other. These duties are qualified in the Act by the principle of "so far as is reasonably practicable". The UK Health and Safety Executive (HSE) is the national regulator. The Scottish Environmental Protection Agency (SEPA) is the competent authority in Scotland.	Compliance was confirmed during the inspection.
Article 13 (1) (i) it provides for worker safety and training, including ensuring the use of personal protective equipment for operations requiring such use;			
Technical guidance note 2.3.1	Safety inspectors on site	The facility has a role titled "HSE Advisor". This role is stated to be responsible for; co-ordination of accident and incident reporting, investigations and root cause analysis, reporting of accidents to the Managing Director and promotion of lessons learned to the workforce. The HSE Advisor is said to be able to be identified on site by a "HSE Advisor" label on their boiler suit and by use of a white safety helmet. This identification was not though seen during the site visit, as the HSE Advisor was not present. At the time of the site inspection this position was not filled, the previous holder of the position had recently left the company. A replacement has been recruited but not yet commenced employment. In	Compliance was confirmed during the inspection.

		the meantime, the responsibilities of the role were being handled by the HSEQ Manager, the QA co-ordinator and the Decommissioning Operations Manager. The participation and assistance of the applicant's HSEQ Manager was of the great support to the site inspection, but an interview with local H&S Advisor would have been beneficial for recognition and assessment of the safety culture implementation.	
Technical guidance note 2.3.2	Condition of safety equipment	Safety equipment was in general found in good condition, kept well maintained and controlled. No overdue items were identified by spot-checks during the site-tour, including periodical examinations of portable fire-fighting equipment .	Compliance was confirmed during the inspection.
Technical guidance note 2.3.3, MEPC 210(63) Section 3.1.2/3.2.2	Safety induction and training, employees	The facility has an extensive Training & Competency procedure. A training matrix is also maintained. Particular provisions and practical training are made for new employees. Both these documents were discussed during the site inspection, and the facility demonstrated good management of the identification of the need, implementation and maintenance of training activities.	Compliance was confirmed during inspection.
Technical guidance note 2.3.3, MEPC 210(63) Section 3.1.2/3.2.2	Safety induction and training, subcontractors	All visitors (non-employees) are required to view an induction DVD. A Nominated Responsible Person (NRP) is said to be defined for each subcontractor. The NRP is said to be given a site safety induction before the subcontractor commences work at the facility.	Compliance was confirmed during inspection.
Technical guidance note 2.3.3, MEPC 210(63) Section 3.1.2/3.2.2	Safety induction, visitors	The evaluator was subjected to induction training shortly after arrival. The safety induction was presented in the form of an approx. 15 mins. e-video instruction. The content of the short instruction movie was not limited to the following key information: - Plant introduction - Familiarization with the map of facilities - Indication of major risks associated with main tasks and duties (dry-dock operations, lifting, working in confined spaces, working at heights etc.) - Minimum personal safety equipment requirements	Compliance was confirmed after the inspection.

		- Introduction to Work Permits system - Contact personnel and emergency response numbers - Examples of warning signs The annual safety induction is obligatory for all visitors at site and the records kept maintained in form of continuously updated database. In addition, the instruction regarding limitations imposed by Covid-19 restrictions was given. The information included in the Safety Induction was later verified as updated and easy to follow safe practice routines.	
Technical guidance note 2.3.3, MEPC 210(63) Section 3.1.2/3.2.2	Risk Assessment	The facility operates an integrated management system certified to ISO 9001, ISO14001 & ISO45001. The management system includes procedures & processes for hazard identification & risk assessments. The facility has a dedicated procedure for hazard identification and risk assessment, “HS-OP-001”. This document was not included in the original application documentation but was made available during the inspection. This document is found to provide a systematic process for hazard identification, risk assessment and mitigation planning. It was established that toolbox talks are held daily and prior to any major work commencing, detailing work progress and scope, as well as associated generic and specific risks – and necessary mitigating actions to be taken. Risk Assessments with Method Statements are part of the “Work Permit” systems and were verified in place for standard operations. One non-standard scenario (assembly of electrical light installation) was examined to find the risk assessments being within the job records. The knowledge regarding the job’s Risk Assessments, as part of the Company’s Safety Culture, was identified as being on good level within ad-hoc interviewed personnel. Routines of daily “Toolbox Talk”, prior to commencement of the task activities were found well implemented and followed.	Compliance was confirmed during the site inspection.

MEPC 210(63) Section 3.1.2	Hazardous waste handling training	The facility's workers are not licenced to handle hazardous materials. All removal of hazardous materials is said to be performed by licensed contractors. The Decommissioning Operations Manager and the HSE Advisor are though said to have Asbestos Awareness training. This is stated in the Training Matrix too as a note but not included in the respective column of the matrix.	Compliance was confirmed after the site inspection.
MEPC 210(63) Section 3.3.5	Ship access control	The facility has a T-card system for dry-dock and ship access control. This was verified as being well implemented and followed by employees, clients, sub-contractors and visitors.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.5	Prevention of falling from heights	Working at height training is listed in the Training Matrix. It is said that the workers onboard the vessel in the dry-dock are all to be wearing a harness. They must also clip on their lanyard to wires, cut holes or other suitable anchoring points. However, all the observed workers were dressed and equipped appropriate to their current tasks, but work at height was not carried out at time of the site-inspection. Fall preventive measures e.g.: railings, temporary barriers around openings, temporary protection-chains, opening protection covers, etc. were identified to be arranged and maintained in good service-order at the inspected vessel.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.1.8	Safety signage on site	Found to be at a satisfactory level (equivalent to that at other UK shipyards). All entries to major work areas (dry-dock, workshop, office building, ship entry gangways/ladders) were all found equipped with the signs, safety posters and warning labels to satisfactory extent. Safety warning signs easily visible at the workshop locations, machineries, tool-control station etc.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.1.8	Safety signage on vessel	There were no safety signage in use on board of inspected vessel (moored for soft-stripping at quay). The warning labels regarding miscellaneous hazardous materials were found ready for use at ship-entry control station.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.6	Lifting equipment and instructions	The facility stated that the cranes are inspected by a 3rd party every 6 months. An inspection report for a mobile telescopic job crane was sighted by the evaluators.	Compliance was confirmed during the inspection.

