

Commonwealth of Dominica**Office of the Maritime Administrator**

- TO:** ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF MERCHANT SHIPS, MOBILE OFFSHORE DRILLING UNITS AND RECOGNIZED ORGANIZATIONS
- SUBJECT:** Use of Halogenated Hydrocarbons (Halons) and other Ozone Depleting Substances
- REFERENCE:** MARPOL 73/78 Annex VI
- PURPOSE:** This Circular is intended to draw attention to the restrictions regarding the use of ozone depleting substances including the phasing out of the production and consumption of Halon 1211, 1301 and 2402 by 1 January 2000 and the affect this is having on the available supply of Halons still being used as a fire extinguishing media.
- APPLICABILITY:** The Safety of Life at Sea Convention, 1974, as amended, Regulation II-2/5 permits the use of Halogenated Hydrocarbons (Halons) as a fire extinguishing media on vessels, including all Mobile Offshore Drilling Units, built before 1 October 1994 and IMO Assembly Resolution A.719 (17) permits the use CFCs in fixed refrigeration and air conditioning systems on vessels built before 6 November 1992. This Circular is directed to those vessels still so equipped.

DESCRIPTION:**1.0 1987 Montreal Protocol**

- 1.1 The United Nations' Environment Program through its Montreal Protocol on Substances that Deplete the Ozone Layer, 1987, which entered into force in January 1989; stipulates that owing to the ozone-depleting potential of chlorofluorocarbons and Halons, the production and consumption of chlorofluorocarbons and Halon, including CFC-11, CFC 12, CFC-113, CFC-114, CFC-115, Halon-1211, 1301 and 2402 should be kept at their 1986 levels and phased out by 1 January 2000.

- 1.2 Accordingly, the International Maritime Organization in support of this initiative has recommended and encouraged all sectors of the maritime industry to limit the use of Halons and CFCs aboard ships, and would amend of SOLAS 1974 by MSC Resolution 27(61) urging the use of alternative fire extinguishing systems and media on new buildings after 1 October 1994, urging the prohibition of any new installations on existing vessels and the release of Halons into the atmosphere when testing existing systems. IMO Assembly Resolution A.719 (17) would prohibit the use of CFCs in any new installation on ships after 6 November 1992.

2.0 System Replacement

The Administration has not established a phase out date for existing Halon installations and systems using CFCs on ships registered under the Dominica International Registry. It is the Administration's interpretation of the IMO rules regarding the use of Halon and systems containing CFCs that only new installations are to be prohibited. Existing systems may be continued in use as long as the systems remain serviceable.

3.0 Emissions

Under the terms of Regulation 3 of MARPOL Annex VI, any deliberate emissions of ozone depleting substances are prohibited. Deliberate emissions are defined as emissions occurring in the course of maintaining, servicing, repairing, or disposing of systems or equipment but do not include minimal releases associated with the recapture or recycling of an ozone depleting substance. The Commonwealth of Dominica has not ratified Annex VI to MARPOL, but ship owners and operators should abide by the spirit and intent of the Annex to the extent practicable.

4.0 Replenishment Source

- 4.1.1 The 1985 Vienna Convention and the 1987 Montreal Protocol provide for the establishment of Halon Banks by member States to make recycled Halon commercially available for shipboard fire fighting equipment. However, some port States that are parties to the Convention and Protocol will not allow their Halon Banks to supply Halons to ships in the registry of other countries that are not party to the Montreal Protocol. For information, the Commonwealth of Dominica is not a party to the Convention and Protocol.

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