



**REPUBLIC OF  
THE MARSHALL ISLANDS**  
**MARITIME ADMINISTRATOR**

**Marine Notice**

**No. 2-011-56**

**May/2020**

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

**SUBJECT: Inventory of Hazardous Materials 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) **EU SRR, Regulation (EU) No [1257/2013](#) of the European Parliament and of the Council on ship recycling**, 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](#)**, *Fees for Official Documents and Services*  
(f) **RMI Marine Guideline [2-11-9](#)**, *Inventory of Hazardous Materials*  
(g) **RMI [Technical Circular 1](#)**, *Shipboard Equipment and Service Provider Approvals*

**PURPOSE**

This Marine Notice establishes the criteria for recognizing companies seeking to provide Inventory of Hazardous Materials (IHM) services under:

- the EU SRR (which applies to non-EU ships from 31 December 2020); or
- Hong Kong Convention (in advance of its entry into force on a voluntary basis).

It supersedes version Mar/2020, clarifying its applicability.

**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. A method of meeting 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. See RMI Marine Guideline 2-11-9.

Although the [guidelines](#) for the development of the IHM under the Hong Kong Convention refer to “drawing upon such expert assistance,” “expert”, or “expert party”, it is the European Maritime and Safety Agency [guidance](#) that establishes competence for an IHM Expert or IHM Expert Company. It is the responsibility of anyone using the IHM Expert or IHM Expert Company to confirm that the expert or company is competent.

## APPLICABILITY

This Marine Notice applies to service suppliers seeking recognition from the Republic of the Marshall Islands Maritime Administrator (the “Administrator”) under §2.0 of this Notice.

## REQUIREMENTS

### 1.0 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.

### 2.0 Administrator Recognition

2.1 Where a ship owner or operator requests the Administrator to verify the IHM and issue the SOC, rather than a RO, an IHM Expert Company must be recognized.

2.2 To be recognized by the Administrator an IHM Expert Company must meet the following requirements, unless it holds a certificate of approval from a RO as provided in §3.0 of this Notice.

2.2.1 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;

2.2.2 provide evidence of each IHM Expert’s qualifications (e.g., experience, training, licenses);

2.2.3 ensure that the equipment used on board the ship for sampling checks is calibrated and certified according to recognized standards;

2.2.4 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](#);

2.2.5 undergo an audit at its premises by the Administrator or [RO](#); and;

- 2.2.6 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.

### **3.0 Certificate of Approval from a RO**

- 3.1 A certificate of approval issued to an IHM Expert Company from a RO listed in RMI Marine Guideline [2-11-15](#) will be accepted by the Administrator as proof that the criteria in §2.2 of this Notice have been met.
  - 3.1.1 The RO's certification must reflect the scope of work the IHM Expert Company is intending to undertake.
  - 3.1.2 The certification must remain valid during the period of work.

### **4.0 Procedure for Obtaining Recognition**

- 4.1 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:
  - 4.1.1 a fully completed RMI form, [MI-298L](#), *IHM Expert Company Details*;
  - 4.1.2 valid certificates of approval from an RMI RO (PDF only); and
  - 4.1.3 Proof (wire transfer or credit card confirmation) that payment has been made as required in §4.2 of this Notice.
- 4.2 An application to the Administrator for recognition as an IHM Expert Company must be accompanied by a non-refundable payment of \$500. All fees are in US dollars. See RMI Marine Notice [1-005-1](#) for the fee schedule and payment methods.
- 4.3 Neither submitting an application nor paying fees guarantees recognition. This is at the sole discretion of the Administrator.
- 4.4 After a satisfactory review and fee payment, recognition for a one-year period will be granted with a letter from the Administrator.
- 4.5 The Administrator reserves the right to withdraw its recognition as it solely deems appropriate, including for non-performance, mis-performance, or expiration of the underlying certification.

### **5.0 Recognized IHM Companies**

- 5.1 IHM Companies recognized by the Administrator can be found [here](#)