		Records of periodical thorough examinations of lifting appliances reviewed and found to be in order. Relevant certification as issued by the examiners was reviewed without findings.	
MEPC 210(63) Section 3.3.4.6	Crane operators' certification	Only one certified crane-operator was present at a time of site-tour – his competence certification was found to be in order. It was mentioned that other workers at site were appointed for relevant training which is due for soon completion and there are other crane drivers available at other locations of Dales Sites (Greenock, Aberdeen).	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.1.2	Training of forklift operator	Spot checked – verified as in place.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.1.2	Certification/ training of cutters	The facility has a well-documented and thorough training and competence procedure. This includes a detailed description of the training of steel workers.	Compliance was confirmed during the inspection.
MEPC 210(63) 3.4.3	Cutting procedures	During the site inspection it was explained that the Decommissioning Operations Manager is responsible for establishing and implementing the cutting plan. The workforce is said to be informed in a morning meeting of the activities planned for the day, including any special situations and how they will be managed. The cutting procedure is conveyed primarily verbally and with the use of sketches/marked-up drawings where needed. The above-mentioned work-process was verified by spot-check of documents archived per project and kept stored in boxes at the Decommissioning Operations Manager's office.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.3 / ILO SHG: p108ff:13.	Steel cutting machines	Gas cutting torches and mechanical shears are said to be used for cutting. This could not be verified during site-inspection as no cutting operations were being performed. The evaluators have no reason to doubt that such equipment is used though.	Compliance was confirmed during the inspection.

ILO SHG: p108ff:13.	Other machinery	A visual examination of randomly selected machineries and tools at the workshop and across the site was concluded during the site assessment without findings.	Compliance was confirmed during the inspection.
ILO SHG: p67:7.2.4.4, p108ff:13.	Winches, mooring gear	Visual spot checks were performed during the site assessment without findings, observations and/or remarks.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.6.	Ropes/chains/ slings	Verified to be in order during site inspection by way of spot checks. Traceability of equipment in use - verified to be in order during site inspection – use of all tools/consumables is recorded via central distribution station with continuously updated log-book records. Any faulty equipment is removed from site for repairs or decommissioning. - visual spot checks of loose gear for lifting equipment was concluded without findings, observations and/or remarks. - periodical examinations are carried out by the independent 3rd Party licenced organizations - random check of records was concluded without findings	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.8	Maintenance and decontamination of tools and equipment	The HSE Advisor performs a monthly site inspection which includes machines & work equipment and housekeeping. Copies of the reports for 2021 were provided to the evaluators. The reports are signed-off by the HSE Advisor and the QHSE Manager.	Compliance was confirmed during the inspection.
ILO SHG 16.1.6	Eyewash	Eyewash is available at several locations at the facility, and in the spill kits which are to be placed nearby areas of hot-work activity. It is the responsibility of the H&S Advisor at site to monitor the levels and replenish as necessary. Verified in order during the site-tour examinations – no outdated liquids were found.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.8	Condition of electrical equipment	No findings and/or observations by visual spot checks. Finding-less examinations were re-enforced by interview with competent electrical engineer (permanent employee at the SRF).	Compliance was confirmed during the inspection.

MEPC 210(63) Section 3.3.4.7	Housekeeping and illumination	In general, good housekeeping was observed during the site inspection, in way of cleaning and tidiness. Lighting was provided in all necessary areas, including the dry-dock, found to be in order and sufficient for tasks and duties at the SRF.	Compliance was confirmed during the inspection.
Technical guidance note 2.1.3, MEPC 210(63) Section 3.3.5/3.3.6 / BC TG: p63: 4.5	Fire station	It was declared that the public fire brigade can be at the facility within 8mins. The SRF said they have held familiarisation exercises with the fire brigade. No such exercises have been held though in the last year due to COVID-19 restrictions.	Compliance was confirmed during the inspection.
ILO SHG: p49: 7.1.7	Instructions and signage	Basic firefighting instructions and warning signage were seen to be in place. These were found to be in standard order (equivalent with other shipyards in the UK) Firefighting teams at the SRF were said to be established with the team-leaders ("Fire Marshals") and "Fire Wardens" announced at the Entrance Information Board *(ref. site tour photo-evidence)*	Compliance was confirmed during the inspection.
Technical guidance note 2.3.3, MEPC 210(63) Section 3.1.2 ILO SHG: 8.8	Fire station manning, fire-fighters	Selected workers are trained in basic firefighting. The facility's fire fighters will only attempt to put out minor fires. If a fire escalates, or is considered to be more significant, the local fire brigade is called.	Compliance was confirmed during the inspection.
ILO SHG: p83: 8.8.8	Fire station equipment	N/A	N/A
MEPC 210(63) Section 3.3.6, ILO SHG: 8.8.11	Fire alarm system on shore	Found to be in working order during site tour.	Compliance was confirmed during the inspection.
ILO SHG: 8.8.11	Fire alarm system on vessel	The facility explained that fire alarms would be manually released on board in case of fire. This would either be the vessel's own alarm system if operational, or alternatively an air horn would be used. Not verified during site tour – it has to be noted that the vessels moored at SRF remain without power. The only electrical power is provided for temporary lighting and tools if necessary. Consequently, the shipborne alarm systems (including ship's horns or sirens) has to be recognised as out of working order.	Compliance was confirmed during the inspection.

