



**REPUBLIC OF
THE MARSHALL ISLANDS**
MARITIME ADMINISTRATOR

Marine Notice

No. 2-011-61

Jun/2025

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

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

- References:**
- (a) **Hong Kong Convention**, *Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships*, 2009
 - (b) **IMO Resolution [MEPC.196\(62\)](#)**, *2011 Guidelines for the Development of the Ship Recycling Plan*, adopted 15 July 2011
 - (c) **IMO Resolution [MEPC.210\(63\)](#)**, *2012 Guidelines for Safe and Environmentally Sound Ship Recycling*, adopted 2 March 2012
 - (d) **IMO Resolution [MEPC.211\(63\)](#)**, *2012 Guidelines for the Authorization of Ship Recycling Facilities*, adopted 2 March 2012
 - (e) **IMO Resolution [MEPC.223\(64\)](#)**, *2012 Guidelines for the inspection of ships under the Hong Kong Convention*, adopted 5 October 2012
 - (f) **IMO Resolution [MEPC.379\(80\)](#)**, *2023 Guidelines for the development of the Inventory of Hazardous Materials*, as amended by MEPC.405(83)
 - (g) **IMO Circular [HKSRC.1/Circ.23](#)**, *Accession by the Republic of the Marshall Islands*, issued 18 January 2024
 - (h) **IMO Circular [HKSRC.2/Circ.1](#)**, *Provisional guidance on the implementation of the Hong Kong and Basel Conventions with respect to the transboundary movement of ships intended for recycling*, issued 1 November 2024
 - (i) **RMI Marine Notice [2-011-56](#)**, *Inventory of Hazardous Materials Experts*
 - (j) **RMI [Technical Circular 27](#)**, *Certification of Inventory of Hazardous Materials and Ship Recycling Statistics*

PURPOSE

This Marine Notice (MN) provides the Republic of the Marshall Islands (RMI) Maritime Administrator (the “Administrator”) requirements for compliance with the Hong Kong Convention.

Guidance on regional regulations such as the European Union and the United Kingdom Ship Recycling Regulations is provided in RMI Marine Guideline (MG) [2-11-9](#).

BACKGROUND

The RMI acceded to the Hong Kong Convention on 18 January 2024.¹ It will enter into force for the RMI and its ships on 26 June 2025.

APPLICABILITY

On or after 26 June 2025 the Hong Kong Convention applies to:

- new and existing RMI-flagged ships of 500 gross tons (GT) or more;
- ships entitled to fly the flag of a Party or operating under its authority; and
- Ship Recycling Facilities operating under the jurisdiction of a Party.

The Hong Kong Convention does not apply to:

- warships, naval auxiliary, or other ships owned or operated by a Party and used, for the time being, only on government non-commercial service; and
- ships of less than 500 GT, or to ships operating throughout their life only in waters subject to the sovereignty or jurisdiction of the State whose flag the ship is entitled to fly.

REQUIREMENTS

1.0 General

The design, construction, operation and maintenance, survey, certification, and preparation for recycling must be conducted in accordance with the Hong Kong Convention.

2.0 Inventory of Hazardous Materials: Parts and Time of Development

2.1 The Inventory of Hazardous Materials (IHM) contains:

2.1.1 Part I: materials contained in the ship structure or equipment;

2.1.2 Part II: operationally generated wastes; and

2.1.3 Part III: stores.

2.2 A ship-specific inventory must be developed and by using the standard format in International Maritime Organization (IMO) Resolution [MEPC.379\(80\)](#), Appendix 2, *Guidelines for the development of the Inventory of Hazardous Materials*.

¹ Refer to IMO Circular [HKSRC.1/Circ.23](#).

2.3 Development Time

2.3.1 **New Ships:** The IHM Part I for new ships must be developed at the design and construction stage, identifying hazardous materials listed in the Hong Kong Convention, Appendices 1 and 2, which are contained in ship's structure or equipment, their location, and approximate quantities.

2.3.2 **Existing Ships:** The IHM Part I must be developed by identifying the hazardous materials listed in the Hong Kong Convention, Appendix 1. While the Hong Kong Convention, Regulation 5.2 allows existing ships to comply with these requirements no later than 26 June 2030 or before the ship is recycled, if earlier, the Administrator encourages shipowners to complete the process in a timely manner to prevent difficulties closer to the deadline due to a backlog of ships requiring survey. Compliance with hazardous materials identification is as far as practicable.

A plan must be prepared that describes the visual or sampling check by which the IHM is developed.

2.3.3 **Prior to recycling:** the IHM must, in addition to the properly maintained and updated² Part I, incorporate a Part II for operationally generated wastes, and a Part III for stores, and be verified either by the Administrator or by an authorized Recognized Organization (RO).³

3.0 IHM Development and Maintenance (Part I)

3.1 Developing an IHM will require:

- 3.1.1 collection of necessary information;
- 3.1.2 assessment of collected information;
- 3.1.3 preparation of visual/sampling check plan;
- 3.1.4 onboard visual check and sampling check; and
- 3.1.5 preparing the IHM Part I.

