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**No: 2024-IMO-02**

**Date : Feb 20, 2024**

**Subject: Considerations for compliance with UAE Ship Recycling Regulation**

Recently, the United Arab Emirates (UAE) has issued guidelines regarding the UAE Ship Recycling Regulations (UAE SRR). The UAE SRR imposes stricter requirements than the EU Ship Recycling Regulation (EU SRR) by prohibiting not only the beaching1) but also the landing2) method.

Furthermore, it prohibits changing the flag of a vessel with the intention of disposing of it in facilities that do not meet the regulations. For detailed information, please refer to the attached FMA Circ.No.19 of 2023.

According to these guidelines, all foreign new ships of 500 GT and above calling at UAE ports, as well as UAE-flagged new ships, shall have an Inventory of Hazardous Materials (IHM) on board the ship after June 26, 2025. All foreign existing ships of 500 GT and above calling at UAE ports, as well as UAE-flagged existing ships are required to have the IHM on board the ship after June 26, 2030.

**1. Application**

1) Ship recycling facilities operating in the UAE.

2) UAE flagged ships.

3) Foreign ships recycled in the UAE

4) Foreign ships where the decision to recycle the ship was made when the vessel was in UAE waters.

5) Foreign ships that have commenced the final voyage for recycling directly from UAE waters, with or without any technical stops in between while enroute to the recycling facility or have stopped at a UAE port or anchorage while on their way to the recycling facility.

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1) beaching: Grounding the ship in shallow coastal waters, then pulling it ashore to enable workers to access and dismantle the vessel

2) landing: Dismantling is done by lifting a part of the ship onto land, using either a mobile crane on land or one on a barge

6) This regulation shall not apply to:

(1) Any ship with a gross tonnage of less than 500 tons.

(2) Any warship or ships owned or operated by the State.

**2.Inventory of Hazardous Materials**

1) New ships

- New ships under the UAE flag and foreign-flagged new ships arriving in the UAE are required to identify all hazardous materials as referred to in Annex II of the UAE Ship Recycling Regulations. This includes documenting the inventory of hazardous materials present in the structure or equipment of the ship, along with their location and approximate quantities, during the design and construction phases. Furthermore, upon delivery, the vessel shall have on board the approved Inventory of Hazardous Materials (IHM) Part I and IHM Certificate (or Statement of Compliance). A “New ship” refers to the following ships, and the Inventory of Hazardous Materials (IHM) Part I shall be prepared during the design and construction phases.

“New ship” means a ship:

(1) for which a construction contract was concluded on or after 26 June 2025, or

(2) in the absence of a construction contract, where the keel is laid or the ship is at a similar stage of construction, on or after 26 June 2025, or

(3) that is delivered after 26 December 2027.

2) Existing ships

Existing UAE flagged ships, excluding the aforementioned new ships, as well as foreign-flagged existing ships arriving in the UAE, shall have the approved Inventory of Hazardous Materials (IHM) Part I and IHM Certificate (or Statement of Compliance) on board the ship by 26 June 2030 or before recycling.

**3. The main differences between UAE SRR, EU SRR and the Hong Kong Convention (HKC).**

1) The requirements of the EU Ship Recycling Regulation (EU SRR) regarding the development of an Inventory of Hazardous Materials (IHM) are largely based on the Hong Kong Convention. The IHM prepared in accordance with the EU SRR is structured following the format specified in the IMO guidelines (MEPC.Res.379(80)).

However, the IHM developed under the EU SRR includes two additional substances mandated for management by the regulation: PFOS and HBCDD.

2) The UAE Ship Recycling Regulations, similar to the EU Ship Recycling Regulation, also require the addition of PFOS and HBCDD to the Inventory of Hazardous Materials, necessitating their inclusion in the inventory's development, maintenance, and updates. Please refer to the table below for applicable timelines and differences.

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| **IHM** | **EU SRR** | | | **HKC** | | **UAE SRR** | |
| **EU Ships** | | **Non EU**  **Ship** | **New ships** | **Existing ships** | **UAE Flagged ships, Foreign Flagged ships** | |
| **New ships** | **Existing ships** | **New ships** | **Existing ships** |
| **Date of application** | **2018. 12.31** | **2020.**  **12.31** | **2020. 12.31** | **2025. 6.26** | **2030. 6.26** | **2025. 6.26** | **2030. 6.26** |
| PFOS1) | ○ | ○ | N/A | N/A | | ○ | ○ |
| HBCDD2) | ○ | N/A | N/A\* | N/A | | ○ | N/A\* |

*\* After the initial development of IHM Part I, it is necessary to maintain and update IHM Part I to reflect any new installations of equipment containing HBCDD or any changes to the vessel.*

*1) PFOS: Perfluorooctane sulfonic acid*

*2) HBCDD: Brominated Flame Retardant*

**4. Ships without an IHM Part I and Certificate (or Statement of Compliance) in accordance with the Hong Kong Convention on board.**

1) New ships

(1) The Inventory of Hazardous Materials (IHM) Part I for new ships shall be prepared by the shipyard, and the shipyard shall prepare an approved IHM Part I and shipowners obtain an IHM Certificate (or Statement of Compliance) after the initial survey conducted by the competent authority or Recognized Organization (RO).

