DNV

A SHIP RECYCLING FACILITY IN UK

Site Assessment Report – Application 50

European Commission Directorate-General for the Environment

Report No.: 2022-0220, Rev. 0
Date: 2022-02-21

Project name:	A ship recycling facility in UK	DNV AS Maritime
Report title:	Site Assessment Report – Application 50	Environment Advisory
Customer:	European Commission Directorate-General for the Environment,	Veritasveien 1 1363 Høvik
Customer contact:	[redacted]	Norway
Date of issue:	2022-02-21	Tel:
Project No.:	10306030	
Organisation unit:	Environment Advisory	
Report No.:	2022-0220, Rev. 0	

Applicable contract(s) governing the provision of this Report:

Objective:

To document the results of the site inspection at Kishorn Port Limited, located in Kishorn (Scotland, UK) following the facility's application for inclusion in the European List of ship recycling facilities.

Prepared by:	Verified by:	Approved by:
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Keywords:

Ship recycling, ship recycling facility plan, hazardous waste, waste management, health, safety

Rev. No.	Date	Reason for Issue	Prepared by	Verified by	Approved by
0	2022-02-21	First issue	mardav	eifre	tsv

Table of contents

1 EXECUTIVE SUMMARY

The objective of this report is to document the results of the site inspection at Kishorn Port Limited (Kishorn), 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 8th and 9th of February 2022.

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 to have a well running facility, 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 facility is utilised by primary contractors who are responsible for the recycling projects being executed. The facility performs a thorough evaluation of all primary contractors in advance of recycling project to ensure that the facility's requirements with regard safety, health, environment and quality are met. Throughout the recycling projects there is daily collaboration between the primary contractor and the facility, and the facility performs regular inspections of the recycling operations to verify compliance with the agreed methods.

Primary contractors were present during the site inspection and provided verbal and documentary evidence of their competence, qualifications, training, planning, execution and record keeping.

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.

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 Kishorn Port limited, 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 50.

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 8th and 9th of February 2022 at Kishorn Port Limited, located in Kishorn, Scotland, UK.

The Facility is located by the Loch Kishorn which is a sea loch in the north-west Highlands of Scotland. Kishorn used to be a fabrication yard for oil platforms and other offshore facilities, with an associated port and dry-dock facility.

Leiths and Ferguson Transport have created a new joint venture company, Kishorn Port Limited, which will use the dry dock for recycling of vessels, while other parts of the facility is planned for manufacturing to the offshore renewables industry.

The facility has major port developments planned, including extending the dry-dock to be able to accommodate vessel up to 250 meters of length. The facility had a few full times employees at the time of the site inspection. The operation of the facility will rely heavily on licensed contractors for all aspects of the recycling process.

The main representatives from the facility during the inspections were [redacted] and [redacted] all from Kishorn Port Limited. In addition, [redacted] (Marine Consultant), [redacted]) and [redacted] participated in parts of the inspection.

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

The evaluators have previously, in connection with a separate assessment, held an online meeting with the national authority Scottish Environmental Protection Agency (SEPA) on 11th May 2021.

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 Kishorn Port Limited 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. Once in the dry-dock the vessel is contained within an impermeable floor with drainage. Dismantled materials from the vessel are stored in the dry-dock before it is transported out. For the first dismantling project, scrap steel was loaded to a vessel transporting the steel directly to the steel mill. The [redacted] FPSO was laid up in the dry-dock during the site inspection and the dry-dock was flooded. No dismantling were taking place during the inspection; hence the evaluators did not witness any lifting of cut materials nor the transfer of any waste materials. It was however perceived during the site visit that the facility's shipyard operating methods were comparable with those encountered at other UK shipyards. The site was found well maintained in good service and with clean conditions. Attention to safe working standards appears to be a focus point for both the facility and its contractors.	Compliance was confirmed during the inspection.
Article 13-1 (c) it operates from built structures			
Technical guidance note 2.2.4	Operates from built structures	The facility will use the dry-dock method for ship recycling. The operations are performed from built structures, with cranes. The facility will hire in cranes with the lifting capacity to satisfy the needs of individual projects. The facility had a crane on-site with 100 tons capacity, which was found well maintained in certified order with the updated service and maintenance records.	Compliance was confirmed during the inspection.

		A FPSO undergoing repair work was in the dry-dock at the time of the inspection. The solid and clean environment 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 evaluators find for operations in the dry-dock that the physical infrastructure lessens the potential impact on the environment with regards soil and sediment. The applicant has conducted ground water monitoring and commissioned a company to prepare an ecological survey report, including otter, pine marten and badger. The facility has forwarded a Site Monitoring Plan in SHEQ09.4 10/10/21 and price quotes from Derwentside Environmental Testing Services Ltd (DETS). This company is part of the Suez Group and is accredited to analyse all relevant parameters.	Compliance was confirmed during the inspection.
	Noise	The facility has previously contracted the company [redacted] to conduct noise measurements. The report is titled 'Assessment of the Environmental Impact of Noise, Kishorn Port and Dry Dock, Highland'. This measurement was conducted prior to any demolition on-site, but with the quarry in full operation. The Site Monitoring Plan in SHEQ09.4 10/10/21 describes the noise monitoring adequately on page 10. Noise monitoring will be conducted as per SHEQ79 Scheme of Noise Monitoring which details the sampling and set locations around the perimeter and out with the dry dock at certain sensitive receptors across the Loch. Appendix 2 shows sampling point locations. All equipment used is reportedly externally calibrated.	Compliance was confirmed during the inspection.
	Air	The Site Monitoring Plan in SHEQ09.4 10/10/21 describes the dust monitoring adequately on page 8. Dust sampling pads will be installed for 14 days prior to a project being undertaken, to provide an understanding of background dust levels. When potentially dusty activities are ongoing, the sampling	Compliance was confirmed during the inspection.