3.2 The Administrator can directly provide services for IHM development and maintenance on RMI-flagged ships, and operators can submit enquiries to IHM@register-iri.com for information and assistance. ROs and other qualified entities that meet the requirements of MN [2-011-56](#) may also provide these services on behalf of the Administrator.

² See IMO Resolution [MEPC.379\(80\)](#), §4.3 and §5.2.

³ See MG [2-11-15](#), *Organizations Acting on Behalf of the Republic of the Marshall Islands Maritime Administrator*

- 3.3 The shipowner must maintain and update the IHM Part I throughout the operational life of the ship, reflecting new installations containing hazardous materials listed in the Hong Kong Convention, Appendix 2. This is especially important after ship repair, conversion, or sale. See IMO Resolution [MEPC.379\(80\)](#), §4.3.2.
- 3.4 Shipowners must implement measures to ensure the conformity of the IHM Part I, see IMO Resolution [MEPC.379\(80\)](#), §5.0 to §7.0. The shipowner must designate a person that is responsible for maintaining and updating the Inventory. Similarly see also MN [2-011-13](#) for existing provisions on the nomination of a responsible person, to control a maintenance and monitoring program for asbestos.

4.0 Survey and Certification

4.1 International Certificate on IHM

Shipowners may choose the Administrator or any RO irrespective of whether the RO classes the vessel, for the IHM Part I verification and issuance of the International Certificate on Inventory of Hazardous Materials. Refer to [Technical Circular 27](#).

4.2 International Ready for Recycling Certificate (IRRC)

- 4.2.1 An IRRC is required for all ships of 500 GT and above being taken out of service and before the recycling of the ship has started. To obtain an IRRC, the ship must undergo a final survey⁴ and be certified as ready for recycling by the Administrator or RO, and prior to being recycled a ship must obtain a ship-specific Ship Recycling Plan⁵ from a Ship Recycling Facility.
- 4.2.2 The IRRC has a maximum validity of three months, and the format must be consistent with Appendix 4 of the Hong Kong Convention.
- 4.2.3 When the ship destined to be recycled has acquired an IRRC, the Ship Recycling Facility must report to its Competent Authority(ies) (Ship Recycling State) the planned start of the Ship Recycling. The report must be in accordance with the reporting format in the Hong Kong Convention, Appendix 6. It must include a copy of the IRRC. The recycling of the ship must not start prior to the submission of the report.
- 4.2.4 [Technical Circular 27](#) requires the RO to annually report to the Administrator with information about ships to which an IRRC has been issued.

⁴ Refer to the Hong Kong Convention, Regulation 10.1.4.

⁵ Refer to IMO Resolution [MEPC.196\(62\)](#).

4.3 Ship Recycling Facilities

- 4.3.1 Ships destined for recycling must only be processed at a Ship Recycling Facility that meets the requirements of the Hong Kong Convention.
- 4.3.2 A shipowner must notify the Administrator or its authorized RO in writing of the intention to recycle a ship as per the Hong Kong Convention, Regulation 24.1.
- 4.3.3 After recycling, the Ship Recycling Facility must send a Statement of Completion of Ship Recycling to their Competent Authority (Ship Recycling State).