(2) During the design and construction of the vessel, shipyards are required to collect MD(Materials Declaration) and SDoC(Supplier’s Declaration of Conformity) from manufacturers in accordance with the 2023 Guidelines (Res.MEPC.379(80)). It is crucial to note that for ships calling at UAE ports, the UAE Ship Recycling Regulations require the addition of PFOS and HBCDD to the Inventory of Hazardous Materials, similar to the EU SRR. Therefore, when collecting MD and SDoC from manufacturers, it is imperative to verify whether PFOS and HBCDD are included.

2) Existing ships

The Inventory of Hazardous Materials (IHM) Part I for existing vessels shall be prepared by an IHM specialist supplier3) registered with our classification society. Approval shall be obtained from our classification society, and the vessel shall undergo initial survey to receive the IHM Certificate (or Statement of Compliance) in accordance with the Ship Recycling Convention. The detailed procedure for certificate issuance is as follows:

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| **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>

**5. In the event that foreign-flagged vessels of 500 GT and above, holding IHM (EU) SOC, call at UAE ports, the following procedures apply:**

1) For EU-flagged vessels, as they already reflect PFOS and HBCDD materials in IHM Part I in accordance with the EU Ship Recycling Regulation (EU SRR) and possess IHM Statements of Compliance in accordance with the Ship Recycling Convention, no further action is required.

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3) IHM Part I shall be prepared by an IHM specialist supplier registered with our classification society. However, for vessels registered under the flag of Liberia or the Marshall Islands, the IHM Part I shall be prepared by a specialist company approved directly by the flag state.

2) For non-EU-flagged vessels, if PFOS an HBCDD are not included in IHM Part I, an onboard visual/sampling check for PFOS and HBCDD shall be conducted by an approved IHM Service Supplier. If hazardous materials are identified during the visual/sampling check, IHM Part I shall be updated accordingly, and then obtain re-approval (endorsement) by the field surveyor by June 26, 2030.

**6. If a vessel, holding an IHM certificate (or Statement of Compliance) according to the Ship Recycling Convention but not holding an IHM (EU) SOC according to the EU regulation, calls at a port in the UAE.**

If PFOS an HBCDD are not included in IHM Part I, an onboard visual/sampling check for PFOS and HBCDD shall be conducted by an approved IHM Service Supplier. If hazardous materials are identified during the visual/sampling check, IHM Part I shall be updated accordingly, and then obtain re-approval (endorsement) by the field surveyor by June 26, 2030.

**7. Maintenance and Updating of Inventory of Hazardous Materials (IHM) Part I**

1) General Provisions

(1) Shipowners shall ensure that the Inventory of Hazardous Materials (IHM) Part I is maintained and updated when machinery, equipment, or components are newly added, or when the ship undergoes repairs or modifications. Shipowners or management companies shall establish procedures and designate responsible personnel for this purpose.

(2) Prior to the issuance of the certificate, whether interim or regular, and unless the same component or coating is installed or applied, material declarations (MD) and supplier declarations of conformity (SDoC) for all new installation items shall be collected from manufacturers and kept on board the vessel.

2) Additional Requirements for UAE-flagged vessels and Foreign-flagged vessels calling at UAE ports

When collecting material declarations of any newly installed items on UAE-flagged vessels or foreign-flagged vessels calling at UAE ports, it is essential to verify whether PFOS and HBCDD are included in the material declarations. The installation and use of items containing PFOS by more than 10 mg/kg (0.001% by weight) shall be prohibited.

If any newly installed items contain HBCDD by more than 100 mg/kg (0.01% by weight) shall be reflected in the Inventory of Hazardous Materials (IHM) Part I, and the IHM shall be updated and submitted to our classification society for approval.

**8. General Requirements for Shipowners**

1) UAE-flagged vessels intended for recycling shall be recycled at approved ship recycling facilities equipped with a Dry Dock or equivalent infrastructure, and shall not undergo beaching or landing operations, ensuring the use of impermeable flooring materials.

2) If a vessel is scheduled for recycling at a ship recycling facility, the shipowner shall notify the relevant authority within 15 days, providing the Inventory of Hazardous Materials and all relevant ship-related information.

3) Ship owners unable to obtain a slot at a compliant ship recycling yard shall have the option of approaching the administration for transferring the ownership title to a UAE entity, which shall guarantee compliance with this regulation.

4) Shipowners of vessels flagged under the UAE jurisdiction are prohibited from changing the flag state for the purpose of recycling the vessel in facilities that do not comply with regulations.

This technical information provided is based on the UAE SRR guidelines (FMA Circular No.19 of 2023); however, as the specific application is not explicitly mentioned, additional information received via email from the relevant authority has been included. UAE SRR represents UAE's own regulatory guidelines, so for precise details, it is advised to directly contact the relevant authority. We hereby notify in advance that we do not assume any legal responsibility for the information provided in this technical information.

If you have any inquiries, 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](mailto: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

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