



**Subject : Guidance on the issuance of IHM(EU) certificate for existing ships,  
maintenance/update of IHM Part I and Final Survey**

In accordance with EU Ship Recycling Regulation (hereinafter referred to as "EU SRR"), EU flagged ships and non-EU flagged ships entering port or anchorage of an EU member state shall have IHM Part I and IHM(EU) certificate (or SoC) on board as follows:

IHM	EU SRR		
	EU flagged ships		Non-EU flagged ships entering EU port or anchorage
	New ships <sup>1)</sup>	Existing ships <sup>2)</sup>	
Application Date	31 Dec. 2018	31 Dec. 2020	31 Dec. 2020
Certificate	IHM(EU) Certificate		IHM(EU) SoC

In this regard, please be informed of the details on the procedure for issuing IHM(EU) certificate (or SoC) for different cases, the maintenance/update procedure of IHM Part I, and IHM Final Survey as follows:

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*1) New Ship: A ship*

- for which building contract is placed on or after the entry into force of the Convention; 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; or
- the delivery of which is on or after 30 months after the entry into force of the Convention.

*2) Existing Ship: a ship which is not a new ship*

*3) Ship Recycling Convention: Hong Kong International Convention for the safe and environmentally sound recycling of ships adopted in 2009 (hereinafter referred to as "the Convention")*

## I. Procedure for issuing IHM(EU) certificate (or SoC) for different cases

### 1. Ships without IHM Part I and SoC on board under the Convention

IHM Part I for existing ships shall be developed by IHM Service Suppliers<sup>4)</sup> which are registered to this Society. The IHM Part I shall be approved by this Society and IHM(EU) certificate (or SoC) under EU SRR will be issued by KR field Surveyor upon completion of IHM Initial Survey.

The detailed procedure for issuing IHM(EU) certificate (or SoC) is as follows:

STEP 1	Collection of information and Preparation of Visual/Sampling Check Plan	Service Supplier
STEP 2	Onboard Visual/Sampling Check	Service Supplier
STEP 3	Development of IHM Part I and Submission to KR	Service Supplier
STEP 4	Approval of IHM Part I	KR Environment & Piping Team
STEP 5	Initial Survey and Issuance of Certificate (or SoC)	KR Field Surveyor

A list of IHM Service Suppliers approved by this Society can be found in our website and can be accessed through the following link as well.

[http://e-mesis.krs.co.kr/KeyService/Supplier/En/WKS\\_CorpAddress\\_List.aspx](http://e-mesis.krs.co.kr/KeyService/Supplier/En/WKS_CorpAddress_List.aspx)

### 2. EU flagged existing ships carrying approved IHM Part I and SoC on board under the Convention

EU flagged existing ships shall have IHM Part I and IHM(EU) certificate on board which meets the requirements of EU SRR on or after 31<sup>st</sup> December 2020.

Hence, onboard visual/sampling check for PFOS<sup>5)</sup> & HBCDD<sup>6)</sup> shall be carried out by IHM Service Supplier. In case there is no maintenance/update record of IHM Part I for new installation items, on board visual/sampling check for them shall be carried out as well.

The investigation report shall be submitted to this Society for review, and if any hazardous material is identified as a result of the onboard visual/sampling check, IHM Part I shall be updated and submitted to this Society for approval.

Upon approval, IHM(EU) certificate will be issued by KR Field Surveyor through IHM Initial Survey and the expiry date of IHM(EU) certificate will be made to coincide with that of IHM SoC which is kept on board.

<sup>4)</sup> In case of the Liberian flagged ships, IHM Part I shall be developed by IHM expert companies which are accepted by the Liberian Administration

<sup>5)</sup> PFOS: Perfluorooctane sulfonic acid

<sup>6)</sup> HBCDD: Brominated Flame Retardant (For existing ships, it shall be applied as far as practicable.)

### **3. Non-EU flagged ships carrying IHM Part I and SoC on board under the Convention**

Non-EU flagged ships entering port or anchorage of an EU member state shall have IHM(EU) SoC on board under EU SRR on or after 31<sup>st</sup> December 2020. Once the application for the issuance of IHM(EU) SoC is submitted to the nearest KR branch office, IHM(EU) SoC can be issued without an additional survey on board.

### **4. Ships carrying only Green Passport Certificate on board**

Green Passport is initiated by Res.A.962(23) "IMO Guidelines on Ship Recycling" and this guideline has been made obsolete. Therefore, IHM Part I shall be approved by this Society in accordance with the procedure as set out in the above Sec. **I.1** and upon approval, IHM(EU) certificate (or SoC) will be issued by KR Field Surveyor after IHM Initial Survey.

### **5. Ships applying to be registered under the flag of an EU member state**

Where non-EU flagged ships apply to be registered under the flag of an EU member state, IHM Part I which meets the EU SRR shall be established, approved and kept on board within six months of the registration under the flag of that EU member state or during any of the next Renewal Survey, whichever comes first. Therefore, the procedure which is applicable to the ship is to be followed, taking into account the above Sec. **I.1 ~ I.4**.

## **II. Maintenance/update of IHM Part I**

### **1. General**

It is shipowner's responsibility to keep the IHM Part I up-to-date. Therefore, IHM Part I shall be properly maintained and updated whenever any machinery or equipment or component is added to, removed or 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 (hereinafter referred to as "MD") and Supplier's Declaration of Conformity (hereinafter referred to as "SDoC") of any new installation provided by the suppliers are to be appropriately retained on board. If any newly installed item contains hazardous materials, IHM Part I shall be updated and submitted to this Society for approval.