		pads will be changed and analysed every 14 days. The sample interval may be reduced if required, in the event that high emissions are suspected, or if complaints are received from the local community. The dust sampling pads will be sent back to the supplier's laboratory for analysis. Results will be compared to the background dust levels, and if the dust loading is higher than background, the direction of the dust loading will be considered to identify the source, so that appropriate improvements to dust management can be made. Dust will also be included on the Environmental Walk Round check list to allow prompt action to be taken. Complaints or incidents regarding dust will be investigated and recorded in the facility's non-conformance log. Where required water spray dust suppression will be utilised sparingly, to minimise solids entering the facility's drainage system.	
	Water	The facility conducted ground water monitoring in 2017 to establish groundwater quality. The facility contracted the third-party [redacted]. The results showed that the groundwater had good quality. The applicant will reportedly sample the surface drainage system in the start and end of each project. In addition, additional sampling may be taken if there were to be a loss of containment or similar event that could lead contaminated water entering the surface system. All trade effluent in the bunded work area is collected and pumped into storage tanks and transferred to an appropriate licensed waste receiver and sent for disposal. The surface water (rain water) from outside the bunded work area will be pumped into the settlement tank and through the interceptor, where under the General Binding Rule 28, under The Water Environment (Controlled Activities) (Scotland) Regulations 2011, it will be discharged. The applicant has forwarded engineering plan of settlement tank, interceptor and outfall.	Compliance was confirmed during the inspection.
	Soil	The facility has described that due to the design of the site and that the decommissioning / dismantling will be carried out on impermeable base of the dry dock, it is highly unlikely that any contaminates will be able to reach any unmade area of the site, however to confirm this, samples of soil will be taken	Compliance was confirmed during the inspection.

		from various points around the site during and after any project, under the guidance of [redacted] and sent to their Laboratory for analysis. The evaluators agree that it is unlikely that any contaminates will be able to reach soil as the operation is conducted in an impermeable floored dry-dock.	
	Sediment	The facility has described that due to the design of the site and that the decommissioning / dismantling will be carried out on impermeable base of the dry dock, it is highly unlikely that any contaminates will be able to reach the sediments. The facility has described that samples of sediment will be taken from the water channel base and from the settlement tank after any project under the guidance of [redacted] and sent to their Laboratory for analysis. The evaluators agree that it is unlikely that any contaminates will be able to reach sediments as the operation is conducted in a dry-dock. Should the operation on-site change, e.g., if any cutting will be performed above water, sediment sampling would then be expected.	Compliance was confirmed during the inspection.
Technical guidance note 2.1.4 (b),	Health	The contractors actively involved in recycling, [redacted], conduct regular medical monitoring of their employees. The facility also conducts health monitoring of its employees. Medical surveillance is performed annually, by a doctor, in accordance with health and safety at work regulations. Records are held in secure personnel files. An example was forwarded upon request and found in order.	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], an Accreditation Services for Certification Bodies (ASCB) accredited provider of management systems certification. Document control is conducted with the necessary revision and approval dates, management signatures and other formalities were found in order.	Compliance was confirmed during the inspection.

ILO SHG p21-23, p138:18.1, 18.3, p139:18.5	Workers facilities	The applicant has welfare facilities on-site. The welfare facilitates can accommodate up to 128 persons. The welfare facilities include toilets, showers and wardrobes and were found in good condition. The canteen serves three meals a day and was found in good order. Drinking water is available. In their HSE Policy document it is stated that “Smoking is strictly prohibited in the workplace.”	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. The SRFP, dated 24.01.2022, is found to cover the key chapters required, and that the description of the methods employed is clear and logical.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.1.1 (1)	Ownership	Kishorn Port Ltd is a joint venture company by Leiths (Scotland) Ltd. and Ferguson Transport.	The desk assessment showed compliance with this point.
MEPC 210(63) Section 3.1.1 (3), (4)	Facility organisation	An updated organisation chart was forwarded in ‘8. SHEQ27.4 KPL Organisational Chart’. The facility organization was found to represent the organisation at the time of the site inspection. The head of SHEQ is responsible on-site with different roles reporting to him, including the contractors for cutting operations.	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 SHEQ Policy Statement in the SRFP page 24. The policy is for the facility’s overall operations, and not ship recycling specific.	Compliance was confirmed during the inspection.

