



TECHNICAL INFORMATION

36 Myeongji ocean city 9-ro,
Gangseo-gu, Busan, 618-814
Republic of Korea

Phone : +82-70-8799-8336
Fax : +82-70-8799-8319
E-mail : songwb@krs.co.kr
Person in charge : Song Woobeen

No : 2023-IMO-03
Date : 2023.09.18

Subject: Considerations for Compliance with the Hong Kong Convention (HKC) (Entering into force on June 26, 2025)

The Hong Kong Convention (HKC) is an international convention developed to ensure the safety and health of workers from hazardous materials when dismantling ships, and to prevent environmental pollution that may arise from ship recycling. Additionally, this convention requires all applicable ships to develop and to have an inventory of hazardous materials on board. It also mandates recycling facilities to adhere to specific standards and procedures. For this convention to entry into force, three conditions must be met.

1. Not less than 15 contracting States.
2. Not less than 40% of the world's merchant shipping by gross tonnage.
3. The combined maximum annual ship recycling volume of the signed States during the preceding 10 years constitutes not less than 3% of the gross tonnage of the combined merchant shipping tonnage.

On June 26, 2023, Bangladesh and Liberia ratified the Hong Kong Convention. With their ratification, the criteria for the Convention's entry into force were met, which is scheduled for June 26, 2025. In relation to this, please note the measures and details provided to comply with the relevant regulations.

1. General & Application

1) Application

- All ships¹⁾ of 500GT and above, engaged in international voyages.
- Ship Recycling Facilities operating under the jurisdiction of a Party²⁾

1) Exception: Any warships, naval auxiliary, or other ships owned or operated by a Party and only on government non-commercial service

2) Party: Refer to a country or state that has signed and ratified a treaty or agreement

2) Date of application

The application dates after June 26, 2025, are divided as follows.

(1) New ship

- New ship means a ship:

- for which building contract is placed on or after the entry into force of the Convention (on or after June 26, 2025); or
- in the absence of a building contract, the keel of which is laid or which is at as similar stage of construction on or after six months after the entry into force of the Convention (on or after December 26, 2025); or
- the delivery of which is on or after 30 months after the entry into force of the Convention (on or after December 26, 2027).

- At the time of ship delivery, the approved Inventory of Hazardous Materials (IHM) Part I and the IHM certificate³⁾ shall be on board the vessel.

(2) Existing ship

- A ship which is not a new ship

- No later than June 25, 2030 or before the ship is recycled, if this is earlier, the approved Inventory of Hazardous Materials (IHM) Part I and the IHM Certificate (or SOC) shall be on board the vessel.

2. Maintenance/update of IHM Part I

1) General

- The shipowner shall be update and manage the IHM Part I whenever new machinery, equipment, or components are added, removed, replaced or the hull coating is renewed. For this purpose, shipowner or manager shall establish the IHM maintenance procedure including the designation of a person as responsible for maintaining and updating the IHM part I.

- Unless the identical parts or coatings were installed or applied, Material Declaration and Supplier's Declaration of Conformity of any new installation provided by the suppliers are to be retained on board.

³⁾ If ships are registered under Flags that have ratified the HKC, they shall obtain a full-term international certificate on IHM. If ships are registered under Flags that have not ratified the HKC, an IHM Statement of Compliance shall be issued.

※ For ships under the Liberian flag, a full-term international certificate on IHM shall be issued before June 26, 2025. The IHM certificate will be issued in a consolidated format that includes the provisions of EU Reg. No.1257/2013. (Refer to Liberia's flag state guidance MARINE OPERATIONS NOTE 06/2023)

2) Adoption of 2023 Guideline for the development of the Inventory of Hazardous Materials

(1) In the revisions to the IAFS (International Convention on the Control of Harmful Anti-fouling Systems on Ships), regulations regarding organotin compounds have been updated to include regulations on Cybutryne. These changes enter into force on January 1, 2023. As a result, the revised 2023 guidelines (Res.MEPC.379(80)) were adopted at the 80th MEPC meeting. The Inventory of Hazardous Materials shall be managed and updated considering the revised guidelines.

*Key features: Inclusion of Cybutryne in the Inventory of Hazardous Materials.

(2) The shipowner (or IHM service supplier⁴⁾) shall verify the presence or absence of Cybutryne exceeding the threshold value of 1000mg/kg in the hull, external parts, and the outer coating layer through supporting documents⁵⁾ or through sampling.