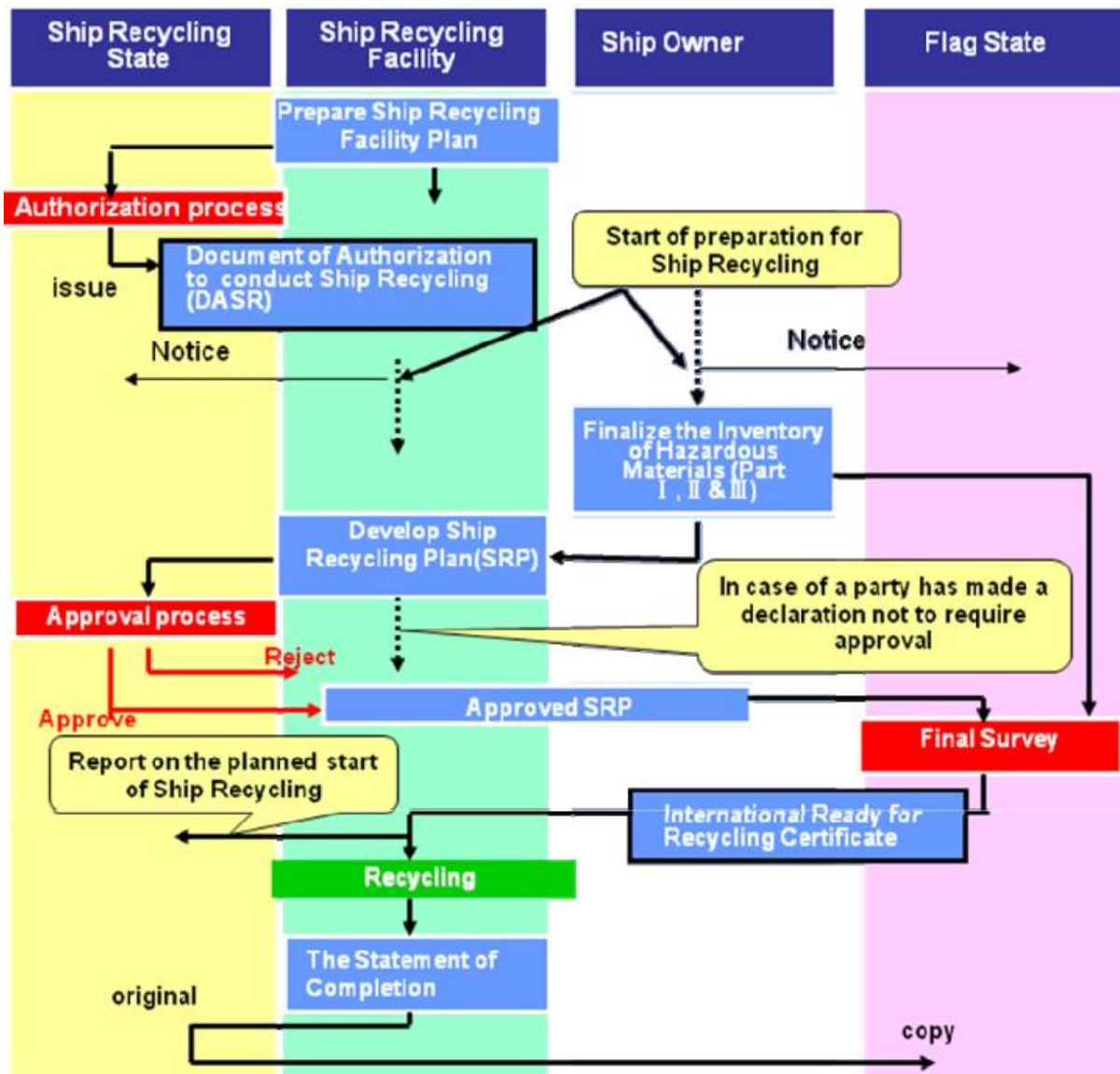
Thereafter the Competent Authority (Ship Recycling State) must submit a copy of the Statement of Completion of Ship Recycling to the Administrator using: technical@register-iri.com.

5.0 Port State Control Inspections and Detection of Violations

- 5.1 Initial Port State Control (PSC) inspections are limited to verifying that there is either an International Certificate on IHM or an IRRC on board.
- 5.2 PSC may conduct a detailed inspection under the Hong Kong Convention, taking into account IMO Resolution [MEPC.223\(64\)](#), where a ship does not carry a valid certificate or there are clear grounds for believing that:
 - 5.2.1 the condition of the ship or its equipment does not correspond substantially with the particulars of the certificate, and/or IHM Part I; or
 - 5.2.2 there is no procedure implemented on board the ship for the maintenance of the IHM Part I.
- 5.3 If a ship is detected to be in violation with the Hong Kong Convention, the Party carrying out the inspection may take steps to warn, detain, dismiss, or exclude the ship from its ports. A Party taking such action must immediately inform the Administrator and an investigation report holding evidence of the violation must be submitted as appropriate to: IHM@register-iri.com.

Appendix

Ship recycling process from preparation to completion (IMO Resolution [MEPC.210\(63\)](#), Appendix 3)



Responsibility of Stakeholders

Ship Recycling State	Ship Recycling Facility	Ship Owner	Flag State
<p>Regulation 16</p> <ul style="list-style-type: none"> • Authorize the Ship Recycling Facilities. <p>Regulation 9</p> <ul style="list-style-type: none"> • Approve SRP. <p>Regulation 25</p> <ul style="list-style-type: none"> • Send a copy of the Statement to the flag State. 	<p>Regulation 18</p> <ul style="list-style-type: none"> • Prepare an SRFP <p>Regulation 9</p> <ul style="list-style-type: none"> • Develop a ship-specific SRP. <p>Regulation 24</p> <ul style="list-style-type: none"> • Notify its Competent Authority of the intent. • Report to its Competent Authority the planned start of Ship Recycling. <p>Regulation 25</p> <ul style="list-style-type: none"> • Issue a statement of Completion and report to its Competent Authority. 	<p>Regulation 5</p> <ul style="list-style-type: none"> • Have on board an IHM. • Finalize IHM including Parts II & III. <p>Regulation 8</p> <ul style="list-style-type: none"> • Provide the information with the SRF. 	<p>Regulation 10</p> <ul style="list-style-type: none"> • Verify IHM, SRP and DASR.