

Lissie Klingenberg Jørgensen

Fra: Emilien.GASC@ec.europa.eu
Sendt: 22. marts 2017 10:35
Til: Lissie Klingenberg Jørgensen
Emne: RE: Can the hull of a ship be stored outside an impermeable area during the dismantling of the ship

Dear Lissie,

No objection, but the following limitations:

- It should be clarified that I did not receive a reply from you to my request that you clarify your question of 24 January 2017, especially with regards to an apparent confusion between "interior of the ship" and "hull".
- The word "hull" in your original question is in fact not the primary word used in the Technical Guidelines. We refer instead to the "interior of the ship" – one condition for the use of the interior of the ship as impermeable floor subsequently referring to the hull's integrity, another condition referring to paint chips, another to the cutting of the bottom part of the ship, etc).
- That preliminary reply of 25 January 2017 should be read together with the answer to your latest official query and the April 2016 Technical Guidelines (2016/C 128/01), section 2.2.2. Notably: *It should be noted that the possibility to consider the interior of the ship as "impermeable floor" does not deny the hull of the ship its hazardous character (e.g. when it is covered with hazardous paint) nor does it suspend the Regulation's requirements applicable to hazardous items.*

Best regards,

Emilien

From: Lissie Klingenberg Jørgensen [<mailto:likjo@mst.dk>]
Sent: Wednesday, March 22, 2017 10:22 AM
To: GASC Emilien (ENV)
Subject: SV: Can the hull of a ship be stored outside an impermeable area during the dismantling of the ship

Dear Emilien

Do you have any objections if we also share this correspondence with the Parliament?

Venlig hilsen

Lissie Klingenberg Jørgensen
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Miljø- og Fødevareministeriet
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NY MILJØSTYRELSE

Den 1. februar 2017 er Styrelsen for Vand- og Naturforvaltning (SVANA) og Miljøstyrelsen blevet lagt sammen under navnet Miljøstyrelsen – en ny grøn velfærdsstyrelse med fokus på miljø i bred forstand. Styrelsen vil i en periode have adresse både på Strandgade 29, 1401 København K og på Haraldsgade 53, 2100 København Ø.

Fra: Emilien.GASC@ec.europa.eu [<mailto:Emilien.GASC@ec.europa.eu>]
Sendt: 25. januar 2017 17:05
Til: Lissie Klingenberg Jørgensen
Emne: RE: Can the hull of a ship be stored outside an impermeable area during the dismantling of the ship

Dear Lissie,

Thank you for your email. I'm not sure I understand the bit highlighted below. In 2.2.2., the obligation to handle elements of the ship on impermeable floors kicks in from the moment said element is handled ("handling starts with the cutting/separation of elements from the ship").

Best regards,

Emilien

From: Lissie Klingenberg Jørgensen [<mailto:likjo@mst.dk>]

Sent: Tuesday, January 24, 2017 2:15 PM

To: GASC Emilien (ENV)

Subject: Can the hull of a ship be stored outside an impermeable area during the dismantling of the ship

Dear Emillien

I hope you are well.

We have a question regarding the Commissions interpretation on SRR, and the use of ships bottom as an impermeable surface for handling hazardous materials and waste.

In section 2.2.2. of your technical guidance note the guidance states that the interior of the ship itself can be considered as an impermeable floor in the context of the regulation if a set of requirements are complied with. We take that to mean that the hull itself is not considered a hazardous material or waste in the context of the regulations requirement in regards to the handling of hazardous materials, and of waste generated during the ship recycling process, and that the hull can be stored outside an impermeable area. Is this the Commissions view on the correct interpretation of the regulation?

Best regards

Lissie Klingenberg Jørgensen

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Ministry of Environment and Food of Denmark

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