As the compulsory compliance date of EU SRR for existing ships is approaches, many shipowners are entrusting the maintenance/update of IHM Part I to an IHM service supplier through a contract. For the convenience of shipowners or managers who want to do this by themselves, a sample format of IHM maintenance/update sheet and standard format of MD & SDoC are attached herewith as an appendix.

## 2. Additional requirement(s) on EU flagged ships

When collecting MD of any newly installed items on EU flagged ships, it shall be confirmed as to whether PFOS and HBCDD are included in the MD.

Please be informed that any new installation or use of an item containing PFOS by more than 10 mg/kg (0.001% by weight) shall be prohibited. If any newly installed item contains HBCDD by more than 100 mg/kg (0.01% by weight), IHM Part I shall be updated and submitted to this Society for approval.

## 3. Additional requirement(s) on non-EU flagged ships entering port or anchorage of an EU member state

When collecting MD of new installation on non-EU flagged ships entering port or anchorage of an EU member state, it shall be confirmed as to whether HBCDD is included in the MD. If any newly installed item contains HBCDD by more than 100 mg/kg (0.01% by weight), IHM Part I shall be updated and submitted to this Society for approval.

## III. IHM Final Survey

### 1. Procedure for issuance of the ready for ship recycling certificate (hereinafter referred to as "IRRC") on EU flagged ships

EU flagged ships shall be recycled only at the facilities listed in the "European List of the ship recycling facilities (EU List)" and the listed facilities can be found through the below link.  
<http://ec.europa.eu/environment/waste/ships/>

If a shipowner decides to send their ship to a ship recycling facility, the ship shall have IRRC on board before ship recycling. For this purpose, the shipowner shall apply for IHM Final Survey to this Society. The detailed procedure for getting IRRC by this Society is as follows:

STEP 1	Preparation and Submission of incorporated IHM (Part I, II and III) <sup>7)</sup>	Shipowner or Service Supplier
STEP 2	Approval of the incorporated IHM (Part I, II and III)	KR Environment & Piping Team
STEP 3	Submission of the incorporated IHM and ship's information to the intended Ship Recycling Facility	Shipowner or Service Supplier
STEP 4	Preparation of Ship Recycling Plan and submission of it to the Competent Authority	Ship Recycling Facility
STEP 5	Approval of Ship Recycling Plan	Competent Authority
STEP 6	IHM Final Survey and Issuance of IRRC (Maximum valid date : 3 month)	KR Field Surveyor
STEP 7	Ship Recycling within the valid period	Shipowner and Ship Recycling Facility

A shipowner or an IHM service supplier shall develop IHM Part II & 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 ready for ship recycling certificate will be issued by KR Field Surveyor upon completion of IHM Final Survey if the following requirements are met:

- 1) approximate quantities & locations of hazardous materials listed in the incorporated IHM (Part I, II and III) are consistent with ship's actual arrangements;
- 2) approved ship recycling plan is kept on board; and
- 3) intended ship recycling facility is listed in the EU List.

A sample format of IHM Part II & III is attached herewith as Appendix 3 for your reference when developing IHM Part II & III.

## 2. Non-EU Ships

Ships flying the flag of a third country shall be recycled only at the facilities accredited by the Competent Authority or the recognized organization (RO) in accordance with the Convention.

For reference, the requirement for ship recycling facility and the ready for ship recycling certificate under Sec-III.1 are not required until the Convention enters into force. However, you are recommended to contact the ship recycling facility to obtain specific instructions considering that the ship recycling facility where the ship dismantling work is being carried out and the party where the facility is located may have their own regulations to be complied with.

## IV. Ratification status of Ship Recycling Convention

Ship Recycling Convention shall enter into force 24 months after the date on which the following conditions are met:

- 1) not less than 15 States have either signed it; and
- 2) the combined merchant fleets of the signed States constitutes not less than 40 percent of the gross tonnage of the world's merchant shipping; and
- 3) the combined maximum annual ship recycling volume of the signed States during the preceding 10 years constitutes not less than 3 per cent of the gross tonnage of the combined merchant shipping of the same States.

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7) *IHM Part I: Materials contained in ship structure or equipment*  
*IHM Part II: Operationally generated wastes*  
*IHM Part III: Stores*

At the moment, 15 countries have ratified the Convention, and the total fleet's gross tonnage of those countries is about 29.6% of the world's merchant shipping.

As the share of the top 5 ship recycling countries (Bangladesh, China, India, Pakistan and Turkey) accounts for about 98% of global ship recycling, ratification by those countries is essential for the entry into force of the Convention. At the moment, as India and Turkey have ratified the Convention, the third requirement is met even if only one of the three remaining countries ratifies the Convention.

Due to the absence of MD & SDoC on existing ships, it is inevitable to take samples for identifying hazardous materials contained in the structure, equipment of the ship in order to prepare IHM Part I. This makes it more expensive and time-consuming to prepare IHM Part I than new ships.

In conclusion, it is recommended that the IHM Part I be prepared in advance at the new shipbuilding stage, considering that the entry into force of the Convention is very close.

**Executive Vice President**

**Technical Division** 

Distributions : KR Surveyors, Shipowners, Other relevant parties

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