Frequently asked question:

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

Issued on	Last Updated on
14 January 2020	

Question	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?
Answer	Yes, plastic bags irrespective of size will be considered as only one Single Use
	Plastic item.

Question	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:
	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.
	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.
	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.
	The remaining 10% of SUPs on board after 1 October 2020 will be comprised of
	those excluded from the SUP definition.
	Q1: Should the list include the number of each material? For example, onboard the
	ship there are 20plastic bags of one use, 100platci straws.
	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?
	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
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Answer	Ans1: No there is neither a need to identify and nor to list number of each SUP items
	on board.
	Ans 2: The phrase "Prohibition from being onboard" means the following:
	Foreign Flagged- ships while at a place or port in India: 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.
	Indian Flagged-Ships: These ships are not allowed to have such items on board.
	Ans 3: Each ship should have a ship specific list.

Question	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.
Answer	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.

Question	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.
Answer	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.

Question	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

	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.
Answer	Yes, such items are excluded provided they are re-used/re-filled on the ship itself
	and not discarded after single use.

Question	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.
Answer	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.

Question	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.
Answer	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.

Question	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.
Answer	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.

Question	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.
Answer	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.
	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.