



# Technical Circular

No.: 002/2021

Date: 11<sup>th</sup> January 2021

## **Subject: Marshall Islands on remote sampling/ surveys with respect to preparation of IHM required under EU SRR due to COVID-19 pandemic.**

1. The Marshall Islands Administration vide Technical Circular No. 29 has provided their agreement for undertaking remote surveys/samplings on board RMI-flagged ships with respect to the Inventory of Hazardous Materials (IHM) required under European Union (EU) Regulation 1257/2013, in view of restrictions imposed due to COVID-19 pandemic.
2. When, due to COVID-19 restrictions, onboard attendance is not possible by an IHM Expert Company for the purposes of conducting the sampling portion of the IHM Part I preparation, the Administrator agrees to sampling by the ship's crew under the remote guidance and direction of the IHM Expert Company. Same is on the condition that documented training and qualification records are provided for the crew which cover the sampling procedures, hazard awareness, and safety measures to be implemented, including the requisite personal protective equipment (PPE). The IHM Expert Company is to ensure that on board visual and sampling checks are carried out in accordance with the visual and sampling checks plan prepared by the IHM Expert Company. The samples are then to be packaged and sent ashore to the IHM Expert's appointed laboratory, and the IHM Part I process completed in the normal manner.
3. Where a ship has a semi- or partially-completed IHM with an associated approved Statement of Compliance that does not contain on board (either targeted or random) sampling, the Administrator exceptionally accepts remote surveys provided that documentation is kept on board the ship indicating when it will be feasible for qualified samplers to complete the IHM with respect to limitations caused by the COVID-19 pandemic.
4. When, due to Covid-19 restrictions, onboard attendance is not possible and where an IHM Part I has been prepared fully, the Administrator agrees to Recognized Organizations (ROs) conducting remote initial IHM surveys subject to their satisfaction with the contracted IHM Expert Company's experience, and that the IHM Part I complies fully with the EU Ship Recycling Regulation requirements and the guidelines contained in International Maritime Organization Resolution MEPC.269 (68). Confirmatory verification on-board will be carried out at the next scheduled statutory survey where physical attendance of the RO surveyor is possible.



. This Technical Circular and the material contained in it is provided only for the purpose of supplying current information to the reader and not as an advice to be relied upon by any person.  
. While we have taken utmost care to be as factual as possible, readers/ users are advised to verify the exact text and content of the Regulation from the original source/ issuing Authority.

5. The Technical Circular No. 29 is valid until 30 June 2021, unless otherwise extended and a copy of same is to be retained on-board the ship to present as evidence to EU port State control should there be any questions on the Administrator' policy regarding this issue.
6. Ship owners/ operators and masters of Marshall Islands flagged ships are advised to be guided by above.

**Enclosure:**

1. Marshall Islands Technical Circular No. 29, dated 02 January 2021.

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### EU IHM- REMOTE SAMPLING/SURVEYS

#### 1.0 Introduction

1.1 This Technical Circular conveys the Republic of the Marshall Islands (RMI) Maritime Administrator's (the "Administrator") express exceptional agreement for remote surveys/sampling to be conducted on board RMI-flagged vessels with respect to the Inventory of Hazardous Materials (IHM) required under European Union (EU) Regulation 1257/2013, **when, due to Coronavirus Disease (COVID-19) restrictions, onboard attendance is not possible.**

#### 2.0 Remote Survey/Sampling

2.1 When, due to COVID-19 restrictions, onboard attendance is not possible by an IHM Expert Company for the purposes of conducting the sampling portion of the IHM Part I preparation, the Administrator agrees to sampling by the ship's crew under the remote guidance and direction of the IHM Expert Company. This is on the condition that documented training and qualification records are provided for the crew which cover the sampling procedures, hazard awareness, and safety measures to be implemented, including the requisite personal protective equipment (PPE).<sup>1</sup> The IHM Expert Company is to ensure that on board visual and sampling checks are carried out in accordance with the visual and sampling checks plan prepared by the IHM Expert Company. The samples are then to be packaged and sent ashore to the IHM Expert's appointed laboratory, and the IHM Part I process completed in the normal manner.

2.2 Where a vessel has a semi- or partially-completed IHM with an associated approved Statement of Compliance that does not contain on board (either targeted or random) sampling<sup>2</sup>, the Administrator exceptionally accepts remote surveys provided that documentation is kept on board the ship indicating when it will be feasible for qualified samplers to complete the IHM with respect to limitations caused by the COVID-19 pandemic.

<sup>1</sup>Refer to the section on Training & Qualification in the European Maritime and Safety Agency's, *Best Practice Guidance on the Inventory of Hazardous Materials*, updated 5 June 2018. Safety measures to be implemented include the use of PPE.

<sup>2</sup>This scenario is envisioned where a ship may be carrying an SOC based on IMO Resolution A. 962(23) which introduced the concept of a "Green Passport."

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2.3 When, due to Covid-19 restrictions, onboard attendance is not possible and where an IHM Part I has been prepared fully, the Administrator agrees to Recognized Organizations (ROs) conducting remote initial IHM surveys subject to their satisfaction with the contracted IHM Expert Company's experience, and that the IHM Part I complies fully with the EU Ship Recycling Regulation requirements and the guidelines contained in International Maritime Organization Resolution [MEPC.269\(68\)](#). Confirmatory verification on-board will be carried out at the next scheduled statutory survey where physical attendance of the RO surveyor is possible.

### **3.0 Technical Circular Carriage Onboard and Validity**

3.1 This Technical Circular should be retained on-board the vessel to present as evidence to EU port State control should there be any questions on the Administrator's policy regarding this issue.

3.2 This Technical Circular is valid until **30 June 2021**, the date on which the "harmonized approach" by the EU on enforcing its ship recycling regulation expires, unless otherwise extended. See also RMI Marine Safety Advisory No. [33-20](#), *European Union Enforcement of Inventory of Hazardous Materials*.

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