	Working hours and annual leave	According to a sample contract forwarded by the facility, core working hours are Mon-Fri 8am-6pm. Working hours must reportedly be registered on the time sheet to show the overtime and the workers are compensated according to the requirements of the Working Time Regulations 1991. The annual holidays for full time employees are 28 days. This includes Christmas Day, New Year's Day and all bank and public holidays. The facility will have an extensive use of contractors and sub-contractors on-site. Fair labour rights are vetted as part of the evaluation of sub-contractors (Decommissioning Contractor & Sub-Contractor Audit Stage 1).	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. Posters with basic information and daily instructions are displayed in the reception area of the Main Building. Safety Posters and reminders were found well displayed in appropriate work-locations. The instructions and procedures presented by the facility are of good quality.	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 SHEQ.	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 3.4.4.3/BC TG: p13: Table 1, p33: Table 5,	Intertidal zone Control of leakage Preventive actions	The applicant has stated that all recycling operations are performed in the dry-dock. The dry-dock floor is impermeable and is equipped with a fully encompassing drainage system. The facility demonstrated sound management of preventing adverse effects to health and environment.	Compliance was confirmed during the inspection.

p44: 4.1 / ILO SHG: p65: 7.2.4.4			
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	The dry-dock was flooded at the time of the inspection, and thus the condition of the surface could not be sighted during the inspection. Based on information and photos received it is seen that primary and secondary cutting is performed in the dry-dock only. Steel work is said to be lowered down to the dock floor for cutting into smaller sections mainly by shear. The small sections are lifted onto trucks in the dry-dock. For the first dismantling project, the facility loaded steel directly onto a ship by the dock gates.	Compliance was confirmed during the inspection.
Technical guidance note 2.2.2, MEPC210(63) Section p34: 3.4.4.1	Drainage	The dry-dock was flooded at the time of the inspection, however the drainage system for the dry-dock is well described in the SRFP. The applicant has forwarded additional information of the drainage system in 'Engineering Plan Site Drainage', 'Photos to support Document Dry Dock Base and Surface Water Drainage' and 'The Dry dock base and surface water drainage information' which appears to be adequate.	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 describes extensive use of sub-contractors for removal of waste, such as [redacted] This company will remove the waste and transport it to the waste management facility. If storage on-site is required temporarily, e.g. in the event of large quantities, it is understood that storage in adequate containers will be provided by e.g., [redacted]	Compliance was confirmed during the inspection.

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 Commission 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 for reselling was described by the facility.	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 companies' Waste Management Licenses 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, p63/64/65/66/67, p70, p81, p83, p87, p89/ ILO SHG p32: 4.6, p 49: 7.1.8, p 128:16.	Emergency preparedness and response plan	The SRF's Emergency Preparedness and Response plan (EPRP) is referenced in the SRFP as a separate document (SHEQ07).The referenced document SHEQ07.3 "Kishorn Port Incident Plan" contains details of the roles and responsibilities in case of an incident. Further, document SHEQ04.2 "Safety, Health & Environmental Guidelines for Tenants & Facility Users" outlines key areas for consideration by other companies utilising the facility, as well as the minimum SHE expectations of the facility. . It was explained to the evaluators that the primary sub-contractor will create their own SHE Plan for each recycling project, with consideration of the facility's SHE requirements. This plan will then be evaluated together with KPL, and a "SHE Bridging Plan" will be created as found necessary. The	Compliance was confirmed during the inspection.

		intention of this approach is to allow the sub-contractor's workers to follow their own company's management system, whilst ensuring that the facility's requirements are also adequately covered. A SHE Plan from a tenant utilising the facility was sighted during the site inspection. Whilst this document was not pertaining to a ship recycling project, the typical scope and level of detail presented could be evaluated, and was found to reflect the current layout of the facility and to be adequate. A "Generic Site Operational Plan" was also provided during the inspection, identifying the locations of pollution control equipment, fire fighting points and muster points. The applicant is advised to also include the locations of first-aid equipment and evacuation routes.	
Technical guidance not 2.2.4, MEPC 210(63) Section 3.2.1	Emergency access routes	The dry-dock has an access road that can be used by emergency vehicles. The facility described that escape from a dry-docked vessel is assured by two access points. 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 at the time of inspection.	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	Medical assistance is available in Lochcarron, approximately 10km away. More advanced hospitals are located in Inverness approximately 100km away. Medical helicopters are available in the event of emergency. The site can accommodate landing of helicopters in several locations close to the dry-dock.	Compliance was confirmed during the inspection.
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. Much of the UK's health and safety law has originated in Europe – and is considered on this basis to be broadly equivalent to EU requirements. 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".	Compliance was confirmed during the inspection.

		The UK Health and Safety Executive (HSE) is the national regulator. The Scottish Environmental Protection Agency (SEPA) is the competent authority in Scotland.	
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	During recycling operations it is said to be the principal contractor that is responsible for day-to-day safety of the recycling operations. The number of safety inspectors and their specific roles would be determined on a project by project basis. The facility is responsible for vetting the principal contractor and their project execution documentation, including safety inspection plans, to ensure these meet the relevant requirements. This process is led by the facility's "Head of SHEQ"", who also performs daily safety and compliance inspections.	Compliance was confirmed during the inspection.
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 subject to an induction presentation.	Compliance was confirmed during inspection.
Technical guidance note 2.3.3, MEPC 210(63) Section 3.1.2/3.2.2	Safety induction, visitors	All visitors are subject to an induction presentation. (The evaluators attended induction training shortly after arrival.)	Compliance was confirmed during the inspection.
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.	Compliance was confirmed during the site inspection.

