

Subject

Replacement from Statement of fact to Statement of Compliance for Inventory of Hazardous Materials onboard the vessel

# **ClassNK**

## ***Technical Information***

No. TEC-1051  
Date 27 October 2015

To whom it may concern

Please be informed that "Statement of Fact" for the Inventory of Hazardous Materials issued by ClassNK regarding the Ship Recycling Convention will be replaced with "Statement of Compliance". To assist ship owners for taking corresponding actions to the Ship Recycling Convention and the EU Regulation, ClassNK will issue "Statement of Compliance" for ships which are affixed with class notation "IHM" and therefore shall have the periodical audit for maintenance of the Inventory, instead of "Statement of Fact". "Statement of Compliance" certifies the conformity at the recent periodical audit for maintenance of the Inventory though "Statement of Fact" does it only at the initial audit.

The EU Regulation on Ship Recycling (hereinafter referred to as "the EU Regulation") entered into force on 30th December 2013. Details can be found in our Technical information TEC-0978. As a consequence of the EU Regulation, EU flagged ships and Non-EU flagged ships that may call at a port or anchorage of EU Member State, on or after the day defined by regulation (Please refer Table 1 below), shall possess and maintain an Inventory of Hazardous Materials, a list which indicates types and amounts of hazardous materials and their location. PSC is imposed on both EU Flagged ships and Non-EU flagged ships at the port or anchorage of an EU Member State. It will be basically confirmed through PSC whether the Inventory onboard the ship is properly maintained and updated, and a valid statement of compliance issued by the Flag or the RO in accordance with the national requirements is kept onboard.

(To be continued)

#### NOTES:

- ClassNK Technical Information is provided only for the purpose of supplying current information to its readers.
- ClassNK, its officers, employees and agents or sub-contractors do not warrant the accuracy of the information contained herein and are not liable for any loss, damage or expense sustained whatsoever by any person caused by use of or reliance on this information.
- Back numbers are available on ClassNK Internet Homepage (URL: [www.classnk.or.jp](http://www.classnk.or.jp)).

Table 1: Time to develop and have on board the Inventory of Hazardous Materials Part I

Applicable Ships	Definition of the ships	Time to develop and to have on board Part I of the Inventory
EU flagged new ships	An EU flagged ship for which either: (a) the building contract is placed on or after the date of application of this Regulation; (b) in the absence of a building contract, the keel is laid or the ship is at a similar stage of construction six months after the date of application of this Regulation or thereafter; or (c) the delivery takes place thirty months after the date of application of this Regulation or thereafter	Before put in service after the application date of the Regulation (As for the application date, please refer to note 1 below this table.)
EU flagged existing ships	EU flagged ships which is not "EU flagged new ships"	Before 31 December 2020 (If a ship is recycled before 31 December 2020, IHM shall be prepared prior to recycling.)
Non-EU flagged ships	Ships of a third country calling at a port or anchorage of a Member State	Before 31 December 2020

(Note 1) This Regulation shall apply from the earlier of the following two dates, but not earlier than 31 December 2015:

- (a) 6 months after the date that the combined maximum annual ship recycling output of the ship recycling facilities included in the European List constitutes not less than 2.5 million light displacement tonnes (LDT).
- (b) On 31 December 2018.

The procedure to issue "Statement of Compliance" instead of "Statement of Fact" is as follows;

1. For the ships with class notation "IHM" and Statement of Fact already issued by ClassNK  
At the occasion of next class periodical survey, based on the result of the periodical audit for Inventory, ClassNK Marine and Industrial Service Department (MID) will issue Statement of Compliance later.
2. For the ships without class notation "IHM" and with Statement of Fact already issued by ClassNK  
On request, please submit application for affix class notation IHM and Statement of Compliance to MID. After the completion of the audit for maintenance of Inventory onboard the ship, MID will issue Statement of Compliance later. And class certificate specified with class notation "IHM" will be re-issued later.
3. For the ship not classified by ClassNK with Statement of Fact already issued by ClassNK  
It is impossible to conduct periodical audit since the vessel is not classed by ClassNK. Statement of Compliance cannot be issued. Please continue to possess Statement of Fact the same as before.

(To be continued)

The issuance of Statement of Compliance for the ships specified in the above 1 and 2 will not be charged until 31 December 2018 (The last day of the possible EU Regulation applicable date). The periodical audit of the inventory will not be charged, as in the past, until the day when the Ship Recycling Convention enters into force, if it is carried out during the periodical class survey.

Corresponding to the above, "ClassNK Guidelines for the Inventory of Hazardous Materials" was amended (refer to No. TEC-1050). Issuance of the Statement of Compliance will start on 1st November 2015 on which the amended ClassNK Guidelines will enter into force. The amended ClassNK Guidelines can be referred to on ClassNK Home Page.

(Note)

In addition to the above, EU flagged ships are required to have the inventory complying with additional requirements of the EU Regulation and the inventory certificate in the format established in the implementing acts which will be adopted by the EU Commission in near future. After detailed information on the EU Regulation has been published by EU, we will inform you taking into consideration of corresponding action as soon as possible. This is the same when a third country establishes any additional requirements for the inventory to the Ship Recycling Convention.

For any questions about the above, please contact:

NIPPON KAIJI KYOKAI (ClassNK)  
Ship Management Systems Department, Administration Center, Head Office  
Address: 4-7 Kioi-cho, Chiyoda-ku, Tokyo 102-8567, Japan  
Tel.: +81-3-5226-2173  
Fax: +81-3-5226-2174  
E-mail: [smd@classnk.or.jp](mailto:smd@classnk.or.jp)

◇Department in charge until 31 March 2018  
NIPPON KAIJI KYOKAI (ClassNK)  
Marine and Industrial Service Department, Administration Center Annex, Head Office  
Address: 3-3 Kioi-cho, Chiyoda-ku, Tokyo 102-0094, Japan  
Tel.: +81-3-5226-2175  
Fax: +81-3-5226-2177  
E-mail: [mid@classnk.or.jp](mailto:mid@classnk.or.jp)