3. Issuance of IHM certificate or SOC on a case-by-case basis

1) New ship

(1) For new ships, the Inventory of Hazardous Materials(IHM) Part I is prepared by the shipbuilder.

The shipowner shall prepare the approved IHM Part I and, following an initial survey by the competent authority or RO (Recognized Organization), obtain the IHM certificate (or SOC).

(2) The shipbuilder shall collect and prepare Material Declaration and Supplier's Declaration of Conformity from the manufacturers in accordance with the 2023 Guideline for the development of the Inventory of Hazardous Materials (Res.MEPC.379(80)) during the design and construction of the ship. At this time, it is imperative to verify whether the Material Declaration includes Cybutryne at or above the threshold value of 1000mg/kg.

2) Existing ship (ships that do not have an IHM SOC on board)

(1) Before June 25, 2030, the shipowner shall prepare the approved IHM Part I, and IHM certificate shall be issued through an initial survey by competent authority or RO (Recognized Organization).

(2) The IHM Part I for existing ships shall be prepared by an IHM service supplier registered with this Society. A list of IHM Service Suppliers approved by this Society is available on our website and can also be accessed through the following link

http://e-mesis.krs.co.kr/KeyService/Supplier/En/WKS_CorpAddress_List.aspx

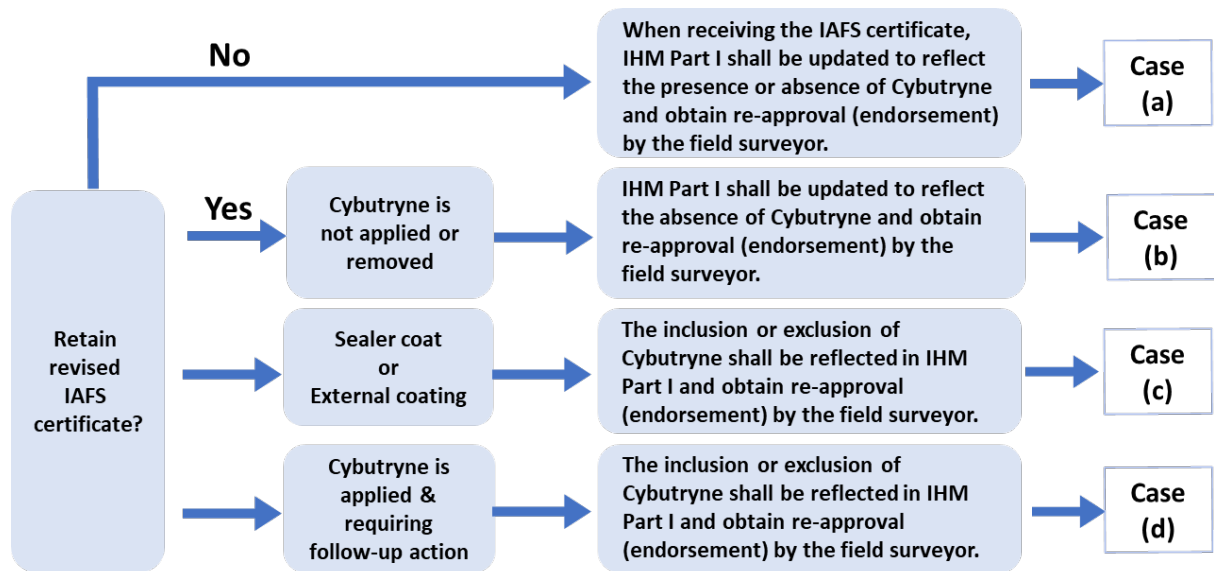
⁴⁾ IHM Part I shall be developed by an IHM service supplier registered with this Society. However, for ships flagged under Liberia, Marshall Islands, IHM Part I shall be developed by IHM expert companies approved by their flag administration.

⁵⁾ Documents: Declaration of Compliance for Cybutryne or equivalent or higher data of antifouling system

3) Existing ship (ships that have an IHM SOC on board)

(1) If ships are registered under Flags that have ratified the HKC, they must obtain a full-term international certificate. If ships are registered under Flags that have not ratified the HKC, the SOC status should be maintained.

