



**REPUBLIC OF
THE MARSHALL ISLANDS**
MARITIME ADMINISTRATOR

Marine Notice

No. 2-011-11

Rev. Jan/2018

TO: ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF MERCHANT SHIPS, AND RECOGNIZED ORGANIZATIONS

SUBJECT: Systems Using Halogenated Hydrocarbons (Halons) and Other Ozone Depleting Substances

- References:**
- (a) **SOLAS**, *the International Convention for the Safety of Life at Sea*, Chapter II-2 Regulation 10
 - (b) **MARPOL**, *the International Convention for the Prevention of Pollution from Ships*, Annex VI
 - (c) **IMO Assembly Resolution [A.719\(17\)](#)**, *Prevention of Air Pollution from Ships*, adopted 06 November 1991
 - (d) **IMO Circular [FP.1/Circ.46](#)**, *Halon Banking and Reception Facilities*, issued 25 January 2013
 - (e) **RMI Marine Notice [2-011-14](#)**, *Maintenance and Inspection of Fire-Protection Systems and Appliances*
 - (f) **European Regulation (CE) No. 2037/2000**

PURPOSE

This Marine Notice draws 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 that began on 01 January 2000 and the effects this is having on the available supply of Halons still being used as a fire extinguishing media. This Notice supersedes Rev. 2/12 and reflects the removal of Appendix 1 of this Notice following the updating of IMO Circular FP.1/Circ.46 and provides a hyperlink.

APPLICABILITY

The International Convention for the Safety of Life at Sea (SOLAS) Regulation II-2/10, still permits the use of Halogenated Hydrocarbons (Halons) as a fire extinguishing media on vessels built before 01 October 1994. IMO Assembly Resolution A.719(17) permits the use of chlorofluorocarbons (CFCs) in fixed refrigeration and air conditioning systems on vessels built before 06 November 1992. This Notice is for those vessels still equipped with this equipment.

1 of 4

Inquiries concerning the subject of this Notice should be directed to the Republic of the Marshall Islands Maritime Administrator, c/o Marshall Islands Maritime and Corporate Administrators, Inc., 11495 Commerce Park Drive, Reston, VA 20191-1506 USA. The most current version of all Republic of the Marshall Islands Marine Notices may be found at www.register-iri.com.

MI-01, Rev. Apr/2016

BACKGROUND

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 CFCs and Halons, the production and consumption of CFCs 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 01 January 2000.
- 1.2 Accordingly, the International Maritime Organization (IMO), in support of this initiative, recommended and encouraged all sectors of the maritime industry to limit the use of Halons and CFCs aboard ships, and by amendment of SOLAS 1974 via IMO Resolution [MSC.27\(61\)](#) to use alternative fire extinguishing systems and media on new buildings after 01 October 1994, prohibit any new installations on existing vessels and prohibit the release of Halons into the atmosphere when testing existing systems. IMO Assembly Resolution [A.719\(17\)](#) prohibited the use of CFCs in any new installation on ships after 6 November 1992.
- 1.3 In addition, in accordance with Article 11.1 of the European Regulation (CE) No. 2037/2000, exports from the Community of Halons (1301, 1211 or 2402) or products and equipment containing those substances or whose continuing function relies on supply of those substances are prohibited since 31 December 2003.

2.0 System Replacement

- 2.1 The Republic of the Marshall Islands (RMI) Maritime Administrator (the "Administrator") has not established a phase out date for existing Halon installations and systems using CFCs on RMI registered ships. It is the Administrator's interpretation of the IMO rules regarding the use of Halon and systems containing CFCs that only new installations are prohibited. Existing systems may be continued in use where they are considered fit for their intended purpose and as long as the systems remain serviceable.
- 2.2 The European Commission (EC) considers that the supplying of a non-European Union (EU) flagged ship in an EU-port with Halon is an illegal export. Therefore, please be aware that in case Halon replenishment is needed, refilling of such systems with other than the original Halon put ashore and returned for survey purposes on non-EU flagged ships will not be possible and the vessel will be detained until a new fixed firefighting system is installed on board. Based on this, vessels calling regularly at EU ports are advised to replace the system as soon as practicable.

3.0 System Inspection and Testing

- 3.1 Halon systems are to be maintained following the guidelines in RMI Marine Notice [2-011-14](#), *Maintenance and Inspection of Fire-Protection Systems and Appliances*.

- 3.2 Due to the phasing out of the production and consumption of Halon 1211, 1301 and 2402 that began on 01 January 2000, there has been increasing difficulty locating servicing facilities and suppliers for the testing and maintenance of existing fixed Halon fire suppression systems and components. Based on the logistical difficulties associated with this situation, the Administrator will consider an alternative maintenance schedule for the hydrostatic testing of Halon storage cylinders. See IMO Circular [FP.1/Circ.46](#), *Halon Banking and Reception Facilities*.
- 3.3 Under the alternative maintenance schedule, the hydrostatic testing interval of 20 years for Halon storage cylinders may be extended by five (5) years provided the following conditions are met:
- .1 A cylinder has not been discharged during its service history;
 - .2 Cylinder contents are verified by weighing or isotropic measurement;
 - .3 Cylinder pressure/levels are verified to be acceptable;
 - .4 A thorough visual inspection of cylinders reveals no defects; and
 - .5 Cylinders are gauged to the extent considered necessary, and the wall thickness readings kept on board for future comparative reference.
- 3.4 Additionally, a thorough examination must be made of all accessible component parts of the Halon system, including control valves and connections, to verify satisfactory condition and freedom from leakage. Selected control valves must be opened out for internal examination to the extent necessary.
- 3.5 Any cylinders that do not meet the provisions stated above must be tested, or taken out of service.
- 3.6 The cylinder inspection and thickness gauging must be repeated annually as part of the annual servicing of the system, until the end of the five (5) year extension period.
- 3.7 Consideration for the application of the alternative hydrostatic testing requirements for the fixed Halon system storage cylinders will be given on a case-by-case basis, and must be approved in writing by the Administrator.

4.0 Emissions

Subject to the provisions of Regulation 3 of MARPOL Annex VI, any deliberate emissions of ozone depleting substances must be prohibited. Deliberate emissions include those occurring from maintaining, servicing, repairing, or disposing of systems or equipment. Deliberate emissions do not include minimal releases associated with the recapture or recycling of an ozone depleting substance. The Administrator should be notified immediately by any shipowner or operator of emissions arising from leaks of an ozone depleting substance whether or not the leaks were intentional.

5.0 Replenishment Sources

- 5.1 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 firefighting equipment. However, some port States that are parties to the Convention and Protocol will not allow the Halon in their banks to resupply ships in the registry of other countries that are not party to the Montreal Protocol. Please also note the EC's position in §2.2 above.
- 5.2 RMI is a party to the Convention and Protocol. Therefore, the Administrator should be notified immediately if any shipowner or operator experiences difficulties obtaining replenishment Halon supplies.