



REPUBLIC OF THE MARSHALL ISLANDS

MARITIME ADMINISTRATOR

Marine Guideline

No. 2-11-9

Jun/2025

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

**SUBJECT: European Union and United Kingdom Ship Recycling Regulations, and
Inventory of Hazardous Materials**

- References:**
- (a) **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
 - (b) **European Maritime and Safety Agency (EMSA)**, [Best Practice Guidance on the Inventory of Hazardous Materials](#), updated 5 June 2018
 - (c) **EMSA**, [Guidance on inspection of ships by the port States in accordance with Regulation \(EU\) 1257/2013 on ship recycling](#), updated 14 October 2019
 - (d) **United Kingdom [Statutory Instrument 2019 No. 277](#)**, *The Ship Recycling (Facilities and Requirements for Hazardous Materials on Ships) (Amendment) (EU Exit) Regulations 2019*

PURPOSE

This Marine Guideline (MG) provides information on the requirements for developing, maintaining, surveying, and certifying an Inventory of Hazardous Materials (IHM) for ships under the European Union (EU) and United Kingdom (UK) Ship Recycling Regulations (SRRs).

This MG supersedes Rev. Aug/2022 and has been amended, as the *Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships* (the Hong Kong Convention) entered in force 26 June 2025.¹ It also streamlines the remaining EU and UK SRR guidance.

The RMI Maritime Administrator (the “Administrator”) requirements for complying with the Hong Kong Convention are provided in RMI Marine Notice (MN) [2-011-61](#).

¹ The Republic of the Marshall Islands (RMI) acceded to the Hong Kong Convention on 18 January 2024.

BACKGROUND

The EU SRR aimed to facilitate early implementation of the Hong Kong Convention requirements. The Hong Kong Convention was adopted by the International Maritime Organization (IMO) on 15 May 2009. However, the Hong Kong Convention enters into force 26 June 2025.

APPLICABILITY

The EU and UK SRRs apply to new and existing ships of 500 gross tons or more as follows:

- **EU:** Compliance for all non-EU-flagged ships is required since 31 December 2020 when calling at ports or anchorages in EU Member States.
- **UK:** RMI-flagged ships must comply post-Brexit, when calling at UK ports or anchorages.

GUIDANCE

1.0 EU SRR

1.1 Since 31 December 2020 all non-EU-flagged ships must have on board an IHM Part I identifying, at least, the hazardous materials listed in EU SRR, Annex I, and a Statement of Compliance (SoC) when calling at ports or anchorages of an EU Member State.

1.2 EMSA's [*Best Practice Guidance on the Inventory of Hazardous Materials*](#) covers development, maintenance, monitoring, and enforcement of the IHM. The EU SRR Annex I and II hazardous materials lists are based on Hong Kong Convention Appendices 1 and 2. Per footnote 16 (page 7) and Table A, section 6 (Survey and Certification) of the EMSA guidance document, it requires control of two additional substances:

1.2.1 Perfluorooctane sulfonic acid (PFOS) (Annex I).

The control of PFOS applies to RMI-flagged ships on or after 1 January 2026 through amendments² to the International Convention for the Safety of Life at Sea, Regulation II-2/10.11, and the 1994 and 2000 International Codes of Safety for High-Speed Craft.

1.2.2 Brominated Flame Retardant (HBCDD) (Annex II)

² See IMO Resolutions [MSC.532\(107\)](#) as corrected by MSC/107/Add.1/Corr.1, [MSC.536\(107\)](#), and [MSC.537\(107\)](#).

2.0 UK SRR

RMI-flagged ships must have on board an IHM Part I identifying, at least, the hazardous materials listed in EU SRR, Annex I, and a SoC when calling at ports or anchorages of the UK. The UK retained EU SRR requirements in domestic law³ after its withdrawal from the EU.

3.0 IHM Development Summary Tables

Part I <i>Materials contained in ship structure or equipment</i>	
Time of Development	Hong Kong Convention <ul style="list-style-type: none">• New ships: on delivery• Existing ships: not later than 26 June 2030, or before recycling, if this is earlier EU/UK SRRs <ul style="list-style-type: none">• Non-EU flagged ships: before calling at EU Member State, or UK ports or anchorages from 31 December 2020
Items to be listed	Hong Kong Convention <ul style="list-style-type: none">• New ships: Table A[†] and Table B[†]• Existing ships: Table A; Table B, if they can be identified in a practical way as information will be used to support ship recycling processes EU/UK SRRs <ul style="list-style-type: none">• Non-EU-flagged Ships: Annex I
Part II <i>Operationally generated waste</i>	
Time of Development	Hong Kong Convention and EU/UK SRRs <ul style="list-style-type: none">• Before recycling
Items to be listed	Table C[†] <ul style="list-style-type: none">• Potentially hazardous items (Garbage, cargo residues, etc.)

³ Per UK Statutory Instrument [2019 No. 277](#), amendment of direct EU legislation.

Part III <i>Stores</i>	
Time of Development	Hong Kong Convention and EU/UK SRRs <ul style="list-style-type: none"> • Before recycling
Items to be listed	Table C <ul style="list-style-type: none"> • Potentially hazardous items (Stores) Table D[†] <ul style="list-style-type: none"> • Regular consumable goods potentially containing Hazardous Materials (Domestic and accommodation appliances)

[†] See IMO Resolution [MEPC.379\(80\)](#), Appendix 1, *2023 Guidelines for the development of the Inventory of Hazardous Materials*, as amended by [MEPC.405\(83\)](#).

4.0 IHM Survey and SoC Certification for EU and UK SRRs

- 4.1 Upon request, the Administrator will verify an IHM Part I and issue an SoC for vessels wishing to maintain EU or UK SRR standards of certification. This includes the sampling and analysis of PFOS and HCBDD substances.
- 4.2 The EU SRR does not establish a validity period for the SoC, unless so specified by the flag State. The Administrator has determined, after considering the EMSA guidelines covering port State Control, that the five-year limit is also appropriate for a SoC issued under the EU SRR. The Administrator can conduct any additional survey requested by the shipowner and the renewal survey. This work may also be conducted by any RMI Recognized Organization (RO), irrespective of whether the RO classes the vessel.
 - 4.2.1 An SoC must be modeled on the format provided in the EMSA [Guidance on inspection of ships by the port States in accordance with Regulation \(EU\) 1257/2013 on ship recycling](#), Annex 3.
- 4.3 It is recommended to begin IHM compliance planning early for the EU and UK SRRs. IHM development, maintenance, and certification requires significant time, effort, and cost. Refer to MN [1-005-1](#), *Consolidated Fees and Charges List for Official Documents and Services*, and MN [1-005-2](#), *Fees for Official Yacht Documents and Services*.
- 4.4 For further information, contact the Administrator at: IHM@register-iri.com.