



Technical Circular

No.: 032/2023

Date: 9th October 2023

Subject: Ratification of IMO's 2009 Hong Kong International Convention for Safe and Environmentally Sound Recycling of Ships (HKC).

1. The IMO's 2009 Hong Kong International Convention for Safe and Environmentally Sound Recycling of Ships (also known as 'HKC') has met the ratification criteria and is set to enter into force on 26 June 2023.
2. The HKC aims to ensure that, ships, when being recycled after reaching the end of their operational lives, do not pose any unnecessary risks to human health, safety and to the environment.
3. Upon entry into force, the HKC will operate in simultaneous with the EU Ship Recycling Regulation No. 1257/2013, that is already in force.
4. Individual flag states may have additional flag specific requirements for compliance.

5. Salient features of the HKC

- i. HKC is applicable to;
 - a. Ships (both New and Existing) above 500 GT
 - b. Ship Recycling Facilities (SRF)
- ii. HKC establishes controls on;
 - a. use of prohibited/restricted hazardous materials in ships throughout the life of ship
 - b. ship recycling
 - c. ship recycling facilities

6. Compliance Timeline for Ships:

i. New Ship

The shipbuilder is responsible for compliance. The compliance timeline for new ship is as below, where the:

- a. building contract is placed on or after 26th June 2025; or
- b. keel is laid on or after 26th December 2025; or
- c. ship delivery is on or after 26th December 2027

ii. Existing Ships:

Existing ships will be required to comply with the convention latest by 26th June 2025 but not later than 25th June 2030.

Owners/managers of the existing ships are responsible for compliance.



- . 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.

Where the owner intends to recycle the ship on or after 26th June 2025, that particular ship will be required to comply with HKC irrespective of timeline specified above.

7. Compliance Requirements for Ships:

i. Operational Life:

- a. Ships will be required to have a valid Part I of Inventory of Hazardous Materials (IHM) placed onboard duly supplemented with International Certificate on Inventory of Hazardous Materials (ICIHM), showing evidence that the ship has implemented controls on use of hazardous materials as identified in HKC.
- b. Such Part I of IHM is to be prepared in accordance with the IMO guidelines MEPC.379(80) on development of inventory of hazardous materials, as amended.
- c. The Part I of IHM will be required to be properly maintained and updated throughout the operational life of the ship, reflecting new installations containing Hazardous Materials and relevant changes in ship structure and equipment.
- d. Ships will be subjected to Initial, Renewal, Additional Surveys and Certification by flag administration or its RO and inspection by port state, flag state, as applicable.

ii. End of Operational Life and prior to Recycling

- a. Prior to recycling, the IHM, in addition to the properly maintained and updated Part I, is to incorporate Part II for operationally generated wastes and Part III for stores supplemented with valid International Ready for Recycling Certificate (IRRC).
- b. Ship is to be recycled, only in a ship recycling facility which is authorized to undertake ship recycling and has valid Document of Authorization to undertake Ship Recycling (DASR) in compliance to HKC, issued by its competent authority or its RO.
- c. Ships are required to;
 - .1 conduct operations to minimize the amount of cargo residues, remaining fuel oil, and wastes remaining on board in the period prior to entering the Ship Recycling Facility.
 - .2 arrive at the Ship Recycling Facility with cargo tanks and pump room(s) in a condition that is ready for certification as Safe-for-entry, or Safe-for-hot work, or both, in the case of a tanker;
 - .3 provide to the Ship Recycling Facility all available information relating to the ship for the development of the Ship Recycling Plan
- d. Ships will be subject to Final survey and certification by flag administration or its RO.

8. Compliance Timeline for Ship Recycling Facilities (SRF):

The ship recycling company is responsible for compliance to HKC. The ship recycling facility is required to comply with HKC latest by 26th June 2025.

9. Compliance Requirements for Ship Recycling Facilities (SRF):

In order to be an authorized Ship Recycling Facility, each SRF will be required;

- i. to be designed, constructed, and operated in a safe and environmentally sound manner in accordance with the Convention.
- ii. to have a Ship Recycling Facility Plan (SRFP)
- iii. to establish management systems, procedures and techniques which do not pose health risks to the workers concerned or to the population in the vicinity of the Ship Recycling Facility and which will prevent, reduce, minimize and to the extent practicable eliminate adverse effects on the environment caused by Ship Recycling.
- iv. to be authorised by their competent authority and hold a valid Document of Authorisation to conduct ship recycling (DASR).

Further, all Ship Recycling Facility will be required to only accept ships;

- that has valid IRRC; and
- which they are authorized to recycle;

10. Way Ahead for Ship Builder, Ship Owners and Ship Recycling Companies

i. Ship Builders

Ship builders who are currently under any stage of ship building such as contract, planning or delivery, which may fall within the HKC compliance, we recommend to initiate the preparation of IHM as early as possible.

ii. Shipowners

Owner who intends to build a new ship, is recommended to request the ship builder for compliance to HKC ensuring that ship is in possession of Part I of IHM and valid ICIHM at the time of delivery.

Owners of existing ships, which currently do not hold valid compliance to HKC are recommended to initiate development of Part I IHM and undertake Initial IHM Survey and Certification. Considering the large number of existing ships requiring HKC compliance, we recommend shipowners to commence as early as possible. Owners/managers may take assistance from IRS/Flag approved service supplier for the initial development of Part I IHM who are certified to undertake onboard sampling and report preparation.

iii. Ship Recycling Facilities

Those Ship Recycling Facilities which are located in a country which has ratified HKC are required to comply with HKC. Achieving compliance to HKC for ship recycling facility is an activity, which needs SRF to ensure that any of its existing procedures deviating with HKC needs to be brought in line with HKC. This has to be further confirmed with site inspection and auditing by its competent authority. Considering this it may take some time for SRF's to establish compliance to HKC and hence we recommend immediate action from SRF towards HKC compliance.

Ship builders, Ship Owners/ Managers and Ship Recycling Companies are advised to take note of above. Service suppliers who intend to seek approval as IRS approved service supplier for development of Inventory of Hazardous Materials may apply for approval. For any further information on compliance or any guidance, please feel free to contact us.

Enclosure:

1. Nil.

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