

	CIRCULAR 2021-001		
	DEPARTMENT OF MARINE SERVICES AND MERCHANT SHIPPING (ADOMS)		
	Enforcement of EU ship recycling regulation no. 1257/2013 (EU SRR) relating to the inventory of hazardous materials	Ref	Circular 2020-006 Circular 2020-001 (Rev.1)

Addressees(s):

- ***Shipowners, Operators and Managers of Vessels under the Flag of Antigua and Barbuda***
- ***All Vessels registered under the Flag of Antigua and Barbuda***

1. Scope

ADOMS [Circular 2020-006](#) on our website gives details of the Inventory of Hazardous Materials (IHM) and Statement of Compliance (SoC) requirements, for third party ships visiting EU ports, from the 31 December 2020.

2. Legal Basis

- Antigua and Barbuda Merchant Shipping Act (MSA) 2006 and adhering Regulations

3. Summary / Excerpt

ADOMS wishes to draw the attention of all concerned to a Notice recently adopted by the EU Commission providing guidelines on the enforcement of obligations under the EU Ship Recycling Regulation No. 1257/2013, relating to the Inventory of Hazardous Materials (IHM).

4. ADOMS Policy

Where, due to Covid-19 restrictions, it has not been possible to conduct the IHM initial survey, agreement has been given to our Recognised Organisations (ROs) to carry out remote surveys. This is subject to the RO complying with their remote survey procedures and using their trained and fully certified exclusive RO surveyors.

This is consistent with the remote audits and survey procedures, detailed in our [Circular 2020-001 \(Rev.1\)](#) during present Covid-19 pandemic.

In addition, there are several cases where ships will not be in full compliance with the IHM and SoC requirements, by 31 December 2020.

Reference should be made to the above EU Commission Notice which is available at:

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:JOC_2020_349_R_0001

and provides guidance for a harmonized approach towards enforcement by the EU port State authorities.

Where the shipowner has started the process of IHM certification, but completion has been delayed due to Covid-19, then consideration will be given to postponement of IHM compliance, until not later than 30 June 2021.

The shipowner will first however need to provide accepted evidence, that all possible measures were taken to undertake this IHM verification.

In such cases, our RO will then issue a Statement to this effect and this document should be placed onboard, together with the other documents showing the status of the IHM certification process, for port State inspections.