



**REPUBLIC OF
THE MARSHALL ISLANDS**
MARITIME ADMINISTRATOR

Marine Guideline

No. 2-11-9

Aug/2022

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

SUBJECT: Inventory of Hazardous Materials

- References:**
- (a) **Hong Kong Convention, *Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009*, adopted 15 May 2009**
 - (b) **IMO Resolution [MEPC.269\(68\)](#), *2015 Guidelines for the development of the Inventory of Hazardous Materials*, adopted 15 May 2015**
 - (c) **IMO [MEPC 77/INF.5](#), *Calculation of recycling capacity for meeting the entry-into-force conditions of the Hong Kong Convention*, released 8 September 2021.**
 - (d) **RMI Marine Notice [2-011-28](#), *Anti-Fouling Systems Convention***
 - (e) **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**
 - (f) **European Maritime and Safety Agency (EMSA), [Best Practice Guidance on the Inventory of Hazardous Materials](#), updated 5 June 2018**
 - (g) **[UK Ship Recycling \(Facilities and Requirements for Hazardous Materials on Ships \(Amendment\) \(EU Exit\) Regulations 2019](#)**
 - (h) **UK Statutory Instrument [2019 No. 277](#)**

PURPOSE

This Guideline provides information on the requirements for developing, maintaining, surveying, and certifying an Inventory of Hazardous Materials (IHM or Inventory) for ships under:

- the Hong Kong Convention (Convention);
- European Union (EU) Ship Recycling Regulation No 1257/2013 (EU SRR); and
- United Kingdom (UK) Ship Recycling Regulations.

It replaces version Oct/2019 and has been amended to:

- incorporate the UK regulations on ship recycling post Brexit; and
- update the Convention's status with respect to its entry into force.

BACKGROUND

Hong Kong Convention

The Convention was adopted by the International Maritime Organization (IMO) on 15 May 2009. It addresses ship recycling. This includes measures to prevent, reduce, and minimize accidents, injuries, and other adverse effects ship recycling may have on human health and the environment. It also incorporates measures aimed at enhancing the safety and protection of human health and the environment through the operating life of a ship. Although the Convention is comprehensive, the details necessary to comply with it are contained in a guideline, IMO Resolution [MEPC.269\(68\)](#).

The Convention is not in force, but this will occur 24 months after the date on which the conditions in Article 17 are met (see table). The Republic of the Marshall Islands (RMI) has not yet ratified the Convention.

CONVENTION STATUS SUMMARY		
Article 17 Conditions	Threshold	Current Status ¹
Contracting States (CS)	15	19 (condition met)
CS combined gross tonnage as a percentage of the world's merchant shipping	40%	426,940,146 GT, 29.77%
CS combined annual ship recycling volume during the preceding 10 years	3% gross tonnage of CS combined merchant shipping	13,950,584 GT, 0.97%

EU SRR

The EU SRR aims to facilitate early implementation of the Convention requirements.

EMSA's [Best Practice Guidance on the Inventory of Hazardous Materials](#) covers IHM development, maintenance, monitoring, and enforcement. It should be used in complying with the EU SRR

The hazardous materials listed in Annex I and Annex II of the EU SRR are based on those in Appendices 1 and 2 of the Convention. However, the EU Regulation requires the control of two additional hazardous materials:

- Perfluorooctane sulfonic acid (PFOS) (Annex I); and
- Brominated Flame Retardant (HBCDD) (Annex II).

Importantly, PFOS is not applicable to non-EU-flagged ships².

1. See IMO [MEPC 77/INF.5](#), released 8 September 2021.

2. See footnote 16 (page 7) and Table A, section 6 (Survey and Certification) of the EMSA guidance document.

APPLICABILITY

Both the Convention and the EU SRR will apply to new and existing ships of 500 GT or more. A **ship** means:³

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), Floating Production Storage and Offloading Units (FPSOs), including a vessel stripped of equipment or being towed.

Convention: RMI-flagged ships must comply when the Convention enters into force and the RMI has ratified it. However, IMO has invited Member States to apply IMO Resolution [MEPC.269\(68\)](#) as soon as possible.

EU SRR: Compliance for non-EU ships was required from 31 December 2020 when calling at ports or anchorages of an EU Member State.

UK SRR: After withdrawal from the EU, the UK retained requirements of the EU SRR within UK domestic legislation⁴. RMI-flagged ships must comply when calling at ports or anchorages in the United Kingdom (UK).

GUIDANCE

1.0 IHM Parts and Time of Development

1.1 IHM Parts:

- .1 Part I: materials contained in the ship structure or equipment;
- .2 Part II: operationally generated wastes; and
- .3 Part III: stores.
- .4 The parts above provide ship-specific information on the actual hazardous materials present onboard. The information will be used by the ship recycling facilities to manage the types and amounts of materials identified in the IHM.

1.2 Convention

- .1 **New Ships**⁵: The IHM, part I for new ships is developed at the design and construction stage, identifying hazardous materials listed in Appendices 1 and 2 which are contained in ship's structure or equipment, their location, and approximate quantities.

3. The definition of "ship" is taken from Article 2 of the Convention; however, a nearly identical definition appears in the EU SRR.
4. Per UK Statutory Instrument [2019 No. 277](#), amendment of direct EU legislation.
5. See Convention Regulation 1.4. For "new ships" under the EU SRR, see Article 3.