		The facility has a document SHEQ05 “Management of Risk Plan” which details their approach to risk management. Generic risk assessments are maintained in the quality system, and risk assessment method statements (RAMS) are to be prepared prior to any task being undertaken. All sub-contractors / third parties are required to submit their RAMS in advance of the start of any project. Risk assessments included in the facility’s lifting operations plan and [redacted] Active Waste Management Plan for the vessel [redacted] were sighted.	
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 facility has forwarded SEPA licenses for the companies that can be contracted for hazardous waste removal. The facility explained how they check that the sub-contractors hold the required qualifications and are adequately trained, this process is presented in the facility’s document SHEQ 100 Decommissioning Contractor & Sub-Contractor Approval Process.	Compliance was confirmed during the site inspection.
MEPC 210(63) Section 3.3.5	Ship access control	The facility advised that they determine the ship access control requirement on a project specific basis. It was seen during the inspection that the vessel currently in lay-up in the dry-dock utilised a T-card system.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.5	Prevention of falling from heights	Prevention of falling from heights is covered in the SRFP, with reference to a separate Working at Height policy document. It is stated that all tasks that require working at height shall be risk assessed and requires a working at height permit-to-work. It is a requirement through the Decommissioning Contractor and Sub-Contractor Approval Process (SHEQ 100) that all contractors and sub-contractors will as a minimum follow the facility’s working at height procedures. It should be noted that the facility utilises the services of specialists in the fields of scaffolding and rope-access in connection with operations that require working at height.	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). Safety signs, safety posters and warning labels were sighted and found satisfactory.	Compliance was confirmed during the inspection.

MEPC 210(63) Section 3.3.4.1.8	Safety signage on vessel	There was no vessel being recycled at the time of the inspection. The facility has explained however the type of safety signage that would be used, this was confirmed through explanations provided by sub-contractors present during the inspection.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.6	Lifting equipment and instructions	All lifting operations at the facility are governed by the UK HSE Lifting Operations and Lifting Equipment Regulations 1998 (LOLER). These regulations place duties on persons and organisations who own, operate or have control of lifting equipment. The facility demonstrated their management of lifting operations by presenting a "Lifting Operations Planning Form" for a lifting operation involving their 100te mobile crane lifting a load from the dockside to a vessel currently occupying the dry-dock. This document was found to be comprehensive, covering elements such as persons involved, roles & responsibilities, tool-box talk, details of the lift, lifting equipment and certificates, weather conditions, PPE, method, rigging statement, risk assessment, details of the crane and operator. The facility's rigging store was inspected and found to be orderly with equipment marked for safe working load and colour coding to indicate equipment approved for use. The facility documented that the lifting equipment is subject to periodic inspection on a 6-months cycle. The records provided relevant details including description, identification, examiner, examination date, next examination date and certificates.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.6	Crane operators' certification	Crane operators' certification was presented during the site inspection. The cranes and operators from approved suppliers are also used at the facility. The qualifications of the operators is assessed as part of the approval process (ref. SHEQ100.1).	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.1.2	Training of forklift operator	Forklift operators' certification was presented during the site inspection.	Compliance was confirmed during the inspection.

MEPC 210(63) Section 3.1.2	Certification/ training of cutters	Certification for oxy propane cutting techniques for 3 employees, and certification for mechanical shear cutting for 1 employee, of [redacted] were made available.	Compliance was confirmed during the inspection.
MEPC 210(63) 3.4.3	Cutting procedures	The contractors and sub-contractors performing the recycling operations will prepare the cutting methodology. A sample method from [redacted] is presented in the active waste management plan for the vessel [redacted] recycled at the facility in 2021. This method is built upon the standard operating procedures (SOPs) of the contractor. [redacted] have also made available a sample of their SOPs including “Oxygen/propane gas cutting”. The method and adherence to SOPs is said to be the responsibility of the contractors project manager on site. Tool-box talks and other meetings will be used to convey the details to those executing the work.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.3 / ILO SHG: p108ff:13.	Steel cutting machines	Mechanical shears were the primary cutting method on the vessel [redacted] recycled at the facility in 2021, this has been evidenced through photos and videos of the operations and confirmed during the inspection. No cutting operations were though seen during the inspection.	Compliance was confirmed during the inspection.
ILO SHG: p108ff:13.	Other machinery	A visual examination of selected machinery across the site was concluded without findings.	Compliance was confirmed during the inspection.
ILO SHG: p67:7.2.4.4, p108ff:13.	Winches, mooring gear	Vessels to be recycled are said to be manoeuvred into the dry-dock and set down (by way of pumping out the water from the dry-dock) either directly onto the impermeable floor or onto supporting blocks to ensure stability. As such contracted tugs provide the manoeuvring force rather than winches. There does exist numerous mooring points around the edge of the dry dock which may be utilised in addition. These were observed, to the extent possible, to be in good order.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.6.	Ropes/chains/ slings	Visual spot checks of loose gear for lifting equipment was concluded without findings, observations and/or remarks. Periodical examinations are carried out by independent licensed organisations. The system for traceability of equipment in use was found to be in order. Any faulty equipment is said to be removed from site, a dedicated quarantine area was sighted for such equipment. A few items to	Compliance was confirmed during the inspection.

