

Frequently asked question:

Prohibition on use Single Use Plastic: DGS Order 5 of 2019 and Addendum No. 1 to said Order

<u>Issued on</u>	<u>Last Updated on</u>
14 January 2020	

<u>Question</u>	My vessel is using various sizes of single use plastic bags. Will plastic bags irrespective of sizes will be counted as a single SUP item?
<u>Answer</u>	Yes, plastic bags irrespective of size will be considered as only one Single Use Plastic item.

<u>Question</u>	<p>The SIP is to include a list of all single-use-plastic on board with the exception of those exempted from the definition. The list will need to be separated into three groups which will represent a prohibition sequence as follows:</p> <p>List A – 50% of the total list of SUPs identified in the SIP that are to be prohibited from being on board by 1 April 2020.</p> <p>List B – 75% of the total list of SUPs identified in the SIP that are to be prohibited from being on board by 1 July 2020.</p> <p>List C – 90% of the total list of SUPs identified in the SIP that are to be prohibited from being on board by 1 October 2020.</p> <p>The remaining 10% of SUPs on board after 1 October 2020 will be comprised of those excluded from the SUP definition.</p> <p>Q1: Should the list include the number of each material? For example, onboard the ship there are 20 plastic bags of one use, 100 plastic straws.</p> <p>Q2: In the above definition of the A, B, and C lists, there is the phrase “prohibition from being onboard”. Does it mean that these materials are prohibited to be onboard the vessel or does it mean that their use is prohibited during vessels’ stay in Indian waters?</p> <p>Q3: Are the materials that should be included in the list A,B and C ship specific or should each company develop its own A,B and C lists</p>
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<u>Answer</u>	<p>Ans1: No there is neither a need to identify and nor to list number of each SUP items on board.</p> <p>Ans 2: The phrase “ Prohibition from being onboard” means the following:  <b>Foreign Flagged- ships while at a place or port in India:</b> These ships are not allowed to use prohibited items while at a place or port in India. However, these items are allowed to be there on board such vessels provided kept stored at identified locations.</p> <p><b>Indian Flagged-Ships:</b> These ships are not allowed to have such items on board.</p> <p>Ans 3: Each ship should have a ship specific list.</p>
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<u>Question</u>	<p>What does 10% mean? Does it mean 10% of the different types of SUP on board or 10% of total quantity spread over the different types? How is the % to be calculated? Does it mean a percentage of the number of items or volume or weight? Weight of course would be the more accurate measure. However implementing this requirement to any degree of accuracy will be difficult.</p>
<u>Answer</u>	<p>10% is based on number of SUP items and not on total quantities. All plastic bags irrespective of their size shall be considered consisting of one item and it goes for say other items like plastic bottles.</p>

<u>Question</u>	<p>Biodegradable plastic with a certificate from the manufacturer’ – we find it highly unlikely that all biodegradable plastic will be issued with a certificate. It is probably just poor choice of words and it should be changed to ‘Biodegradable plastic with a stamp, marking or certificate from the manufacturer’ or something similar.</p>
<u>Answer</u>	<p>Yes, biodegradable plastic with a stamp, marking or certificate from manufacturer or something similar shall not be considered for prohibition under DGS Order 5 of 2019 and same is so stated in Addendum No.1 to this order.</p>

<u>Question</u>	<p>In section 2.1 of Draft Addendum No. 1, reusable plastic items are excluded from the definition of single use plastic. We seek confirmation that reusable plastic items</p>
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	such as commercial size dispensers for fluids (e.g. shampoo, cleaning products, etc.) are also excluded, since such items are used more than once before depleted.
<u>Answer</u>	Yes, such items are excluded provided they are re-used/re-filled on the ship itself and not discarded after single use.

<u>Question</u>	Section 2.2 further clarifies that the definition of single use plastics includes only items that are completely made of plastic. Please confirm our understanding that items with multi-layered packaging (e.g. foil-lined condiment packets, etc.) are not included within the definition of single use plastics.
<u>Answer</u>	Yes, multi-layered plastic will not be considered for prohibition provided they are biodegradable with a stamp, marking or certificate from the manufacturer' or something similar.

<u>Question</u>	In section 2.3, Draft Addendum No. 1 distinguishes items used on board ship from cargo related items and packaging. As large quantities of items are often stored on board passenger ships for use on board, we seek confirmation that such stores are considered to be cargo for the purposes of the Order.
<u>Answer</u>	Crew and passenger personnel effects are already exempted and can be stored on ship. Any SUP other than that is cargo-related to be detailed in the list.

<u>Question</u>	Section 2.5 of the Draft Addendum provides examples of practical exclusions for medical and life-saving equipment. We request clarification that the exclusion similarly extends to plastics used for sanitation such as plastic/latex gloves, trash bags, etc., and to personal protective equipment (PPE) including respirator cartridges, gloves, suites, boot covers and related items.
<u>Answer</u>	Personnel protective equipment including respirator cartridges, gloves, suites, boots and related packaging are excluded from prohibition. Latex/rubber are not plastics and are excluded from prohibition. Plastics used for sanitation are nor excluded from prohibition.

<u>Question</u>	<p>The requirement in section 3.1.2 to list an inventory of 10% of items which the ship intends to continue using appears to correspond to the earlier-referenced methodology listed in section 1.5 (labeled 1.3.3), which allows ships to continue to use 10% of total single use plastic inventory items based on operational needs of different ship types (March 31, 2020 for passenger ships). However, the text and requirements of section 3.1.3 (labeled 3.1.2) do not provide the same level of clarity. As drafted, it may be read to permit an increase over time in the percentage of inventory items that may continue to be used on ships (from 10% to 50% to 75% to 90%). In contrast, section 4 reflects an intent to increasingly prohibit single use plastics from being onboard from 50% to 75% to 90%, as identified in paragraph 19 of Order 5, by December 1, 2020 for foreign flagged passenger ships. The text in section 3 could be clarified to avoid confusion.</p>
<u>Answer</u>	<ol style="list-style-type: none"><li data-bbox="397 909 1432 1060">1. The purpose of this Order and its Addendum is to dissuade ships from using Single use plastic items. Therefore, inventory once prepared should not be changed unless there are slips in the preparation of an inventory.</li><li data-bbox="397 1071 1432 1350">2. The aim of the Order is to help smooth removal of Single Use Plastic items from ships especially Indian ships by giving enough time to find alternatives. Therefore, the Addendum allows ships to identify from the list prepared, list these items and prohibit use of these items on board ships, just prior to date of prohibition.</li></ol>