

Circular 215/ 2019

To: Vessel Owners, Managers, Masters, Officers, Deputy Registrars and Other Interested Parties

Subject: EU legislation – Inventory of Hazardous Materials (IHM)

Attachments:

MEPC 269.(68) Guidelines

EU Ship Recycling Regulation (1257/2013)

Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships

Date: 17th October 2019

No applicability *(as per EU Ship Recycling Regulation (1257/2013), Art. 2.2):*

(a) any warships, naval auxiliary, or other ships owned or operated by a state and used, for the time being, only on government non-commercial service;

(b) ships of less than 500 gross tonnage (GT);

(c) ships operating throughout their life only in waters subject to the sovereignty or jurisdiction of the Member State whose flag the ship is flying.

Summary

Keeping an up-to-date inventory on board a ship throughout its life-cycle is a key requirement laid down in both the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships (herein after referred to as “the Convention” or “the HKC”) and the EU ship recycling Regulation. The EU Regulation’s requirements for the development of the Inventory are in fact almost entirely based on the respective requirements of the Convention.

An IHM developed in accordance with the EU Regulation must be compiled taking into account the relevant IMO guidelines. Nevertheless, EU legislation sets a few more requirements for the inventory than the Convention does. Therefore, it is essential that the development and maintenance of the IHM in pursuance of the Ship Recycling Regulation (SRR) is done in a harmonised and comprehensive manner in the light of the international knowledge and experience as reflected most notably in the relevant IMO guidelines, while taking into account the specificities of the EU legislative context, in particular of the Regulation itself.

The Hong Kong Convention and the IMO guidelines

The HKC covers the design, construction, survey, certification, operation and recycling of ships to facilitate safe and environmentally sound recycling. In accordance with Regulation 5 of the Annex of the HKC, each ship shall have on board an IHM. The IHM shall be verified either by the Administration or by any person or organisation authorised by it.

In the wake of the adoption of the HKC, the IMO has published a number of guidelines on ship recycling. As per the EU Regulation, the IMO guidelines, in their updated form, shall be taken into account when compiling the IHM (as per resolution MEPC 269(68), preparing a Visual/Sampling Check Plan (VSCP), conducting flag State surveys (as per resolution MEPC 222(64)), or detailed inspections of the port State (as per resolution MEPC 223(64)).

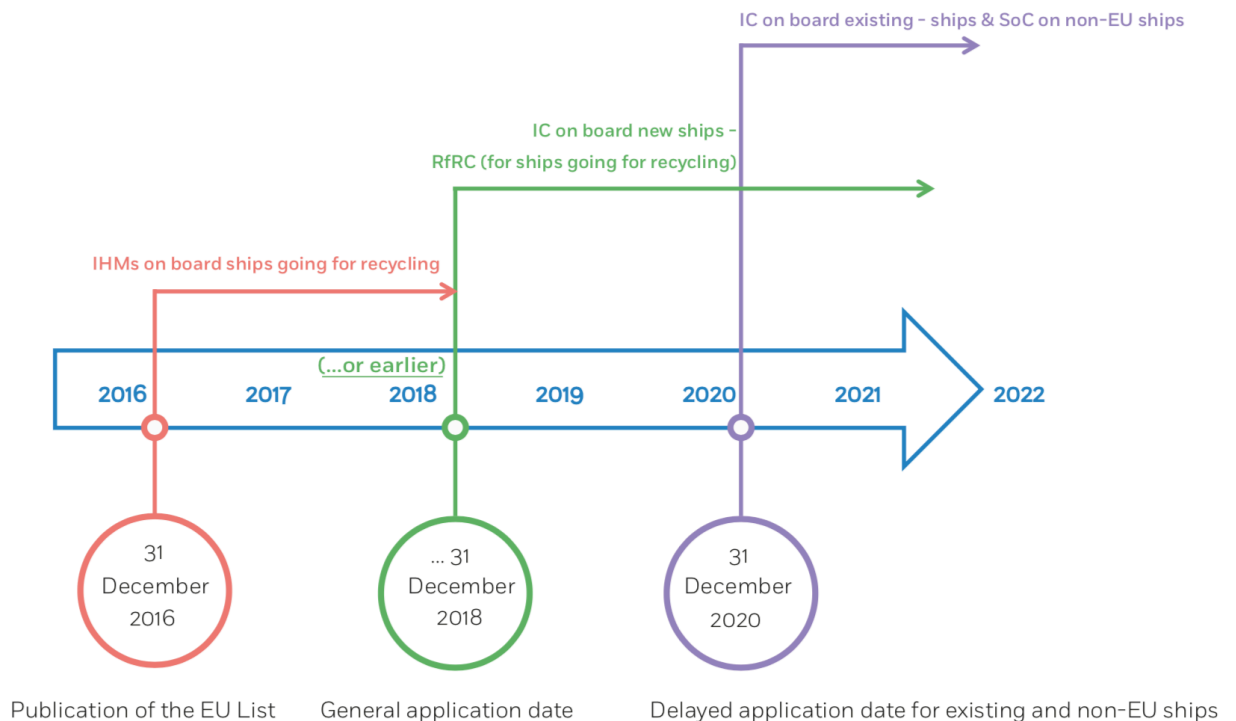
The EU Ship Recycling Regulation

Inventory of Hazardous Material and Ship Recycling are topics which are getting more and more attention in the shipping industry because of recent entry into force (with effect from 31 December 2018) of EU Ship Recycling Regulation (1257/2013).

Main subject of the above mentioned regulation is the onboard availability of the Inventory of Hazardous Materials (IHM), verified either by the Administration or a Recognised Organization authorized by it, accompanied by the relevant Certificate. The IHM shall be prepared taking into consideration the relevant IMO Guidelines (MEPC 269.(68) Guidelines).

From 31 Dec 2020, all non-EU flagged ships which are calling at EU ports or anchorages would need an IHM with a valid Certificate onboard.

MILESTONES FOR THE APPLICATION OF THE SRR IN RELATION TO THE IHM



SRR - Ship Recycling Regulation

IHM - Inventory Hazardous Materials

IC - Inventory Certificate

RfRC Ready for Recycling Certificate

For new ships, IHM is prepared by the shipyards, based on documentation obtained from equipment suppliers in the form of Material Declarations and Supplier Declaration of Conformities.

All ships shall be subject to a survey regime and they shall carry on board a ship-specific 'Inventory Certificate' issued by the administration or a RO authorised by it and supplemented by Part I of the IHM.

MCI will delegate to approved ROs survey certification for the compliance with the EU Regulation under subject.

For further enquiries, please contact Maritime Cook Islands at technical@maritimecookislands.com