		be quarantined were found in the storage area. These were immediately removed by the facility and quarantined.	
MEPC 210(63) Section 3.3.4.8	Maintenance and decontamination of tools and equipment	The facility explained that all equipment is inspected for defects prior to use, and if so found will be taken out of use. Machinery is inspected daily by the operator and results recorded.	Compliance was confirmed during the inspection.
ILO SHG 16.1.6	Eyewash	Eyewash (full bottles, in date) was found to be available at several locations around the facility, primarily in the vicinity of the main office building and at the storage container near the dry-dock. The number and location of eyewash kits is said to be established on a project-by-project basis.	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.	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 around the office buildings. Lighting of other areas is on a project-by-project basis, with lighting established as deemed necessary.	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 is stated in the facility's Port Incident Plan (SHEQ7.3) that the public fire brigade can be at the facility within 15-20mins. The facility advised that they have held familiarisation exercises with the fire brigade, who are also invited to the facility in advance of projects to discuss and agree on emergency preparedness and response.	Compliance was confirmed during the inspection.
ILO SHG: p49: 7.1.7	Fire instructions and signage	Basic firefighting instructions and warning signage were seen to be in place. The permit to work process for hot work also includes relevant precautionary information with regards fire.	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. The facility explained that they cooperate with the local fire brigade. The facility will call in the local fire brigade for a briefing and discussion at the start of a new project.	Compliance was confirmed during the inspection.

MEPC 210(63) Section 3.3.6, ILO SHG: 8.8.11	Fire alarm system on shore	Air horns sighted at several locations around the site.	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.	Compliance was confirmed during the inspection.
Technical guidance note 2.3.3, MEPC 210(63) Section 3.3.6, ILO SHG: 8.8	Fire prevention measures general	In addition to the permanent fire prevention measures at the facility, a project fire risk assessment is said to be prepared prior to commencement of operations. Part of the risk assessment is to evaluate the need for temporary fire-fighting equipment.	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 would be removed before cutting.	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	No recycling work was going on at the time of the site-inspection and no AC/OX were present. Due to the stringent health and safety laws in the UK it is expected that the condition of such equipment is sufficiently maintained.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.4	Transporting/ storing flammable gases	No recycling work was going on at the time of the site-inspection and no transporting/ storing flammable gases was observed. Due to the stringent health and safety laws in the UK it is expected that transporting/ storing flammable gases is sufficiently maintained.	Compliance was confirmed during the inspection.
MEPC 210(63): p21: 3.3.5, p23: 3.3.6	Fire hydrants	The facility advised that they possess a 19.000 litre trailered water tank and pump. This is said to be deployed to locations considered to be high risk. Photographs of this unit in place beside the vessel Kaami have been provided.	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	The HSE Policy document states that “Smoking is strictly prohibited in the workplace.” No smoking was observed on-site.	Compliance was confirmed during the inspection.
ILO SHG 8.4.2	Entrances / gates, fencing	The facility is located within the Kishorn Port area. Kishorn Port maintain access control to the harbour area – this is a gated entrance with manning. The dry-dock itself is fenced and access road to the dry-dock will reportedly be guarded during recycling projects.	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 is checking that the sub-contractors hold the required qualifications and are trained in their Decommissioning Contractor & Sub-Contractor Audit Stage 1 and 2.	Compliance was confirmed during the inspection.
Technical guidance note 2.3.2, MEPC 210(63) Section 3.3.4.10	PPE	Although no recycling was ongoing at the time of the inspection it could be observed during the site tour that the use of PPE was well implemented, freely and readily available as needed. No person without PPE are allowed to enter production areas. Automatic inflatable life jackets are required for any work on the dock gates.	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 are documented and form part of the Decommissioning Contractor & Sub-Contractor Audit Stage 1 and 2. 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. A redacted example record for a [redacted] employee was forwarded for review.	Compliance was confirmed during the inspection.

	Incident monitoring and reporting	All spills are said to be investigated and recorded under the facility's non-conformance procedures. Co-ordination of incident reporting and subsequent root cause analysis is said to be the responsibility of the "Head of SHEQ". This person is also the SEPA liaison, and in the event of a significant spillage would inform SEPA immediately. In any case the facility is required to report all activity to SEPA on a quarterly basis. The facility provided the document HS28 Accident and Incident Reporting and Investigation procedures to support the information received during the inspection.	Compliance was confirmed during the inspection.
	Statistics	The "Head of SHEQ" explained how monthly policy objective monitoring and reporting is performed. The facility provided the document 'SHEQ66 KPL Accident and Incident Statistics 2019-2021' to support the information received during the inspection with regards to recorded number of near misses, lost time events and major accidents. KPL experienced one slips, trips and fall accident in 2020 and the cook caught her foot in a container door due to wind causing the door to close unexpectedly in 2021. These incidents did not result in any time off work.	Compliance was confirmed during the inspection.
	Near-miss reporting	All workers are said to be responsible for reporting all accidents, incidents and near misses. A Safety Action Card system is utilised to obtain input from the workforce. The facility has after the inspection forwarded supporting documents in HS128 Health and Safety Action Card Procedures, QD04 Non-conformance Report 163 and e-mail confirmation to close out NC 163. Additionally, the applicant forwarded photos of safety action card locations.	Compliance was confirmed during the inspection.
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 has forwarded 'C 10 SHEQ88 1 Ship Recycling Plan Template'. This template is found to be good and developed in accordance with the requirements of Article 7.2 of the EU SRR, including information of the type and amount of hazardous materials and waste to be generated (including location on the vessel) and safe for entry and safe for hot works.	Compliance was confirmed during the site inspection.