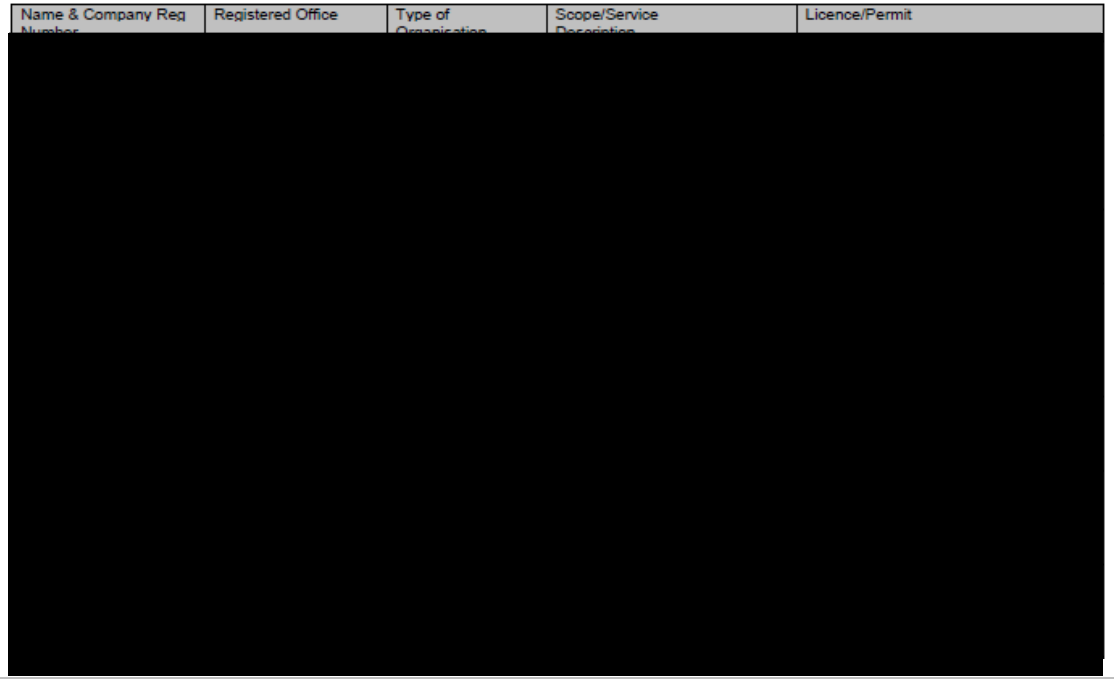
		Note for considerations: the manually initiated portable alarm/evacuation siren for the vessel under soft-stripping or dry-dock scrapping could/should be recommended as a suggestion for improvement. From another point of view all combustible materials are declared to be removed prior commencement of cutting activities, therefore the risk of fires in the combustible-free environment are reduced to minimum.	
Technical guidance note 2.3.3, MEPC 210(63) Section 3.3.6, ILO SHG: 8.8	Fire prevention measures general	The applicant explained that workshop employees attend a fire warden course in their second year of employment. This statement verified as correct – ref. Information Board with Fire Wardens identified for different working areas.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.6, ILO SHG 13.4.5	Combustible materials and hot work	Reportedly all combustible materials are removed before cutting. This was verified by spot checks at the vessel being under soft-stripping, plus reviewed archive records seems to confirm the declared procedure.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.4, ILO SHG 8.8.1, 13.5.2.	Condition of AC/OX lines	The conditions of hoses and connections were seen to be in good service order.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.4	Transporting/ storing flammable gases	Found to be well controlled at storage and working areas.	Compliance was confirmed during the inspection.
MEPC 210(63): p21: 3.3.5, p23: 3.3.6	Fire hydrants	Found to be maintained in good service order.	Compliance was confirmed during the inspection.
ILO SHG: p83: 8.8.10	Fire extinguishers	Found to be maintained in good service. Spot checks carried out without findings and/or remarks. Periodical service labels in place. No overdue items identified.	Compliance was confirmed during the inspection.

MEPC 210(63): p22: 3.3.6, ILO SHG: p82: 8.8.3	Smoking areas	Smoking is permitted in designated smoking areas only. These areas are identified during the visitor's induction session. Verified as well implemented and followed by the employees.	Compliance was confirmed during the inspection.
	Access control to facility; security patrols	The facility is located within the Forth Ports harbour area. Forth Ports maintain access control to the harbour area – this is a gated entrance with 24hr manning. The facility itself has a guarded entrance. Verified in service (24hrs controlled entrance to the Port facilities + guarded entrance to the Yard)	Access control to facility is not a requirement.
ILO SHG 8.4.2	Entrances / gates, fencing	The area of the facility was closed to the road by fencing and gates, otherwise the regular access control to the Forth Ports facilities was in force. The SRF's fencing and gates from the access road-side were found to be maintained in good service-order. It was noted that there is currently no clear division and separation between the SRF's premises and the neighbouring "pipe import/export transfer" company. It was verbally declared however by the SRF that the "pipe-transfer" company will finish their presence by the end of June 2021.	Compliance was confirmed during the inspection.
Technical guidance note 2.3.3, 2.1.4, 2.3.1, MEPC 210(63) Section 3.1.2, 3.1.4, 3.3.4.3, 3.3.6, 3.4.4 / BC TG: p3: figure 1, p84: 6.1, 6.2,	Training	The facility had a training scheme for all workers, with a list of courses and status provided in the Training Matrix. Training records showing the participants were available on-site. Spot check of training records was verified without comments.	Compliance was confirmed during the inspection.
Technical guidance note 2.3.2, MEPC 210(63) Section 3.3.4.10	PPE	The use of PPE was seen to be well implemented, freely and readily available as needed. No person without PPE allowed to enter production areas. Safety Wardens actively reminding obligatory use of eye-protection googles or ear protectors – relevant safety posters at work sites. Safety shoes, gloves and goggles were observed in use by staff in dry dock and machinery workshop. All safety-protective equipment is readily available at the SRF's distribution office.	Compliance was confirmed during inspection.

