



THE REPUBLIC OF LIBERIA
LIBERIA MARITIME AUTHORITY

Marine Notice

POL-007
Rev. 07/20

TO: ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF MERCHANT SHIPS, AND AUTHORIZED CLASSIFICATION SOCIETIES

SUBJECT: Use of Halogenated Hydrocarbons (Halon) and other Ozone Depleting Substances

References: (a) Maritime Regulation 2.35
(b) MARPOL 73/78 Annex VI
(c) SOLAS Chapter II-2 Regulation 10
(d) [IMO Resolution A.719\(17\)](#)
(e) [IMO Circular FP.1/Circ.46](#)
(f) [Liberian Marine Notice FIR-001](#)
(g) [Liberian Marine Notice POL-009](#)

Supersedes: Marine Notice POL-007, dated 06/12

The following changes have been included: **Revised to incorporate additional referenced (d) and (e).**

PURPOSE:

This Notice 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 effects 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-2/10 still permits the use of Halogenated Hydrocarbons (Halon) as a fire extinguishing media on vessels built before 1 October 1994. 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 Notice 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 by amendment of SOLAS 1974 via MSC Resolution 27(61) to use alternative fire extinguishing systems and media on new buildings after 1 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.

2.0 System Replacement

The Liberian Administration has not established a phase out date for existing Halon installations and systems using CFCs on ships registered in the Liberian flag. It is the Administration'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 as long as the systems remain serviceable.

3.0 Emissions

Subject to the provisions of regulation 3 of MARPOL Annex VI, any deliberate emissions of ozone depleting substances shall be prohibited. Deliberate emissions include emissions occurring in the course of 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. This Administration should be notified immediately by any shipowner/operator of emissions arising from leaks of an ozone depleting substance whether or not the leaks were deliberate.

4.0 Replenishment Sources

- 4.1 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.
- 4.2 Liberia is a party to the Convention and Protocol. Therefore, the Administration should be notified immediately if any shipowner/operator experiences difficulties in obtaining replenishment Halon supplies.

5.0 Inspection and Testing of the Halon System

- 5.1 Halon systems are to be maintained as per the guidelines set forth in Marine Notice [FIR-001](#), Maintenance and Inspection of Fire-Protection Systems and Appliances
- 5.2 Due to the increasing difficulty with regards to locating servicing facilities and suppliers for the testing and maintenance of existing fixed Halon fire suppression systems and

components. The Administration will consider a relaxed maintenance schedule with regards to the hydrostatic testing of the Halon cylinders as follows:

- 5.2.1. The hydrostatic testing interval of 20 years for the Halon storage cylinders may be extended by five (5) years provided the following conditions are met:
 - a. A cylinder has not been discharged during its service history;
 - b. Cylinder contents are verified by weighing or isotropic measurement;
 - c. Cylinder pressure/levels are verified to be acceptable;
 - d. A thorough visual inspection of cylinders reveal no potential defects; and
 - e. Each cylinder is to be gauged or ultrasonically tested to the extent considered necessary by the cognizant class society surveyor and the wall thickness readings kept on board for future comparative reference.
- 5.2.2 In addition, a thorough examination shall be made of all accessible component parts of the Halon system, including control valves and connections, to verify satisfactory condition and freedom from leakage; and selected control valves shall be opened out for internal examination to the extent necessary.
- 5.2.3. Any suspect cylinders that do not meet the provisions stated above must be hydrostatically tested or taken out of service. If a cylinder is taken out of service the fixed Halon system must still be capable of supplying sufficient Halon to meet the fire suppression requirements for the compartments that the system is designed to protect.
- 5.2.4 The aforementioned cylinder inspection requirements shall be completed annually except for the requirement for ultrasonic testing/thickness gauging until the end of the five (5) year period of extension. The ultrasonic testing/thickness gauging of the cylinders shall be repeated no later than 36 months after the implementation of this dispensation as part of the applicable annual servicing requirement of the Halon system.
- 5.3 Consideration for the application of the relaxed 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 Administration.

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