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Page : 3 (Three)

To,

OWNERS/MANAGERS, DEPUTY COMMISSIONERS (DCS),
COMPANY SECURITY OFFICERS (CSOS), MASTERS,
RECOGNIZED ORGANIZATIONS (ROS), PORT STATE CONTROL AUTHORITIES (PSCS).

SUBJET: INVENTORY OF HAZARDOUS MATERIALS (IHM) FOR SHIPS CALLING AT EU PORTS.

REFERENCE: **HONG KONG INTERNATIONAL CONVENTION FOR THE SAFE AND ENVIRONMENTALLY SOUND RECYCLING OF SHIPS, 2009 – THE HONG KONG CONVENTION;**
RESOLUTION MEPC.269(68) - 2015, GUIDELINES FOR THE DEVELOPMENT OF THE INVENTORY OF HAZARDOUS MATERIALS;
REGULATION (EU) NO 1257/2013 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL ON SHIP RECYCLING- EU SHIP RECYCLING REGULATION;
RESOLUTION MEPC.222(64) – 2012 GUIDELINES FOR THE SURVEY AND CERTIFICATION OF SHIPS UNDER THE HONG KONG CONVENTION;
EMSA GUIDANCE ON THE INVENTORY OF HAZARDOUS MATERIALS.

1. Purpose

The Purpose of this Circular is to inform all interested parties for the implementation of Regulation (EU) No.1257/2013 on Ship Recycling (EU SRR) to ships calling at a port or anchorage of any country of the European Union (EU), on or after 1 January 2021, and provide relevant instructions on issuing a Statement of Compliance (SoC) for an Inventory of Hazardous Materials (IHM).

2. Background

- The Hong Kong Convention (HKC) was adopted in 2009 to effectively address, the environmental, occupational health and safety risks related to ship recycling. Upon entry into force, the HKC will require new ships and existing ships of 500 GT and above, to have on board a valid International Certificate of Compliance on IHM which documents ship-specific information on the actual hazardous materials present on board in order to protect health and safety of the crew, and to protect health and safety of works at ship recycling facilities and avoid environmental pollution when the ship is going for recycling.

- The European Parliament formally adopted the EU SRR on October 22nd 2013. The EU SRR entered into force on December 30th 2013. The EU SRR requires all non-EU-flagged ships of 500 GT and above calling at EU ports; from December 31st 2020, to have on board a valid IHM with a SoC.
- Ship-owners with ships calling at ports in the EU, as of January 1st 2021, have to develop an IHM in order to meet the requirements of the EU SRR and there should be a reference in the SoC stating that the IHM has been developed to cover also the requirements of the EU SRR.

3. Definitions

- 'Hazardous Material' means any material or substance which is liable to create hazards to human health and/or the environment.
- 'Ship' means a vessel of any type whatsoever operating or having operated in the marine environment, and includes submersibles, floating craft, floating platforms, self-elevating platforms, Floating Storage Units (FSUs), and Floating Production Storage and Offloading Units (FPSOs), as well as a vessel stripped of equipment or being towed.
- 'New ships' means ships whose building contract, keel laid, or delivery is placed on or after the date of effective application, as per Article 3(2) of EU SRR.

4. Application

- This Circular applies to new and existing ships of 500 GT or more registered under this Administration as of January 1st 2021.
- The IHM should be ship specific and developed in accordance with MEPC.269(68) and EUSR and should be verified by a Recognized Organization (RO) as per the requirements of relevant resolutions and regulations, prior the issuance of the SoC on behalf of this Administration.
- The official language of the IHM and SoC must be English.
- New ships shall comply with the requirements of the EU SRR at the design and construction stage. Shipbuilders are responsible to collect the Materials Declaration and Supplier's Declaration of Conformity from the suppliers, as per Appendix 3 of MEPC.269(68).
- Existing ships shall comply, as far as practicable, with the requirement to have an IHM on board as of January 1st 2021 (reference: Article 32.2(b) of EU SRR). It shall identify, at least, the hazardous materials listed in Annex I of the EU SRR.
- The EU SRR does not establish a period of validity for the SoC, unless so specified by the flag State. This Administration, after taking into consideration the European Maritime Safety Agency's (EMSA) Guidelines covering port State Control, has determined that the five years limit is also appropriate for a SoC issued under the EU SRR. This means that separate initial, renewal and additional surveys should be conducted for Comorian Flagged vessels under the EU SRR.
- A SoC should be modelled on the format provided in Annex 3 of the EMSA document, Guidance on inspection of ships by the port state in accordance with Regulation (EU) 1257/2013 on ship recycling, inspections from the EU port States to enforce provisions of the ship recycling Regulation, of September 27th 2019.

5. IHM Verification & Certification

Recognized Organizations authorized to carry out the verification of IHM and issue the Statement(s) of Compliance are:

1. Bulgarian Register of Shipping
2. China Classification Society
3. Dromon Bureau of Shipping
4. International Naval Surveys Bureau
5. Korean Register of Shipping
6. Lloyd's Register
7. Panama Maritime Documentation Services
8. Phoenix Register of Shipping
9. Polish Register of Shipping
10. Russian Maritime Register of Shipping
11. Veritas Register of Shipping

6. Contact

Should you require any additional information, you may contact our Technical Department as provided below:

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We take this opportunity to reassure that human life, marine environment and property are always considered as a priority for the Maritime Administration of Comoros which is committed to the safety of the maritime industry and the users around the world.