Article 13 (1) (j): it establishes records on incidents, accidents, occupational diseases and chronic effects and, if requested by its competent authorities, reports any incidents, accidents, occupational diseases or chronic effects causing, or with the potential for causing, risks to workers' safety, human health and the environment;			
Technical guidance note 2.3.4, MEPC 210(63) Section 3.3.4.11 and Appendix IV, ILO conventions	Medical monitoring	Procedures for medical monitoring were documented. Worker accidents, injuries and medical/health records such as occupational health examinations are recorded. In general, the medical monitoring schemes were found to be adequate and well documented in organized records. All new employees are required to undergo an initial pre-employment medical check. Thereafter annual tests are performed by a registered doctor. These tests are said to include; lung, hearing, blood pressure, skin condition.	Compliance was confirmed during the inspection.
	Incident monitoring and reporting	The facility has a dedicated procedure HS-OP-008 "incident reporting and investigation" which is said to be intended to ensure compliance with RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrence Regulations). The procedure defines responsibilities, initial response actions, the extent of reporting and investigation required, expectations for reporting, analysis of information, identification of risk control measures and implementation and verification of actions. A template incident reporting form is also provided in this document. Co-ordination of Incident reporting and subsequent root cause analysis is said to be the responsibility of the H&S Advisor. The QA Co-ordinator is also the SEPA liaison, and in the event of a significant spillage would inform SEPA immediately. The applicant provided an example of near miss incident that had occurred in April 2021. The incident investigation and follow-up actions were explained. The incident report was sighted by the evaluators.	Compliance was confirmed during the inspection.

	Statistics	The QA Co-ordinator explained how monthly policy objective monitoring and reporting is performed, including statistics, for production and quality.	Compliance was confirmed during the inspection.
	Near-miss reporting	All employees are said to be responsible for reporting all accidents, incidents and near misses to the H&S Advisor. Item confirmed as well known to all interviewed employees – also addressed during the Safety Induction movie.	Compliance was confirmed during the inspection.
	Non-conformance procedures	Evidence of actual non-conformance records with cases, actions and mitigations were not witnessed on site, however root cause analyses were verbally confirmed and explained by the QA management.	Compliance was confirmed during the inspection.
	HSE Incentives	A suggestion box is utilised (prizes are awarded for the best suggestion of the month). Records and assignment of awards was reviewed during site visit.	N/A
	Corporate social responsibility	Not subject of verification during site tour. CSR was mentioned only in connection with the SRF's participation in a number of apprenticeships giving an opportunity to local society with co-operation of the technical schools. The SRF's involvement in this programme was visible by number of trainees observed at site.	N/A
Article 13 (2) (a): the operator of a ship recycling facility shall send the ship recycling plan, once approved in accordance with Article 7(3), to the ship owner and the administration or a recognised organisation authorised by it;			
MEPC 210(63) Section 3.2.4, 3.4.2.1	Ship recycling plan	The facility prepares a SRP (which they call Method Statement) for each ship that is to be recycled. A sample Method Statement (for the vessel [redacted] has been provided by the SRF, and is found to be developed generally in accordance with the requirements of Article 7.2 of the EU SRR, however information of the type and amount of hazardous materials and waste to be generated (including location on the vessel) were not found.	Compliance was confirmed during desk assessment.
Article 13 (2) (b): report to the administration that the ship recycling facility is ready in every respect to start the recycling of the ship;			

MEPC 3.2.3-3.2.6	Ready for recycling certificate	As part of the application file, the facility submitted the specific statement concerning the recycling of EU Member States flag ships (part 5 of the application). The SRFP contains a template "Notification of planned start of ship recycling", which includes reference to the requirements of the EU regulations No. 1257/2013.	Compliance was confirmed during desk assessment.
Article 13 (2) (c): when the total or partial recycling of a ship is completed in accordance with this Regulation, within 14 days of the date of the total or partial recycling in accordance with the ship recycling plan, send a statement of completion to the administration which issued the ready for recycling certificate for the ship. The statement of completion shall include a report on incidents and accidents damaging human health and/or the environment, if any.			
MEPC 210(63) Section 3.2.7	Statement of completion	As part of the application file, the facility submitted the specific statement concerning the recycling of EU Member States flag ships (part 5 of the application). A sample Statement-of-Completion has been provided by the applicant. Details provided include vessel name, vessel type, IMO number, year of build, start date and completion date.	Compliance was confirmed during desk assessment.
Article 15(2) (a): identify the permit, license or authorisation granted by its competent authorities to conduct the ship recycling and, where relevant, the permit, license or authorisation granted by the competent authorities to all its contractors and sub-contractors directly involved in the process of ship recycling and specify all information referred to in Article 16(2);			
Technical guidance note 2.2.1, MEPC 210(63) Section 3.2.2	Authorisation	Scottish Environmental Protection Agency (SEPA) Waste management licence WML/L/1157331 issued 3rd November 2017. It is stated in this licence that the facility, in consultation with SEPA, shall review their Working Plan at least once a year to ensure consistency with the licence conditions. SEPA usually perform an annual inspection of the facility, however no such inspection has been performed since the start of the COVID-19 pandemic. The facility provided a copy of the last SEPA inspection report from May 2019. This report states "no breaches" of the environmental limit condition, "high performance" in terms of the environmental management condition, an overall assessment of "excellent". The evaluators have met with SEPA following the site inspection, here SEPA confirmed that site inspections have been performed at the facility, and whilst they do not have access to the records (as	Compliance was confirmed during desk assessment.

