

# St. Kitts and Nevis International Ship Registry

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Federation Worldwide



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## Circular Letter to Maritime Registrars, Ship Owners, Ship Operators & Recognised Organisations

Maritime Circular No. MC 99 20

DATE: 19 December 2020

### SURVEY OF VESSELS FOR THE PURPOSE OF ISSUANCE OF AN INVENTORY OF HAZARDOUS MATERIALS (IHM).

#### 1. Purpose

- 1.1. The purpose of this Maritime Circular to provide guidance on acceptable scope for the Recognised Organisation to survey St Kitts and Nevis registered vessels for the issuance of an Inventory of Hazardous Materials (IHM).
- 1.2. This circular should be read in conjunction with IMO Resolution MEPC.269(68), the Hong Kong International Convention for the Safe and Environmental Sound Recycling of Ships, 2009 and EU Ship Recycling Regulation (EU) No 1257/2013.

#### 2. Application

- 2.1. In accordance with Article 12 of the EU SRR No 1257/2013, all St Kitts and Nevis vessels calling at a European Port or Anchorage are required to possess onboard an inventory of hazardous materials in compliance with Article 5 of the same regulation, **on or after 01 January 2021.**
- 2.2. In accordance with Regulation 5.1 of the Hong Kong International Convention for the Safe and Environmental Sound Recycling of Ships, 2009, new constructed vessels shall hold onboard an inventory of hazard materials which has been verified by this Administration or a Recognised Organisation appointed by the Administration.
- 2.3. In accordance with Regulation 5.2 of the Hong Kong International Convention for the Safe and Environmental Sound Recycling of Ships, 2009, existing ships shall comply as far as practical with clause 5.1 not later than 5 years after the entry into force of Hong Kong International Convention for the Safe and Environmental Sound Recycling of Ships, 2009. **This clause is only applicable for vessels which are not calling at a European Port or designated anchorage.**

#### 3. Verification of the IHM and Certification Requirements

- 3.1. As referenced in para 2.1 of this circular, all St Kitts and Nevis ships which call into European Ports or anchorages must be in possession of a Statement of Compliance in addition to Part 1 of the IHM.
- 3.2. Verification of the IHM can be undertaken by a Recognised Organisation subject to the verification process being completed in accordance with MEPC.269(68).
- 3.3. Recognised Organisations to SKANReg should apply for approval to provide verification services prior to assignment for such services.

#### 4. Certification Procedures

- 4.1. Recognised Organisations who are procured for the verification services and issuance of Statement of Compliances (SOC) may issue an Interim for an initial period of 5 months.

- 4.2. Samples taken during the initial survey will have an adequate window to be assessed by the designated laboratory for hazardous materials therefore this Administration will require sufficient justification for any further period being granted.
- 4.3. Upon issuance of the Interim SOC, Part I of the IHM should be affixed to the Interim SOC and be available for inspection.
- 4.4. In cases of Force Majeure and Global Pandemic, Recognised Organisations are advised to take a risk-based approach with regards to Initial, Annual & Renewal Surveys. Recognised Organisations wishing to propose an alternative method to conduct the respective survey should make an application to Alan Crass, Technical & Survey Manager – [alan.crass@skanregistry.com](mailto:alan.crass@skanregistry.com) and the undersigned ([liam.ryan@skanregistry.com](mailto:liam.ryan@skanregistry.com))
- 4.5. Issuance of any full-term Statement of Compliances will be delegated to the Recognised Organisation upon the completion of the testing phase of any samples collected.
- 4.6. Recognised Organisations should ensure updated IHM's are available onboard St Kitts and Nevis vessels at the earliest opportunity.

Questions related to any contents of this circular should be made to Alan Crass, Technical & Survey Manager – [alan.crass@skanregistry.com](mailto:alan.crass@skanregistry.com) and the undersigned - [liam.ryan@skanregistry.com](mailto:liam.ryan@skanregistry.com).

Yours truly,

Liam Ryan  
*International Registrar of Shipping and Seamen*