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;			
Commission Implementing Decision (EU) 2016/2324	Report of planned start of ship recycling	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). According to the signed statement, the facility will prior to any recycling of the ship — send the ship recycling plan, approved by the competent authority according to the procedure applicable, to the ship owner and the administration or a recognised organisation authorised by it; — report to the administration that the ship recycling facility is ready in every respect to start the recycling of the ship (Please see the format of the report of planned start of ship recycling as set out in Commission Implementing Decision (EU) 2016/2324). The facility has included a procedure for the report of planned start of ship recycling according to the EU Commission Implementing Decision on page 16 of its '2,.SHEQ84 2 Vessel Acceptance Gate Review process'. The evaluators are of the impression that the ship recycling facility can adapt to these new legal regimes.	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.			
Commission Implementing Decision (EU) 2016/2322	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). According to the signed statement, the facility will: "(*b) 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 will include a report on incidents and accidents damaging human health and/or the environment, if any*." The Statements of Completion for EU Member States flag ships provided by the facility shall be prepared in the required format set out in Commission Implementing Decision (EU) 2016/2322.	Compliance was confirmed during desk assessment.

		The facility has included a procedure for the statement of completion according to the EU Commission Implementing Decision on page 18 of its '2,.SHEQ84 2 Vessel Acceptance Gate Review process'. The evaluators are of the impression that the ship recycling facility can adapt to these new legal regimes.	
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/1175043, issued 29.03.2019.	Compliance was confirmed during desk assessment.
MEPC 210(63) p8: 3.1.2, p10: 3.2.2 / BC TG: p38: 3.4.3	Sub-contractors	The applicant describes extensive use of subcontractors. The applicant has listed the following companies which will be directly involved in dismantling operations: • [redacted] • [redacted] The applicant has provided environmental permits and registrations for a number or waste handling companies performing carriage of waste. The permits and registration are with the Scottish Environmental Protection Agency (SEPA): [redacted]	Compliance was confirmed during desk assessment.

		[redacted]	
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 UK List of Ship Recycling Facilities indicates 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 previously, 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 advised that it is their intention that all SRPs will be approved explicitly in future.	Compliance was confirmed during 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 by dry-docking of the vessel to be recycled.	Compliance confirmed during the inspection.
	Type and size of ships that can be recycled	All types of ships. The facility can accept ships with the following maximum ship dimensions: - Width: 100 metres - Length: 140 metres	Compliance confirmed during the inspection.

		- Draught: 12 meters	
	Any limitation and conditions	The facility can accept all types of ships with a length limitation of 140m and with limitation of 100m.	Compliance was confirmed during the inspection.
	Maximum annual ship recycling output	The applicant has to date only recycled the 1,200 LDT [redacted] From the licence provided by SEPA the maximum total tonnage of any ship or ships to be recycled in any one year is limited to 40,165.	Compliance was confirmed during the inspection.
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 its contractors and the evaluators find that the facility has a well implemented system.	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 its contractors and the evaluators find that the facility has a well implemented system.	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 in Appendix 5. The applicant has later supplemented more details of the dry-dock.	Compliance was confirmed during 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	Only fully licensed contractors will be used for handling and disposal of hazardous materials. SEPA license for various contractors have been forwarded by the facility.	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 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	Prior to any project the vessel inventory of Hazardous materials will be studied to identify any hazardous materials within the vessel. Based on this, fully licensed and experienced contractors will be identified. The use of licensed contractors will vary from project to project but would include a specialist cleaning company. One of the companies the facility may work with is Denholm MacNamee LTD. The Head of SHEQ at KPL holds a WAMITAB certificate of technical competence (CoTC) for the transfer of hazardous waste and the holder of Radiation Protection Supervisor competence certificate and will oversee the contractors to ensure full compliance with the sites permits and licences.	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	The SRFP section 4.3.1 describes how the facility will remove asbestos and materials containing asbestos. Reportedly, only fully licensed contractors will be used for handling and disposal of asbestos. The Asbestos Licensing Unit (ALU) operates a permission regime that issues licences to carry out licensable work with asbestos as defined in regulation 2 of The Control of Asbestos Regulations 2012. Any storage on site will be in closed and bunded areas in full compliance with all regulations and in full compliance with the Site Waste Management Licence. The facility has clarified that the use of licensed contractors will vary from project to project.	Compliance was confirmed during the site inspection.
MEPC210(63) Section 3.4.3.2	Management of polychlorinated biphenyl (PCBs)	The SRFP section 4.3.2 describes how PCBs and materials containing PCBs will be managed. Only fully licensed and experienced contractors will be used for handling and disposal of PCBs. Any storage on site will be in closed and bunded areas in full compliance with all regulations and in full compliance with the Site Waste Management Licence The facility has clarified that the use of licensed contractors will vary from project to project.	Compliance was confirmed during the site inspection.
MEPC210(63) Section 3.4.3.3	Management of Ozone-depleting substances (ODS)	The SRFP section 4.3.3 describes how ODS will be managed. Reportedly, all ozone depleting substances and related products will be handled and removed by a fully licensed contractor/waste remover to prevent any damage or release, any storage on site will be in closed and locked skips. All ozone depleting substances and WEE containing ozone depleting substances will be transported by a licensed waste carrier and disposed of at a fully licensed waste receiver where the ozone depleting substance will be treated accordingly.	Compliance was confirmed during the site inspection.