		a result of the cyber-attack) the site officer remembers that the facility has scored “excellent” for the entire time he has been in the role. <u>Observation</u> During the desk assessment the facility advised that the SEPA licence was issued prior to leasing the wet berth and laydown area. The facility advised that SEPA have been informed in writing of the extended site area and have accepted it for the Waste Management Licence conditions but do not require the WML to be updated to reflect this.	
MEPC 210(63) p8: 3.1.2, p10: 3.2.2 / BC TG: p38: 3.4.3	Sub-contractors	The facility has provided a list of waste management sub-contractors detailing contact details, type of organisation, service provided and licence/permit details.  Name & Company Reg Number | Registered Office | Type of Organisation | Scope/Service Description | Licence/Permit	Compliance was confirmed during desk assessment.

Article 15 (2) (b): indicate whether the ship recycling plan will be approved by the competent authority through a tacit or explicit procedure, specifying the review period relating to tacit approval, in accordance with national requirements, where applicable;			
MEPC.196(62) Section 5	Explicit or tacit procedure	The current EU List and UK List of Ship Recycling Facilities both indicate that explicit approval of the SRP is to be provided. The facility advised upon request for clarification during the desk assessment that SEPA provide tacit approval of the SRP. The facility advise that SEPA are said to not require to be notified and have advised the applicant that they will not approve every SRP – rather the applicant's Waste Management Licence being in place is their approval. The applicant has advised that they will carry on sending the SRP to SEPA. SEPA are said to have advised the applicant that if they don't hear from them with 14 days that they can assume it is approved. The evaluators have discussed the approval procedure with SEPA following the site inspection, who advise that during the COVID-19 pandemic, and as a result of the cyber-attack they have experienced, that recent ship recycling plans were tacitly approved only. SEPA advise that it is their intention that all SRPs will be approved explicitly in future.	Compliance was confirmed after the inspection.
Article 16 (2) (a): the method of recycling; (b) the type and size of ships that can be recycled; (c) any limitation and conditions under which the ship recycling facility operates, including as regards hazardous waste management; (d) details on the explicit or tacit procedure, as referred to in Article 7(3), for the approval of the ship recycling plan by the competent authority; (e) the maximum annual ship recycling output.			
	Method of recycling	The recycling operation is primarily by dry-docking of the vessel to be recycled. Prior to entering the dry-dock a vessel undergoes a process referred to as "soft-stripping", this includes inspection and removal of non-hazardous and hazardous materials and liquids – and some cutting and removal work of superstructures. See Article 13-1 (c) above for further details.	Compliance confirmed during the inspection.

	Type and size of ships that can be recycled	All types of ships, except rigs. The facility can accept ships with the following maximum ship dimensions: - Width: 20 metres - Length: 165 metres - Draught: 7.7 meters	Compliance confirmed during the inspection.
	Any limitation and conditions	The facility can accept all types of ships, except rigs, with a width limitation of 20m.	Compliance was confirmed during the inspection.
	Maximum annual ship recycling output	There was an error in the original application documentation regarding historic annual ship recycling output. This was discussed during the site assessment and the facility agreed to provide a corrected list, which was subsequently provided. This list however states the maximum annual ship recycling capacity as having been achieved in 2019, with 7415 tonnes LWT (NB: LWT and LDT terms are often used interchangeably). In the UK List of Ship Recycling Facilities the maximum annual ship recycling output is stated as 7275 LDT with a footnote ”According to its permit, the facility is authorised to recycle a maximum of 7 275 LDT per year.” As such the reported figure of 7415 LWT was found in excess of the 7275 LDT figure. However, the SRF also details a figure of tonnage that is “minus owner retained parts / sold parts”. It has been confirmed by the applicant that these items are not included in their total output as defined in the WML. Reportedly, the owner retained/sold parts were removed prior to the vessel arriving onsite and ownership being transferred to Dales and therefore are not included in the reportable waste as it was never received onsite. The total LWT is the reported weight from the stability book which is received with the vessel, but this had not been adjusted by the original owners when vessel arrived with Dales onsite. The quantities reported to SEPA as recycled and NWH to landfill are those quantities that were received onsite.	Compliance was confirmed after the inspection.