(2) The Issued IHM Statement of Compliance (SOC) shall be converted to an IHM certificate. It is recommended to complete this conversion at the first periodical survey for cargo ship safety construction certificate after June 26, 2025.



< Flow chart of IAFS certificate >

(a) Ships without IAFS certificate in the revised format.

- The amendment to the IAFS convention (International Convention on the Control of Harmful Anti-fouling Systems on Ships) prohibiting the use of Cybutryne in antifouling paint enter into force on January, 1, 2023. Reflecting this change, certificates are being reissued in the revised format at the nearest occasional or periodical survey. When receiving the IAFS certificate, the shipowner shall update IHM Part I to reflect the presence or absence of Cybutryne and obtain re-approval (endorsement) by the field surveyor.

(b) Ships where Cybutryne is not applied to the antifouling system or Cybutryne has been removed.

- Based on supporting documents or sampling results, the shipowner shall update the IHM Part I to reflect that Cybutryne has not been applied. This shall be re-approved (endorsed) by the field surveyor at the nearest occasional or periodical survey.

(c) Ships where Cybutryne has been applied to the antifouling system and covered with a sealer coat or external coating

- The shipowner shall reflect the inclusion of Cybutryne in IHM Part I and shall obtain re-approval (endorsement) from the field surveyor at the nearest occasional or periodical survey.
- If Cybutryne has been removed, the shipowner shall update IHM Part I to reflect this change and then obtain re-approval (endorsement) by the field surveyor.

(d) Ships where Cybutryne has been applied and which require subsequent actions

- The shipowner shall reflect the inclusion of Cybutryne in IHM Part I and shall obtain re-approval (endorsement) by the field surveyor at the nearest occasional or periodical survey.
- If Cybutryne has been removed, the shipowner shall update IHM Part I to reflect this change and then obtain re-approval (endorsement) by the field surveyor.

4) EU flagged ships and third-country ships calling at/ anchoring in EU ports.

Even after June 26, 2025, EU member state-flagged ships and third-country ships calling at/anchoring in EU ports shall maintain their IHM(EU) certificate of SOC unless there are specific guidelines from their flag state.

4. IHM final survey

This refers to the survey carried out before a ship is recycled. Before the final survey, the shipowner shall have the approved Inventory of Hazardous Materials (IHM) (Part I, II and III ⁶⁾) and the approved Ship Recycling Plan⁷⁾. If the shipowner decides to decommission an operational ship, a Ready for Ship Recycling Certificate shall be obtained before dismantling the ship. For this purpose, the shipowner shall apply for IHM final survey to this Society. The validity of the Ready for Ship Recycling Certificate is three months, so the ship shall be sent to the ship recycling facility within this period. A shipowner or IHM service supplier shall develop the Inventory of Hazardous Materials Part II and Part III taking into account the quantity of the operationally generated wastes and stores by a planned or expected operation before the arrival at the Ship Recycling Facility. The ship shall only be recycled at a Ship Recycling Facility authorized by the Competent Authority or the Recognized Organization (RO).

⁶⁾ IHM Part I: Materials contained in ship structure or equipment

IHM Part II: Operationally generated wastes

IHM Part III: Stores

⁷⁾ Ship Recycling Plan: The Ship Recycling Plan shall be developed by the ship recycling facility, and approval from the competent authority of the country where the facility is located is required.

5. Recommendations

After the new construction, there are many cases where sampling is necessary to verify hazardous materials due to the absence of Material Declarations and Supplier's Declaration of Conformity for the creation of Inventory of hazardous materials (IHM) Part I. This process can be time-consuming and costly. Therefore, **it is recommended to collect Material Declarations and Supplier's Declaration of Conformity during the new construction phase for the preparation of the Inventory of hazardous materials (IHM) Part I.**

If you have any inquires, please contact to below.

Convention & Legislation Service Team (convention@krs.co.kr): General inquiries

Statutory Service team(statutory@krs.co.kr): Inquires regarding Korean flagged ships

Environment & piping team(piping@krs.co.kr): Inquiries related to the approval of drawings for IHM Part I, II, and III.

Distributions: KR surveyors, Ship owners, Manufacturers, Other relevant parties

Disclaimer :

Although all possible efforts have been made to ensure correctness and completeness of the contents contained in this information service, the Korean Register is not responsible for any errors or omissions made herein, nor held liable for any actions taken by any party as a result of information retrieved from this information service.