		The facility has clarified that the use of licensed contractors will vary from project to project.	
MEPC210(63) Section 3.4.3.4	Management of paints and coating including anti-fouling with organotin TBT	The SRFP section 4.3.4 describes how paints and coatings will be managed. Prior to any cutting, samples of paint will be taken and tested for any lead or other hazardous content. The results from these tests will dictate how the cutting processes are conducted. A full fire plan will be prepared specific to the vessel taking into account all flammable substances and surface coverings. Initial downsizing will be completed using a mix of mechanical methods and hot cutting depending on the material being cut. Where possible, hot cutting will be kept to a minimum. The facility has clarified that the use of contractors will vary from project to project.	Compliance was confirmed during the site inspection.
MEPC210(63) Section 3.4.3.5	Procedures for operationally generated wastes	The SRFP section 4.3.5 describes how operationally generated waste will be managed. Only fully licensed contractors will be used for handling and disposal of hazardous waste. Fully licensed and experienced hazardous waste remover will be utilised to remove any hazardous liquids or sediments, these will be transported by fully licensed waste carriers to licensed waste receiver. Any storage on site will be in closed and bunded areas in full compliance with all regulations and in full compliance with the Site Waste Management Licence. The facility has clarified that the use of licensed contractors will vary from project to project.	Compliance was confirmed during the site inspection.
	Management of perfluorooctane sulfonic acid (PFOS)	PFOS will only be removed by fully licensed and experienced contractors. Any storage on site will be in closed and bunded areas in full compliance with all regulations and in full compliance with the Site Waste Management Licence. The facility has clarified that the use of licensed contractors will vary from project to project.	Compliance was confirmed during the site inspection.
MEPC210(63) Section 3.4.3.6	Management of heavy metals (lead, mercury, cadmium and hexavalent chromium)	The SRFP section 4.3.6 describes the management of heavy metals (lead, mercury, cadmium and hexavalent chromium). All heavy metals substances and related products will be handled and removed where necessary by a fully licensed contractor. Any storage on site will be in closed and locked skips in full compliance with all regulations and with the Site Waste Management Licence. Waste electrical equipment that contains heavy metal substances will be transported by a licensed waste carrier and disposed of at a fully licensed waste receiver where heavy metals will be removed and treated accordingly.	Compliance was confirmed during the site inspection.

		Any equipment and fittings that contain mercury will be transported in their entirety to a waste receiver who specialises in the removal of mercury. The facility has clarified that the use of licensed contractors will vary from project to project.	
MEPC210(63) Section 3.4.3.7	Other hazardous materials in Annex II	The SRFP section 4.3.7 describes how other hazardous waste will be managed. The site has a SEPA approved NORM Permit for the handling, storage and forward transport of NORM contaminated items, a fully licensed, experienced and competent Hazardous waste remover will be utilised to remove the NORM or radioactive substance. Radioactive waste will be handled by [redacted] License from SEPA has been forwarded by the facility. The facility has clarified that the use of licensed contractors will vary from project to project.	Compliance was confirmed during the site inspection.
MEPC210(63) Section 3.4.2.2	Additional sampling and analysis	Only fully licensed contractors will be used for sampling hazardous waste. The applicant explained a thorough evaluation of the IHM and how they will select a laboratory with all relevant analysis in their scope of accreditation. The facility will charge the vessel owner additionally if more hazardous materials are found onboard compared to the information provided in the IHM. The facility has at such an incentive to find additional hazardous materials.	Compliance was confirmed during the site inspection.
MEPC210(63) Section 3.4.2.3	Identification, marking and labelling	Identification, marking and labelling and potential on-board locations is described in section 4.2.2 in the SRFP. It was described during the inspection by the licenced contractors that they will mark and label hazardous materials onboard the vessel to be dismantled.	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. All waste is said to be transported by licensed contractors. [redacted] have been presented and licenses from SEPA forwarded.	Compliance was confirmed during the site inspection.

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. The facility also explained and provided thorough documentation to demonstrate how they evaluate their sub-contractors. 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. In the context of a previous site inspection of another 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. According to the information provided, the facility will use the following waste management companies:	Compliance was confirmed during the inspection.

		[redacted]	

It is understood that [redacted] will not dispose waste directly themselves but transport it to the Tradebee Fawley Incinerator based in Hampshire, the Avondale waste treatment facility or to Taylors Environmental Services.

Tradebee Fawley Incinerator is one of UK's largest facilities for the final disposal of hazardous waste. Tradebee Fawley operates a rotary kiln incinerator. It is reportedly classified as an upper tier COMAH (Control of Major Accident Hazards) site, processing difficult chemical and industrial waste streams not suitable for alternative treatment or disposal options.

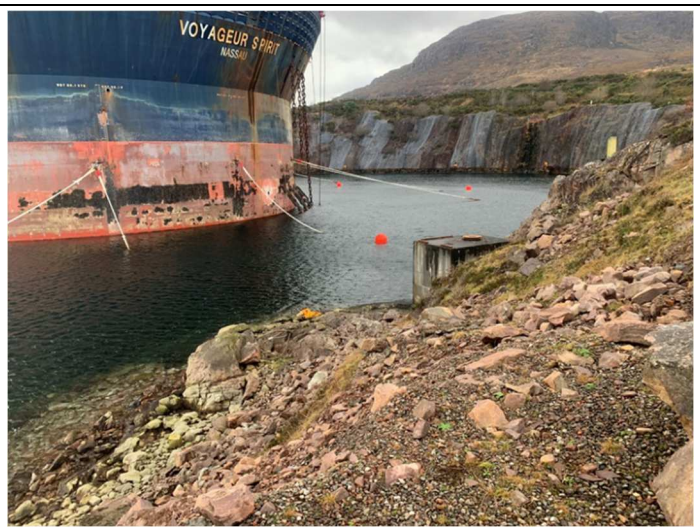
Avondale Environmental Ltd is a leading waste treatment facility, with operations in non-hazardous and hazardous landfill, material recycling and RDF production, soil treatment and landfill gas-to-energy generation. Avondale has been processing waste since 2000. Asbestos will be landfilled at Avondale landfill.