		Based on the information provided the evaluators' conclusion is that the maximum annual ship recycling output was achieved in 2019 with 7415 te (total LDT) – 2395.62 te (owner retained/sold) = 5019.38 te (yearly tonnage of waste), which is within the limit defined in the WML.	
Article 15 (2) (c): confirm that it will only accept a ship flying the flag of a Member State for recycling in accordance with this Regulation;			
	Confirmation	Confirmation from the facility has been received that it will only accept a ship flying the flag of a Member State for recycling in accordance with the EU Regulation. Ref. Part 5 of the Application Form.	Compliance was confirmed during desk assessment.
Article 15 (2) (d): provide evidence that the ship recycling facility is capable of establishing, maintaining and monitoring of the safe-for-hot work and safe-for-entry criteria throughout the ship recycling process;			
HKC: p14: R1(7), MEPC 210(63) Section 3.3.4.2 / ILO SHG: p110:13.4	Safe- for- hot work certificate, warning signs and labels	The safe-for-hot work regime was well explained by the facility and the evaluators find that the facility has a well implemented system. The three-copy permit to work process was explained and demonstrated in support of this.	Compliance was confirmed during the inspection.
HKC: p26: R19(2), BC TG: p47: 4.2.1	Confined spaces	The confined space / safe for entry regime was well explained by the facility and the evaluators find that the facility has a well implemented system. The three-copy permit to work process was explained and demonstrated in support of this.	Compliance was confirmed during the inspection.
Article 15 (2) (e): attach a map of the boundary of the ship recycling facility and the location of ship recycling operations within it;			
HKC: p43: 1.5, MEPC 210(63) Section 3.2.1	Map of facility	The facility has included a map of the facility in the original application file. It was though identified that this was not a scaled document, nor did it provide adequate details to obtain a clear overview of the layout, facilities and scale. The provided map was used during the site inspection and the facility advised that an updated and scales layout map was in the process of being produced and would be provided in due course. An updated layout map has been added to SRFP (p. 71) after the site inspection.	Compliance was confirmed after the inspection.
(f) for each hazardous material referred to in Annex I and additional hazardous material which might be part of the structure of a ship, specify:			

(i) whether the ship recycling facility is authorised to carry out the removal of the hazardous material. Where it is so authorised, the relevant personnel authorised to carry out the removal shall be identified, and evidence of their competence shall be provided;			
MEPC 210(63) Section 3.1.3, 3.1.4	Workers' certificates/ licences	The facilities workers are not licenced to carry out removal of hazardous materials. All removal of hazardous materials is said to be performed by licensed contractors. The Decommissioning Operations Manager and the HSE Advisor are though said to have Asbestos Awareness training. The certificate for the Decommissioning Operations Manager was sighted during the site assessment. This is stated in the Training Matrix as a note but not included in the respective column of the matrix.	Compliance was confirmed during the inspection.
(ii) which waste management process will be applied within or outside the ship recycling facility such as incineration, landfilling or another waste treatment method, the name and address of the waste treatment facility if different from that of the ship recycling facility, and provide evidence that the applied process will be carried out without endangering human health and in an environmentally sound manner;			
MEPC.210(63), Section 3.1.1	Regulatory requirements environment	The facility complies with the SEPA requirements for waste management, demonstrated by the issuance of the Waste Management Licence (WML) to the facility. The WML is regulated by the contents of the Waste Management Licensing (Scotland) Regulations 2011 (SI2011 No.228). All details of waste accepted, treated at or transported from the facility is to include the relevant European Waste Catalogue (EWC) Code. The facility is certified to ISO 14001 for Environmental Management and ISO 45001 for Occupational Health and Safety.	Compliance was confirmed during the inspection.
Technical guidance note 2.1.4, MEPC210(63) Section 3.4.1, Appendix 1, BC TG Executive summary (p1), 4.3, 2.1, 2.5, 3.2, 3.4.2, 3.4.4, 4.1, 4.2.2, 4.2.5, 6.2, 7.1, 7.3,	Environmental management	The facility is required to comply with legislation relating to industrial discharge and has satisfied SEPA as to its capability in meeting these requirements with Waste Management Licence (WML) being issued in 2017 along with Part B PPC Permit in place since 2010. SEPA site inspections are said to be performed annually, according to the conditions of the WML. Reports for 2018 and 2019 are said to show no breaches. 2020 inspection did not take place due to COVID-19 restrictions. The applicant has provided upon request the SEPA inspection report from 2019.	Compliance was confirmed during the inspection.

Technical guidance note 2.2.5, MEPC210(63) Section 3.4.2, BC TG: p45: 4.2, ILO SHG: p4: 2.3.2	Management of hazardous waste	The management of hazardous waste is handled by the subcontractors as presented below.	Compliance was confirmed during the inspection.
Technical guidance note 2.2.3, MEPC210(63) Section 3.4.3.1, ILO SHG p90: 9.2.3	Management of asbestos	**Removal** By Licenced Contractor: [redacted] (UK HSE licence number [redacted]) **Storage** Removed direct from vessel offsite by Licenced Contractor **Waste treatment** Removed by Licenced Contractor and treated offsite. Disposal of asbestos is regulated by The Special Waste Amendment (Scotland) Regulations 2004. The SRF advised during the site inspection that [redacted] transport the asbestos waste to SEPA accredited facility [redacted] The waste license was submitted by the applicant after the site inspection. Asbestos waste is landfilled.	Compliance was confirmed after the site inspection.
MEPC210(63) Section 3.4.3.2	Management of polychlorinated biphenyl (PCBs)	**Removal** By Contractor: [redacted] Or [redacted] **Storage** Removed direct from vessel offsite by Contractor or Licenced Contractor **Waste treatment**	Compliance was confirmed after the site inspection.

