



Technical Circular

No.: 052/2017

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To whomsoever it may concern

Subject: Republic of Marshall Islands marine guidelines on Inventory of Hazardous Materials.

- Republic of Marshall Islands (RMI) has issued a marine guideline No. 2-11-9 (copy attached) providing information about the requirements for development and maintenance of an Inventory of Hazardous Materials (IHM) under Hong Kong Convention, 2009(Ship Recycling Convention).
- Salient points of the guidelines are as follows:
 1. The Inventory of Hazardous Materials is divided into three (3) parts:
 - Part I Materials contained in ship structure and equipment;
 - Part II Operationally generated wastes; and
 - Part III Stores.
 2. New construction: Part I of IHM is developed at the time of design and construction stage.

Existing ships: Part I of IHM is developed based on the guideline provided in MEPC 269 (68) appendix 4 & 5(i.e. mainly collection of information, assessment of collected information, preparation of visual/sampling check plan, onboard visual/sampling check plan)

Part II and Part III for both new ship and existing ship are to be developed before ship is recycled.

(Composition of IHM is provided in annex)
 3. Presently, the Convention is not entered into force and not ratified by the Administration.
 4. However, EU adopted Regulation (EU) No. 1257/2013 which brings into force an early implementation of the requirements of the Hong Kong convention for development and maintaining IHM, including requirements for foreign or non-EU flagged ships. This requires a foreign or non-EU flagged ship, when calling at a port or anchorage of an EU Member state; to have onboard an IHM latest by 31 December 2020.

5. In the view of above, administration encourage the voluntarily implementation of the applicable provisions of IMO guidance (resolution MEPC.269 (68)) and Regulation (EU) no. 1257/2013 for RMI flagged ships.
 6. To comply with the EU requirements, all non-EU flagged ships of 500 GT and 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 requires:
 - Inventory of Hazardous Material including plan for visual or sampling check.
 - Updated Inventory of Hazardous Materials throughout the operational life of the ship, reflecting new installation containing hazardous materials which is identified in appendix 2 of the convention and relevant changes in ship structure and equipment.
 - Statement of Compliance on Inventory of Hazardous Materials.
- Ship owners/ operators and masters are advised to be guided by above.

Annex

	Part I	Part II	Part III
	Materials contained in ship structure or equipment	Operationally generated waste	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	Table A: Prohibited and/or restricted materials (Asbestos, PCBs, Ozone depleting substances, Anti-fouling compounds and systems, etc.) Table B: Hazardous materials (Cadmium, Hexavalent Chromium, Lead, Mercury, Radioactive Substances, etc.) * Existing ships: as far as practicable	Table C: Potentially hazardous items (Garbage, cargo residues, etc.)	Table C: Potentially hazardous items (Stores) Table D: Regular consumable goods potentially containing Hazardous Materials (Domestic and accommodation appliances)

Enclosure:

1. RMI Marine guidelines 2-11-9.

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