- .2 **Existing Ships**⁶: The IHM, part I is developed by identifying the hazardous materials listed in Appendix 1, no later than five years after the Convention's entry into force or before the ship is recycled, if this is earlier. Compliance with hazardous materials identification is "as far as practicable."
 - a. A plan must be prepared that describes the visual or sampling check by which the IHM is developed, taking into account guidelines developed by the IMO.
 - b. The standard format for developing the IHM is in Appendix 2 of [MEPC.269\(68\)](#).
- .3 Prior to recycling, the IHM, part II and part III are developed before a ship is recycled.

1.3 EU SRR

A non-EU-flagged ship 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 an EU Member State.

1.4 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.

6. See Convention Regulation 1.3. Under the EU SRR, an existing ship is considered to be any ship that is not new and any non-EU flagged ship.

1.5 IHM Development Summary Table

	Part I Materials contained in ship structure or equipment	Part II Operationally generated waste	Part III Stores
Time of Development	<p>Convention <i>New ships:</i> at delivery</p> <p><i>Existing ships:</i> not later than 5 years after the entry into force of the Convention, or before recycling, if this is earlier</p> <p>EU SRR <i>Non-EU flagged ships:</i> before calling at EU Member State, or UK ports or anchorages from 31 December 2020</p>	<p>Convention Before recycling</p> <p>EU SRR Not applicable to Non-EU-flagged ships</p>	
Items to be listed	<p>Convention <i>New ships:</i> Table A[†] and Table B[†]</p> <p><i>Existing ships:</i> Table A; Table B, if they can be identified in a practical way as information will be used to support ship recycling processes</p> <p>EU SRR <i>Non-EU Ships:</i> Annex I</p>	<p>Table C[†]: Potentially hazardous items (Garbage, cargo residues, etc.)</p>	<p>Table C: Potentially hazardous items (Stores)</p> <p>Table D[†]: Regular consumable goods potentially containing Hazardous Materials (Domestic and accommodation appliances)</p>

[†] See IMO Resolution [MEPC.269\(68\)](#), Appendix 1

2.0 IHM Development and Maintenance

2.1 Developing an IHM will require:

- .1 collection of necessary information;
- .2 assessment of collected information;
- .3 preparation of visual/sampling check plan;
- .4 onboard visual check and sampling check; and
- .5 preparing the IHM, part I.

- 2.2 Classification Societies and other qualified entities may provide services for IHM development and maintenance on RMI-flagged ships. The RMI Maritime Administrator (the “Administrator”) considers an entity to be qualified to provide such IHM services if it:
- .1 is certified under ISO 17020, or an equivalent standard that covers the quality processes and procedures for the relevant activities;
 - .2 meets the requirements for a recognized independent testing laboratory in RMI Technical Circular 1; and
 - .3 is different from the entity that will be verifying the IHM and issuing the SoC so that there are no conflicts of interest.
- 2.3 The Administrator has recognized independent [IHM Expert Companies](#), which satisfy the conditions above, to assist shipowners and operators in developing the IHM, part I.
- 2.4 It is the responsibility of the shipowner to maintain and update the IHM, part I throughout the operational life of the ship, reflecting new installations containing hazardous materials listed in Appendix 2 of the Convention. This is especially important after ship repair, conversion, or sale. See IMO Resolution [MEPC.269\(68\)](#), paragraph 4.3.2.
- 3.0 IHM Survey and Certification
- 3.1 The Administrator is prepared to verify the IHM, part I and issue a SoC. It is also prepared to conduct any additional survey requested by the shipowner and the “five-year” renewal survey. This work may also be conducted by any RMI Recognized Organization (RO), irrespective of whether the RO classes the vessel.
- 3.2 A SoC may be issued for compliance with the EU SRR (which also covers the Convention) or the Convention in advance of its entry into force on a voluntary basis.
- 3.3 For ships wishing to comply with the Convention on a voluntary basis, a SoC will be issued. It will be converted into an *International Certificate on Inventory of Hazardous Materials* after the Convention enters into force and is ratified by the RMI.
- 4.0 Recommendations
- 4.1 Do not underestimate the amount of time, effort and cost required to develop, maintain and certify an IHM. Planning for compliance with the EU SRR and Hong Kong Convention should start sooner rather than later.
- 4.2 RMI-flagged ships that intend to call at EU Member State, or UK, ports or anchorages need to develop their IHM and have it verified for compliance with the EU SRR. The applicable provisions of the IMO guideline should also be implemented. This should be completed before calling at an EU Member State, or UK, port or anchorage.

- 4.3 RMI-flagged ships should plan for compliance with the Hong Kong Convention. This includes understanding how it will apply to new builds and existing ships, implementing the applicable provisions of the IMO guideline, and considering IHM, part I certification.
- 4.4 For those building new ships prior to the Convention entering into force, coordination with the shipbuilder is recommended to reduce the difficulty in ascertaining hazardous materials (and putting together an IHM) on an as-built ship.
- 4.5 Refer to MN [2-011-28](#) as it highlights control measures for anti-fouling systems containing hazardous materials that must be considered as part of the IHM, part I.
- 4.6 For further information, contact the Administrator at: IHM@register-iri.com.