		Removed by Licenced Contractor and treated at [redacted] based in Wales. [redacted] is specialising in recycling and recovery of end of life heavy electrical equipment and hazardous waste treatment and disposal. [redacted] is licensed to handle hazardous wastes encountered during the recovery of electrical equipment, mercury, asbestos, sulphur hexafluoride (SF6) gas and/or decomposition products, insulating oil and PCBs. [redacted] licensed by the Environment Agency and the Health and Safety Executive. Waste Licence was forwarded by the applicant, license number: [redacted].	
MEPC210(63) Section 3.4.3.3	Management of Ozone-depleting substances (ODS)	**Removal** By Licensed Contractor: [redacted] (FGAS Certificate [redacted]) **Storage** Removed direct from vessel offsite by Licenced Contractor **Waste treatment** Removed by Licensed Contractor and treated offsite.	Compliance was confirmed after the site inspection.
MEPC210(63) Section 3.4.3.4	Management of paints and coating including anti-fouling with organotin TBT	**Precautions** It is understood that the facility identifies if TBT is present. Necessary precautions are then taken for cutting of materials with TBT. The facility bags the debris from cutting which is then collected and disposed of by a Licenced Contractor. **Removal and Storage** By Licensed Contractor: [redacted] Registered with SEPA for carriage of hazardous waste (registration number [redacted]) and hold a SEPA permit to operate a “Part A” installation (permit number [redacted]). **Waste treatment**	Compliance was confirmed after the site inspection.

		[redacted] is licensed to transport and dispose of hazardous and non-hazardous waste. [redacted] is based in Portlethen Industrial Estate south of Aberdeen. They also have operations centres in Elgin, Dundee, Grangemouth, Brampton (Cumbria) and Hetton-le-Hole, County Durham. [redacted] transport the waste to their licensed waste transfer station in Portlethen where it is processed. [redacted] recover and recycle materials, residual material is then disposed of in accordance with current legislation either by [redacted], or by authorised third-party disposal sites.	
MEPC210(63) Section 3.4.3.5	Procedures for operationally generated wastes	**Removal and Storage** Waste oils and fluids are said to be transferred to a bulk container and removed from site directly by the Licenced contractor - [redacted] Registered with SEPA for carriage of hazardous waste (registration number [redacted]) and hold a SEPA permit to operate a "Part A" installation (permit number [redacted]). **Exceptions** Any small amounts are said to be transferred to International Bulk Containers (IBCs) and stored in a bunded area in advance of being removed by the licenced contractor. **Waste treatment** [redacted] is licensed to transport and dispose of hazardous and non-hazardous waste. [redacted] is based in Portlethen Industrial Estate south of Aberdeen. They also have operations centres in Elgin, Dundee, Grangemouth, Brampton (Cumbria) and Hetton-le-Hole, County Durham. [redacted] transport the waste to their licensed waste transfer station in Portlethen where it is processed. [redacted] recover and recycle materials, residual material is then disposed of in accordance with current legislation either by [redacted], or by authorised third-party disposal sites.	Compliance was confirmed after the site inspection.
	Management of perfluorooctane sulfonic acid (PFOS)	**Removal & Storage** By Contractor: [redacted]	Compliance was confirmed after the site inspection.

		Or [redacted] **Waste treatment:** Removed by Licenced Contractor and treated at [redacted] based in Wales. Celtic Recycling is licensed to handle hazardous wastes. Hazardous Waste reportedly includes all materials which have hazardous properties that may render them harmful to human health or the environment. These are identified in The European Waste Catalogue (EWC 2002) and controlled under the Hazardous Waste (England and Wales) Regulations 2005.	
MEPC210(63) Section 3.4.3.6	Management of heavy metals (lead, mercury, cadmium and hexavalent chromium)	**Removal** By Licenced Contractor: [redacted] Waste Management Licence [redacted] **Storage:** Removed direct from vessel offsite by Licenced Contractor. **Waste treatment:** Removed by Licensed Contractor and treated by [redacted] Group which is an AATF (Approved Authorised Treatment Facility) for waste electricals large domestic appliances and fridges, cables and metals. [redacted] operate high-tech shredders for ferrous, non-ferrous and waste electrical equipment.	Compliance was confirmed after the site inspection.
MEPC210(63) Section 3.4.3.7	Other hazardous materials in Annex II	**Removal, Storage & Waste treatment** Removed by Licenced Contractor and treated at [redacted]. based in Wales. [redacted] is licensed to handle hazardous wastes. Hazardous Waste reportedly includes all materials which have hazardous properties that may render them harmful to human health or the environment. These are identified in The European Waste Catalogue (EWC 2002) and controlled under the Hazardous Waste (England and Wales) Regulations 2005. The Environment Agency has recently updated guidance on the disposal of WEEE waste (Waste and Electrical and Electronic Equipment), which contain POPs (Persistent Organic Pollutants). The new	Compliance was confirmed after the site inspection.

		guidance now imposes that all electrical items containing above a certain threshold of POPs must be disposed through high temperature incineration, rather than recycling.	
MEPC210(63) Section 3.4.2.2	Additional sampling and analysis	The Decommissioning Manager and the HSE Advisor will evaluate if there is any items potentially containing hazardous material PCHM and if they have any concerns then they will arrange sampling and testing. To demonstrate the process the applicant provided an example ACM sampling report from another of their sites (Greenock, Scotland, UK) . The report documented the sampling performed by a 3rd party company – the sampling locations being stipulated by the applicant.	Compliance was confirmed during the site inspection.
MEPC210(63) Section 3.4.2.3	Identification, marking and labelling	The facility is responsible for marking and labelling hazardous materials onboard the vessel ref. SRFP Part A Sec 3.3 page 8. The exception being for Asbestos – where the SRF's workforce will not be onboard or commence work until the licenced contractor has removed the asbestos, decontaminated and provided evidence of air quality/cleanliness.	Compliance was confirmed during the inspection.
Technical guidance note 2.2.5 (a), MEPC210(63) Section 3.4.2	Transport of waste	The facility explained the chain of responsibility for transportation of waste; including the weighing of waste at the facility and confirmatory at the receiving facility. All waste is said to be transported by Licensed Contractors. Please refer to Article 15 (2) above.	Compliance was confirmed after the site inspection.
Article 15 (2) (g) confirm that the company adopted a ship recycling facility plan, taking into account the relevant IMO guidelines;			
		Please refer to Article 13 (1) (e) above in this table.	
Article (2) (h): provide the information necessary to identify the ship recycling facility.			
		Please refer to Article 13 (1) (a) above in this table.	
Article 15 (5): For the purposes of Article 13, with regard to the waste recovery or disposal operation concerned, environmentally sound management may only be assumed to be in place provided the ship recycling company can demonstrate that the waste management facility which receives the waste will be operated in accordance with human health and environmental protection standards that are broadly equivalent to relevant international and Union standards.			

