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Marine Consultancy Services

Simplified Introduction to

Hong Kong Int. Convention for the Safe and Environmentally Sound Recycling of Ships
&
EU Regulation on Ship Recycling EC No: 1257 / 2013

For the attention of Owners of Existing Ships

Hong Kong Int. Convention for the Safe and Environmentally Sound Recycling of Ships (HKC)

IMO has developed "The Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships", hereafter referred to as «Hong Kong Convention», which has been adopted in 2009.

In accordance with Regulation 5 of the Annex of the HKC, cach ship of 500 GT and above shall have on board an **IHM**. The **IHM** shall be verified either by the Administration or by any person or organization authorized by it.

EU Regulation on Ship Recycling EC No: 1257 / 2013 (EU SRR)

The EU SRR is to a large extent based on the IMO HKC on Ship Recycling and contains various references to the HKC and related Guidelines.

The delay on the entry into force of the HKC has triggered EU to take action, and a new Regulation of the European Parliament and of the Council on Ship Recycling has been adopted and entered into force on 30 December 2013.

In accordance with Article 12 of EU SSR, all ships flying the flag of a third country (Nun-EU Flag) shall have on board an IHM when calling at a port or anchorage of a Member State.

Application of EU SSR:
For existing ships, an IHM should be on board after ***31/12/2020***.

The EUS SRR brings into force an early implementation of the requirements of the HKC in EU level, therefore contributing to its global entry into force.

Port Sate Control (PSC)

Member States shall apply PSC provisions for ships. Under this control, ship shall be obliged to submit a copy of the statement of compliance together with the Inventory, which, if valid, shall be considered sufficient for the inspection to be approved.
If no certificate or if an invalid certificate is found on board, or any other clear ground revealed, then a PSCO should either undertake a detailed inspection OR should ask the relevant authority of the Member State to carry out a detailed inspection.
A ship may be warned, detained, dismissed or excluded from the ports or offshore terminals under the jurisdiction of a Member State in the event that it fails to submit to the relevant authorities of that Member State a copy of the relevant certificate62 as appropriate and on request of those authorities

Inventory of Hazardous Materials (IHM)

IHM is a list that identifies the hazardous materials that are contained in ship's Structure; or equipment, their location and approximate quantities shall also be identified.

An IHM developed in accordance with the Regulation must be compiled taking into account the relevant **IMO guidelines** {*Res. MEPC.269(68)*} **EU SRR** requirements.

An up-to-date IHM is to be maintained on board a ship throughout its life-cycle.

The IHM is divided in three parts:

Part I Ship's structure and equipment - handled during operation for existing vessels

Part II Operationally generated wastes - developed at the end of the vessel life shortly before it is recycled

Part III Stores - developed at the end of the vessel life shortly before it is recycled

Scope of IHM		New & Existing Ships	Only upon Preparation for Recycling	
		Part I Ship Structure & Equip.	Part II Generated wastes	Part III Stores
HKC	**EU SRR**			
Table A	**Annex I**	√		
Mandatory for New ships; Existing ships and New Installations.				
Table B	**Annex II**			
Only for new ship				
Table C			√	√
Potentially Hazard Materials				
Table D				√
Potentially hazard consumable materials				

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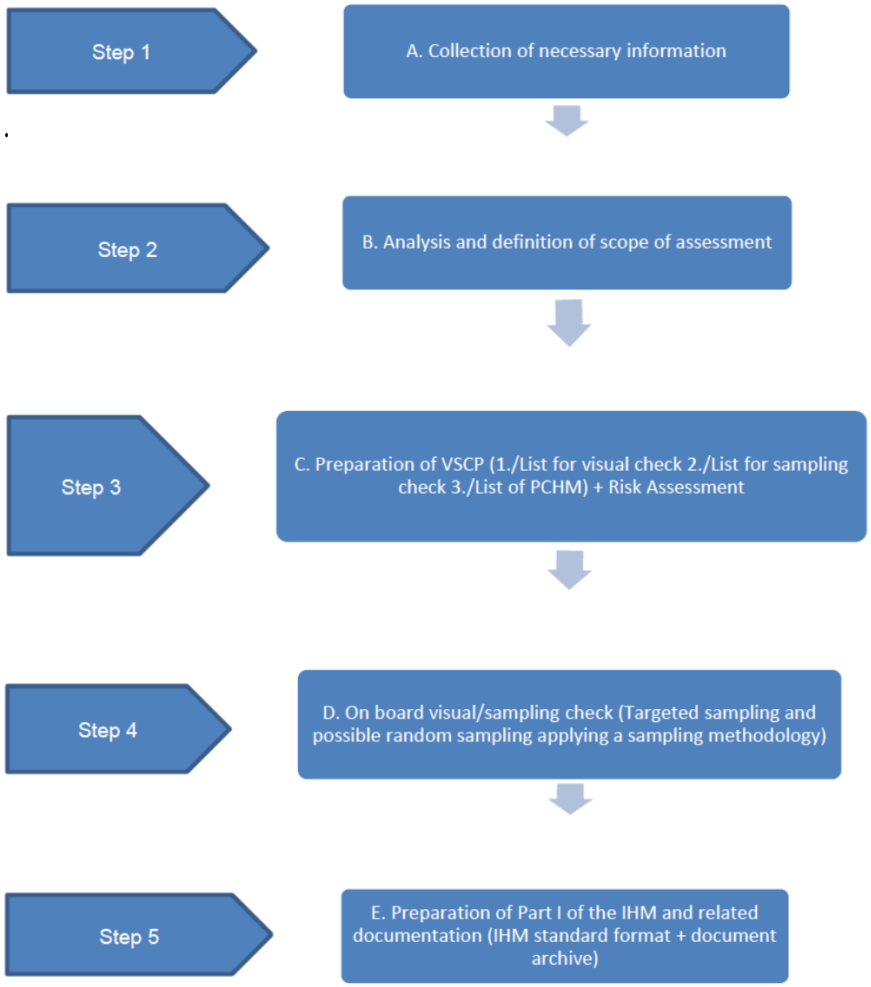
Development process of the IHM Part I for Existing Ships

Part I of the Inventory for existing ships should be developed by the shipowner, in accordacne with IMO guidelines.

