



Maritime Circular No.45

To:

Ship-Owners / Managers / Operators /Charterers, Registration Officers (RegOffs), Recognised Organisations (ROs), SLMARAD Departments (All)

Subject:

Inventory of Hazardous Materials (IHM) for ships calling at EU ports or anchorage areas

Date:

17th December 2020

References:

Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 – The Hong Kong Convention

Resolution MEPC.269(68) - 2015, Guidelines for the Development of the Inventory of Hazardous Materials

Regulation (EU) No 1257/2013 of the European Parliament and of the Council on ship recycling- EU Ship Recycling Regulation

Resolution MEPC.222(64) – 2012 Guidelines for the Survey and Certification of Ships under the Hong Kong Convention

EMSA Guidance on the Inventory of Hazardous Materials

Purpose

To inform all interested parties for the implementation of Regulation (EU) No.1257/2013 on ship recycling (hereinafter “the Regulation “or “EU SRR“), to ships calling at a port or anchorage of any country of the European Union (EU) and provide relevant guidelines for the development and maintenance of Inventories of Hazardous Materials (hereinafter “IHM”).

Background

The Convention for the Safe and Environmentally Sound Recycling of Ships (hereinafter “the HKC”) was adopted in 2009 to effectively address, in a legally binding instrument, the environmental and occupational health and safety risks related to ship recycling, taking into account the particular characteristics of maritime transport and the need to secure the smooth withdrawal of ships that have reached the end of their operating lives. Upon entry into force, the HKC will require new ships and existing ships of 500 GT and above, no later than 5 years after the entry into force of the Convention, or before going for recycling, if this is earlier, to have onboard a valid International Certificate of Compliance on IHM. The objectives of the IHM under the HKC is to document ship-specific information on the actual hazardous materials present on board in order to protect health and safety of the crew and of workers at ship recycling facilities and avoid environmental pollution when the ship is going for recycling. The European Parliament formally adopted the EU SRR on 22nd of October 2013. The EU SRR entered into force on 30 December 2013 and requires all non-EU-flagged ships of 500 GT and above calling at EU ports or anchorage areas; from 31 December 2020, to have onboard a valid IHM with a Statement of Compliance in the format specified in Appendix 3 of the HKC. The EU SRR is aimed at facilitating early ratification of the Hong Kong Convention 2009 - both within the EU and in other countries outside the EU- by applying controls to ships and ship recycling facilities on the basis of the Hong Kong Convention.

Considering the EU SRR is nearly aligned with the Hong Kong Convention and includes various references to this Convention and related Guidelines, the Sierra Leone Maritime Administration has determined that there are efficiencies to be gained through combining compliance inspections to avoid unnecessary duplication and administrative burdens of multiple ship visits for Owners. This will also ensure that upon entry into force of the Hong Kong Convention, the International Certificate of Compliance on IHM may be issued without additional shipboard inspection/survey.

Definitions

'Hazardous Material' means any material or substance which is liable to create hazards to human health and/or the environment.

'Ship' means a vessel of any type whatsoever operating or having operated in the marine environment, and includes submersibles, floating craft, floating platforms, self-elevating platforms, Floating Storage Units (FSUs), and Floating Production Storage and Offloading Units (FPSOs), as well as a vessel stripped of equipment or being towed.

'New ships' means ships whose building contract, keel laid, or delivery is placed on or after the date of effective application, as per Article 3(2) of EU SRR.

Application

1. The EU SRR requires all non-EU-flagged ships of 500 GT and above calling at EU ports or anchorage areas; from 31 December 2020, to have onboard a valid IHM along with a Statement of Compliance issued by an authorized Recognized Organization, as specified in paragraph 9 of this Circular.
2. This Circular does not apply to:
 - 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 GT
3. The IHM shall be ship specific and developed in accordance with MEPC.269(68) and EUSRR and shall be verified by a Recognized Organization (RO) as per the requirements of relevant resolutions and regulations. The official language to be used should be English. The Inventory shall consist of 3 parts as follows:
 - a. Part I: List of hazardous materials contained in ship structure or equipment, their location and approximate quantities and referred to Annex I and Annex II of EU SRR. This part needs to be properly maintained and updated throughout the operational ship's life.
 - b. Part II: List of operationally generated wastes onboard; this part is to be incorporated in the Inventory prior to recycling.
 - c. Part III: Stores; this part is to be incorporated in the Inventory prior to recycling.
4. New ships shall comply with the requirements of the EU SRR at the design and construction stage. Shipbuilders are responsible to collect the Materials Declaration and Supplier's Declaration of Conformity from the suppliers, as per Appendix 3 of MEPC.269(68).
5. Existing ships shall comply, as far as practicable, with the requirement to have an IHM onboard from 31 December 2020 (reference: Article 32.2(b) of EU SRR). It shall identify, at least, the

hazardous materials listed in Annex I of the EU SRR. Any new installations onboard, containing hazardous materials referred to in Annex II of the Regulation, shall be included in the IHM.

6. Sierra Leonean vessels calling EU ports or anchorage areas are subject to the following surveys:
 - a. An initial survey which shall be conducted before the ship is put in service, or before the inventory SOC is issued. For existing ships, an initial survey shall be conducted by 31 December 2020.
 - b. A renewal survey which shall be conducted at intervals, which shall not exceed five years.
 - c. An additional survey which shall be conducted after a change, replacement or significant repair of the structure, equipment, systems, fittings, arrangements and material, which has an impact on the IHM.
 - d. A final survey, which shall be conducted prior to the ship being taken out of service and before the recycling of the ship has started. Prior to recycling, the Inventory shall, in addition to the properly maintained and updated Part I, incorporate Part II for operationally generated wastes and Part III for stores, and be verified by an authorized Recognized Organization, taking into account the guidelines in Resolution MEPC.222(64). For existing ships destined for ship recycling, the initial survey and the final survey may be conducted at the same time.
7. Ships destined for recycling in a recycling facility listed in the European List, shall have onboard a Ready for Recycling Statement of Compliance which shall be issued by the RO upon successful completion of the final survey. The SoC shall be supplemented by the inventory of Hazardous Materials and the ship recycling plan.
8. The responsibility for maintaining, updating and ascertaining the conformity of Part I of the IHM lies primarily with the shipowners. If any changes are made as per paragraph 6(c), Part I of the IHM should be updated accordingly.
9. Recognized Organizations authorized to carry out the verification of IHM and issue the Statement(s) of Compliance are:
 - Asia Shipping Certification Services (ASCS)
 - Bureau Veritas (BV)
 - Dromon Bureau of Shipping (DBS)
 - Korean Register of Shipping (KRS)
 - Maritime Lloyd (ML)
 - New United Marine Certification Services LT (NUMS)
 - Overseas Marine Certification Services Inc. (OMCS)
 - Phoenix Register of Shipping S.A (PHRS)
 - Russian Maritime Register of Shipping (RMRS)

10. Any other Recognized Organization that wishes to be authorized by the Administration shall submit the below documentation:
- a. Procedure for survey, verification and certification of IHM
 - b. IHM Survey report Checklist
 - c. Template of Statement of Compliance on Inventory of Hazardous Materials
 - d. Template of Ready for Recycling Statement of Compliance
 - e. Procedure for approval and oversight of IHM Expert companies

For additional information please contact SLMARAD at info@slmarad.com

Revision Status

Date	Revision	Comments - Changes
15/12/2020	0	Initial - Adopted
15/12/2020	1	Amended paragraph 9
17/12/2020	2	Amended paragraph 9