



**REPUBLIC OF
THE MARSHALL ISLANDS**
MARITIME ADMINISTRATOR

Marine Guideline

No. 2-11-9

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

SUBJECT: Inventory of Hazardous Materials

- References:**
- (a) **Ship Recycling Convention**, *Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009*, adopted 19 May 2009, as amended
 - (b) **IMO Resolution [MEPC.269\(68\)](#)**, 2015, *Guidelines for the Development of the Inventory of Hazardous Materials*, adopted 15 May 2015, as amended
 - (c) **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
 - (d) **RMI [Technical Circular 27](#)**, *Issuance of Statement of Compliance for Inventory of Hazardous Materials*

PURPOSE

This Guideline informs shipowners and operators about the requirements for the development and maintenance of an Inventory of Hazardous Materials (IHM) for new and existing ships under the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 (the “Ship Recycling Convention” or “Convention”).

This Guideline also provides advice about how to create and what to include on a ship’s inventory of materials, both hazardous and non-hazardous, in order to facilitate the eventual recycling of a ship. This Guideline has been renumbered to be included with other International Convention for the Prevention of Pollution from Ships (MARPOL)/pollution Guidelines. It has been amended to incorporate the European Union (EU) Regulation No. 1257/2013 of the European Parliament and of the Council on ship recycling, which amends Regulation (EC) No 1013/2006 and Directive 2009/16/EC.

BACKGROUND

The Ship Recycling Convention was adopted by the International Maritime Organization (IMO) on 15 May 2009, and will enter into force 24 months after the date of ratification by at least 15 States; representing a combined merchant fleet of at least 40% of the gross tonnage (GT) (and a combined maximum annual ship recycling volume during the preceding 10 years of not less than 3%) accede to it. As of this date, only five (5) States, representing a combined merchant fleet of 20.34% of the GT, have ratified the Convention. The Republic of the Marshall Islands (RMI) has not yet ratified the Convention.

The Convention undertakes to prevent, reduce, minimize and, to the extent practicable, eliminate accidents, injuries, and other adverse effects on human health and the environment caused by ship recycling, and enhance ship safety, 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 IMO guidance. The Convention addresses new and existing ships.

Upon its entry into force, the Convention will require the development and maintenance of an IHM for new and existing ships. An IHM is a list of hazardous materials, waste, and stores that make up a ship. It also identifies their location and approximate quantities onboard the ship.

More recently, the EU adopted 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. This regulation brings into force an early implementation of the requirements of the Convention, including requirements for foreign or non-EU flagged ships. More specifically, starting after 31 December 2020, when calling at a port or anchorage of an EU Member State, a foreign or non-EU flagged ship shall have on board an IHM which shall identify at least the hazardous materials listed in Annex I of the Regulation.

APPLICABILITY

Both the Convention and the EU Regulation will apply to ships of 500 GT or more including submersibles, floating crafts, floating platforms, self-elevating platforms, Floating Storage Units (FSUs), and Floating Production Storage and Offloading Units (FPSOs), including a vessel stripped of equipment or being towed.

GUIDANCE

- 1.0 The requirement to develop and maintain an IHM does not become mandatory until the Ship Recycling Convention comes into force and has been ratified by the Marshall Islands. However, because the IMO invited Member governments to apply the guidelines as soon as possible and because the EU Regulations will probably come into force before the Convention does, shipowners and operators of new and existing RMI ships are encouraged to voluntarily implement the applicable provisions of the guidance in IMO Resolution [MEPC.269\(68\)](#) and the requirements of EU Regulation No. 1257/2013.
- 1.1 For those building new ships, coordination with the shipbuilder is recommended in order to reduce the difficulty in ascertaining hazardous materials (and putting together an IHM) on an as-built ship. Several Classification Societies, as well as other private sector entities, are currently providing services for the development and maintenance of the IHM.
- 1.2 As shown in the table below, Part I of the IHM is developed at the design and construction stage, and Part II and Part III are developed before a ship is recycled. However, Part I of the IHM for existing ships, whose building contracts have been placed before the entry into force of the Convention, is developed not later than five (5) years after the entry into force of the Convention.

1.3 Composition of the IHM

	Part I Materials contained in ship structure or equipment	Part II Operationally generated waste	Part III Stores
Time of Development	New Construction: at delivery Existing ships: not later than five (5) years after the entry into force of the Convention	Before recycling	
Items to be listed in the IHM	<p>Table A: Prohibited and/or restricted materials (Asbestos, PCBs, Ozone depleting substances, Anti-fouling compounds and systems, etc.)</p> <p>Table B: Hazardous materials (Cadmium, Hexavalent Chromium, Lead, Mercury, Radioactive Substances, etc.)</p> <p>* Existing ships: as far as practicable</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>

CONCLUSION

The Administrator has authorized its Recognized Organizations (ROs), upon shipowner request, to survey, verify, and issue to RMI ships Statements of Compliance for Part I of the IHM developed in preparation for the upcoming EC Regulation and eventually the incoming Convention. These Statements will be converted into an International Certificate on IHM after the entry into force of the Ship Recycling Convention and ratification by the Marshall Islands. Services pursuant to this Regulation may be undertaken irrespective of whether or not the vessel is classed by the RO. The time to get started would be now.