



# REPUBLIC OF THE MARSHALL ISLANDS

MARITIME ADMINISTRATOR

Marine Notice

No. 2-011-56

Jun/2025

**TO: ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF  
MERCHANT SHIPS, AND RECOGNIZED ORGANIZATIONS**

**SUBJECT: Inventory of Hazardous Materials Companies and Experts**

- References:**
- (a) **Hong Kong Convention**, *Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships*, 2009, adopted 15 May 2009
  - (b) **Regulation (EU) No. [1257/2013](#)** of the European Parliament and of the Council on ship recycling and amending **Regulation (EC) No. 1013/2006** and **Directive 2009/16/EC**, as amended
  - (c) **ISO/IEC 17025:2017**, *General requirements for the competence of testing and calibration laboratories*
  - (d) **ISO/IEC 17020:2012**, *Conformity assessment - Requirements for the operation of various types of bodies performing inspection*
  - (e) **RMI Marine Notice [1-005-1](#)**, *Consolidated Fees and Charges List for Official Documents and Services*
  - (f) **RMI Marine Notice [2-011-61](#)**, *Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships*
  - (g) **RMI [Technical Circular 1](#)**, *Shipboard Equipment and Service Provider Approvals*

## PURPOSE

This Marine Notice (MN) establishes the Republic of the Marshall Islands (RMI) Maritime Administrator's (the "Administrator") criteria for recognizing Companies that seek to provide Inventory of Hazardous Materials (IHM) services pursuant to the:

- European Union (EU) Ship Recycling Regulation (SRR) (which applies to non-EU-flagged ships from 31 December 2020); or
- Hong Kong Convention.

This MN supersedes Rev. May/2020.

## BACKGROUND

Both the EU SRR and the Hong Kong Convention require ships to develop and maintain an IHM and undergo survey and certification to verify that the requirements are met. One method to meet these requirements is for the ship owner or operator to engage an IHM Expert or IHM Expert Company to conduct the requisite visual and/or sampling checks, ensure that the samples are tested by a certified laboratory, and develop the IHM.<sup>1</sup> See [MN 2-011-61](#).

## APPLICABILITY

This MN applies to IHM service suppliers seeking Administrator recognition under §1.0 below.

## DEFINITIONS

- **IHM Expert** means a person with the appropriate training, qualifications, and knowledge to conduct hazardous materials surveys for developing and maintaining an IHM. The person should have experience in ship structures, hazardous materials handling, and sufficient knowledge of how to create an IHM, and of all the relevant requirements.
- **IHM Expert Company** means an entity employing or contracting IHM Experts to conduct any relevant process work or task for creating or updating IHMs. The IHM Expert Company must use a documented management system and apply suitable standards covering its relevant activities.

## REQUIREMENTS

### 1.0 Administrator Recognition

- 1.1 Where a ship owner or operator requests that the Administrator complete IHM verification and certification rather than a Recognized Organization (RO), an IHM Expert Company must be recognized in accordance with the below process.
- 1.2 To receive Administrator recognition, unless it holds an approval certificate from an authorized RO as provided in §2.0 below, an IHM Expert Company must meet the following requirements:
  - 1.2.1 Implement quality processes and procedures, including those covering work and safety, in accordance with ISO 17020 or an equivalent standard that covers the quality processes and procedures for the relevant activities;
  - 1.2.2 Provide evidence of their IHM Expert qualification requirements (e.g., experience, training, licenses);
  - 1.2.3 Ensure that any laboratory utilized to test samples for developing the IHM is accredited or certified according to recognized standards (ISO/IEC 17025 or equivalent), see RMI [Technical Circular 1](#); and

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<sup>1</sup> See International Maritime Organization (IMO) Resolution [MEPC.379\(80\)](#), as amended by [MEPC.405\(83\)](#).

- 1.2.4 Agree to undergo future periodic audits including, vertical contract audits, or inspections of vessels and documentation, as necessary, to ensure that the quality of the work is maintained within accepted standards.
- 1.3 The Administrator reserves the right to withdraw its recognition at its sole discretion, including for non-performance, malperformance, or expiration of the underlying certification.

## **2.0 RO Certificate of Approval**

- 2.1 A certificate of approval issued to an IHM Expert Company from an authorized RO<sup>2</sup> will be accepted by the Administrator as proof that the criteria in the above §1.2 have been met.
  - 2.1.1 The RO's certification must reflect the scope of work the IHM Expert Company is intending to undertake.
  - 2.1.2 The certification must remain valid during the period of work.

## **3.0 Procedure for Obtaining Recognition for IHM Expert Companies**

- 3.1 An entity requesting recognition as an IHM Expert Company must send an email to [IHM@register-iri.com](mailto:IHM@register-iri.com). Attached to the email must be:
  - 3.1.1 a fully completed RMI Form [MI-298L](#), *IHM Expert Company Details*; and
  - 3.1.2 valid certificates of approval from an RMI RO (PDF only).
- 3.2 The fee associated with obtaining recognition can be found in MN [1-005-1](#).
- 3.3 The IHM Expert Company Recognition Letter will be valid for a period of one year, renewable annually on the condition that all approvals are maintained, and the Administrator is satisfied with the company's performance.

## **4.0 Recognized IHM Expert Companies**

IHM Expert Companies recognized by the Administrator can be found [here](#).

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<sup>2</sup> See MG [2-11-15](#), *Organizations Acting on Behalf of the Republic of the Marshall Islands Maritime Administrator*