The process should include five steps:



Information includes aintenance, conversion/repair documents; certificates, manuals, ship's plans, drawings and technical specs; product information data sheets (Material Declarations); hazardous material inventories, historical class records

At least, the assessment to cover all materials listed in table A of appendix 1
The results of the assessment should be reflected in the visual/sampling check plan (Step 3).

Visual/sampling check plan (VSCP) should be based on the following 3 lists:

1) .List of equipment, system and/or area for visual check;
2) List of equipment, system and/or area for sampling check (which cannot be specified regarding the presence of the materials by document or visual analysis); and
3) List of equipment, system and/or area classed as "potentially containing hazardous material" (which cannot be specified regarding the presence of the materials by document analysis) - justification shall be erequired.

To be carried out accoring to visual/sampling check plan. When a sampling check is carried out:

- Samples should be taken;
- Sample points should be marked on the ship plan;
- Sample results should be referenced.
- Sampling check should be carried out by **expert assistance**.

If any equipment, system and/or area is classed as either "containing hazardous material" or "potentially containing hazardous material", their approximate quantity and location should be listed in part I of the Inventory.

Procedure for the maintenance of Part I of the IHM

The shipowner is responsible for the maintenance of Part I of the IHM during the lifetime of the ship.

Part I of the IHM should belong to the ship.

In accordance with the IMO guidelines, shipowners should implement a series of measures to ensure the

conformity of Part I of the Inventory.

In this context, designating a person as responsible for maintaining and updating the Inventory is a responsibility for the shipowner.

The main responsibility of the designated person is to be incoprporated in Owner's Managment System, and to include:

- Maintenance and updating of the IHM in accordance with the IMO guidelines and this guidance.
- Updating the IHM if a major conversion or extensive repair works are undertaken.
- Collecting and maintaining the relevant documentations (as defined by IMO guidleines) for the respective changes to the IHM.

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How you can get help for IHM Preparation / Certification (Exiting Ships)

	Support for IHM Preparation	IHM Verification by Class	Survey	Certification
LR	LR has approved **Service Suppliers** to provide support for IHM preparation, onboard sample check and laboratory analysis LR also Provide a Dynamic PDF file to assist for IHM compilation.	The completed IHM, along with the required supporting documents, including the 'Visual/Sampling Check Plan' are to be submitted to **LR Approval Teams**, via LR Local office, for approval **LR Approval Team** located in Miami, Piraeus, Singapore and Southampton	After satisfactory review of IHM & associated docs for completeness, LR Approval Team will liaise with the shipowner to arrange a suitable time and location for the V**erification Survey**. To verify that the contents of the IHM are an acceptable representation of the items on board the ship.	On completion of the verification survey the attending surveyor will issue an IHM Statement (SoC) of Compliance to the ship
DNV/GL	DNV/GL approved **HazMat Expert** to prepare the IHM, which involves document collection, on-board sampling check, and laboratory analysis. DNVGL provide also IHM Green Server software support a for the IHM preparation, certification and maintenance.	The following documents are to be submitted: Part I IHM, signed by the originator; & Supporting documents, including Visual sampling check plan (VSCP)	Verified IHM Part I shall be stamped & shall be kept on board. **Initial survey** for existing vessels shall be conducted	On completion of the Initial Survey CD (Compliance Declaration) for IHM part I will be issued.
NKK	NKK has its subsidiary company "ClassNK Consulting Service", which provide services to develop the IHM for existing ships as an "expert"	The developed IHM is to be submitted to NKK Head Office (SMD), together with the Application & Documents prescribed by NKK guidelines NKK will carry out: 1. Review of the Visual Sampling Check Plan (VSCP) 2. Onboard inspection 3. Review of the IHM	After satisfactory review of IHM & associated docs, a Verification Survey is to be carried out on behalf of the ship's flag.	On completion of the Verification Survey, NKK issues SoC (statement of compliance) for Part I of the IHM.
ABS	ABS require shipowners to engage a company from the **ABS's list of approved External Specialists** for the development of IHM Part 1	Once an IHM is completed, it will be submitted to an ABS Engineering office, together with other docs, including Visual Sampling Check Plan (VSCP) for review.	After satisfactory review of IHM & associated docs, Initial Survey is to be carried out on board.	On completion of the verification surveys, the initial IHM Booklet (ship details & Part 1 of the Inventory) is stamped as accepted and a certificate issued.

NOTES:

- **The IHM needs to be ship-specific**
- **Compared to HKC, the EU SRR includes for 2 additional hazardous materials, perfluoro-octane sulfonic acid (PFOS) and hexabromocyclododecane (HBCDD), which are required to be included in IHM.**
- **IHM Compilation and Certification takes time (estimated as not less than 12 weeks for each ship from starting to completion)**