Taylors Industrial Services will process and recycle oils and oily water. This company also offers tank cleaning services and bulk liquid transfers.

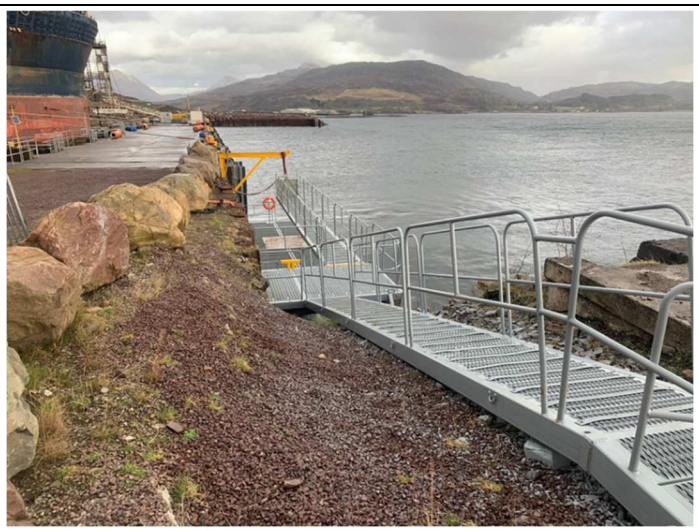
		Based on all the available information, it is expected that the waste management facilities utilized will be operated in accordance with human health and environmental protection standards that are broadly equivalent to relevant international and EU standards.	

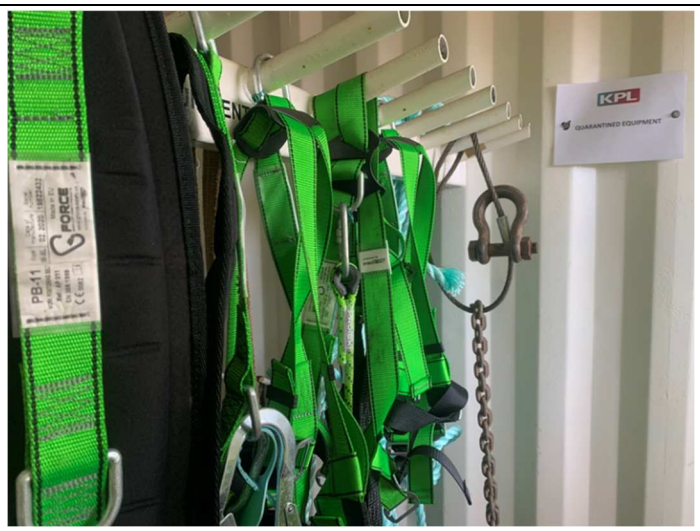
7 PHOTOS FROM INSPECTION

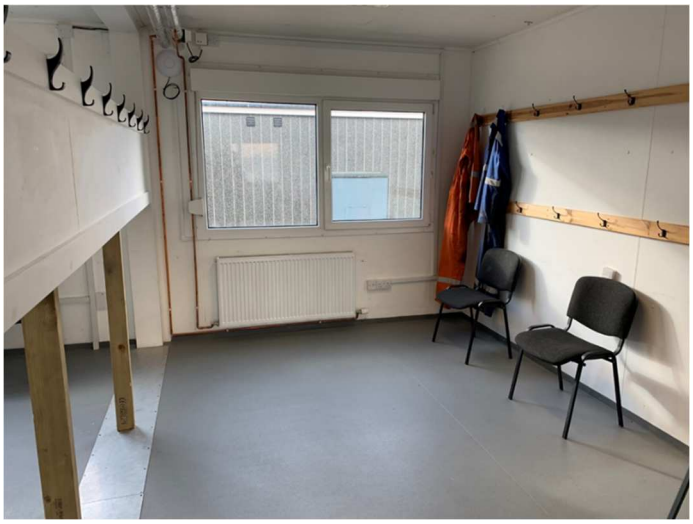
#	Photo	Description
1		Dock gates, and flooded drydock with temporarily moored FPSO.
2		Flooded drydock with temporarily moored FPSO.
3		Dry-dock gates, from inside the dry-dock

4		Dry-dock view
5		Dry-dock view
6		General view of Storage Unit and transportation area.

7		Manhole cover to sump drain water oil separator system.
8		View of access road to dry-dock.
9		View of access gate to dry-dock.

10		Gangway to sea-level on outside of dry-dock gates.
11		Oil pollution emergency response container.
12		Slings and shackles storage

13		Working at height safety harnesses. Quarantine area for faulty equipment in background.
14		From left; Facility's fast rescue boat, dumper truck and crew transfer vessel.
15		Facility's 100te mobile crane and loader.

16		Entrance to main office building. Safety posters and emergency contacts and procedures on the walls.
17		Induction, training room and first-aid room.
18		Cloak room for persons utilising the welfare facilities.

19		Typical room in welfare accommodation units
20		Typical room in welfare accommodation units

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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.

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