Technical guidance note 2.2.5 (c)	Waste management facilities	The facility has explained and provided documentation to show that licensed contractors remove, store and ensure transportation of hazardous waste to downstream waste management facilities. Ensuring sustainable downstream management of wastes generated by the ship dismantling activities is an important requirement under the EU Ship Recycling Regulation. Section 2.2.5 in the EU Technical guidance note provides specific information on the requirements for non-EU facilities to demonstrate that the waste management facilities follow standards broadly equivalent to international and EU standards. The requirements/standards applied in the waste management facilities must ensure a similar level of protection of human health and the environment as in international/EU standards. The various international and EU standards are listed under section 2.2.5. UK waste regulations are considered to be broadly equivalent to the relevant EU standards with identical waste codes (EAL). The facility has provided the details of the licences and permits for the waste management facilities used. Following the site inspection of the facility, the evaluators also had a separate meeting with SEPA. The regulatory regime and monitoring processes was explained and found to be broadly equivalent to EU standards.	Compliance was confirmed after the inspection.

7 PHOTOS FROM INSPECTION

Information Board in Entrance Hall to Office Building

General view of dry-dock and dry-dock side

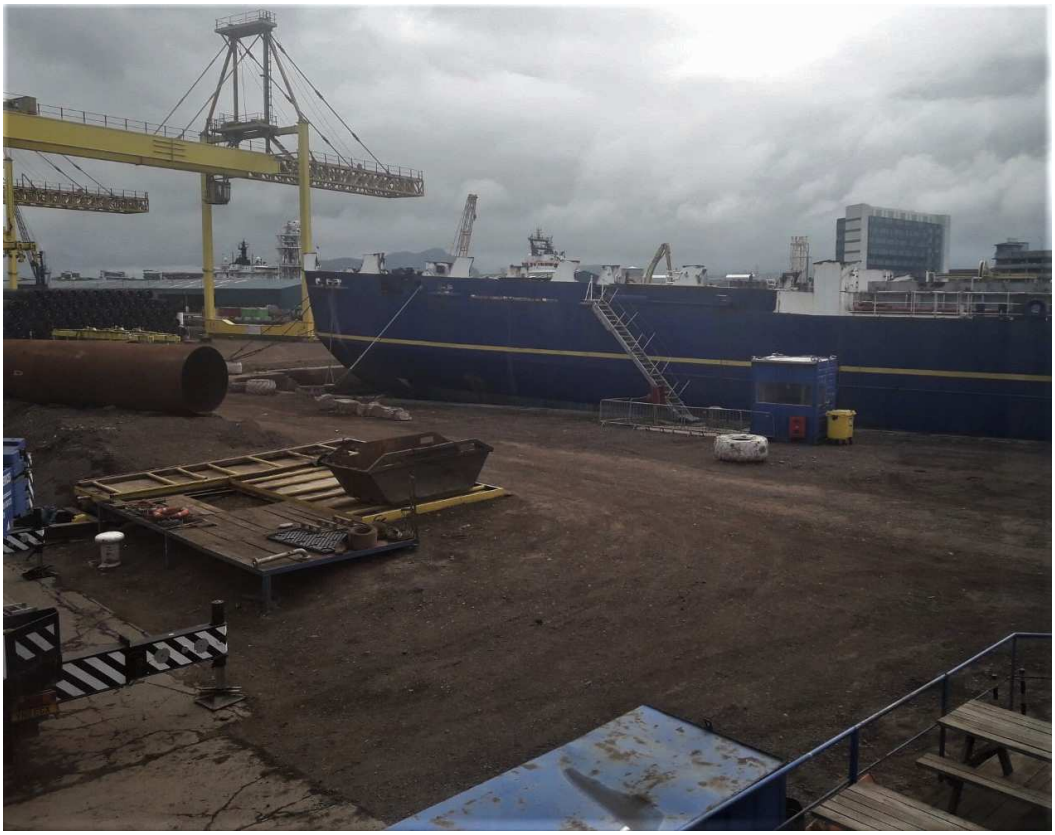
Vessel at wet-berth, post soft-stripping

Gangway access and work control station for vessel at wet-berth

Main work control office

Workshops and Office building

SRF general view – wet berth area (two supply vessels in waiting)



SRF general view

About DNV

DNV is the independent expert in risk management and assurance, operating in more than 100 countries. Through its broad experience and deep expertise DNV advances safety and sustainable performance, sets industry benchmarks, and inspires and invents solutions.

Whether assessing a new ship design, optimizing the performance of a wind farm, analyzing sensor data from a gas pipeline or certifying a food company's supply chain, DNV enables its customers and their stakeholders to make critical decisions with confidence.

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