

Subject

Commencement of the EU Regulation on Ship Recycling

ClassNK

Technical Information

No. TEC-1170

Date 28 December 2018

To whom it may concern

As already informed by the ClassNK Technical Information TEC-0978, please be noted that the application of the EU Regulation on Ship Recycling will commence on 31 December 2018, in accordance with the relevant regulation.

By the Regulation, development of inventory of hazardous materials (IHMs), a list which indicate type and amount of hazardous materials and their location in a ship, is required in line with the schedule given in the Table 1 below for both EU flagged ships and non-EU flagged ships. In addition to control of hazardous materials and IHMs, ship owners have to ensure that their ships to be recycled only at the recycling facilities included in the EU List, which list ship recycling facilities authorized in accordance with the Regulation.

For outlines of the EU Regulation on Ship Recycling, please refer to the said ClassNK Technical Information TEC-0978.

Table1 Deadline for development and having on board of an IHM

| Applicable Ships | Definition of the ships | Time to develop and to have on board part I of an IHM |
|----------------------|---|---|
| EU flagged new ships | An EU flagged ship for which either: (i) the building contract is placed on or after 31 December 2018; (ii) in the absence of a building contract, the keel of which is laid or which is at a similar stage of construction on or after 30 June 2019 (six months after the date of application of this Regulation); (iii) the delivery takes place on or after 30 June 2021 (thirty months after the date of application of this Regulation) | Before put in service after 31 December 2018 |

(To be continued)

NOTES:

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|---------------------------|--|--|
| EU flagged existing ships | EU flagged ships which are not "EU flagged new ships" | Before 31 December 2020 (If a ship is to be recycled before 31 December 2020, IHM shall be prepared prior to recycling.) |
| Non-EU flagged ships | Ships registered in third countries calling at a port or anchorage of a Member State | Before 31 December 2020 |

1. Survey and Certification (Inventory Certificate) for EU flagged ships

1.1 General

As a recognised organization (RO) of the EU member state which has obtained the authorization, ClassNK can conduct survey and issue the certificate, shown in the Table 2 below, to the EU flagged ships on or after 31 December 2018 in accordance with the EU regulation.

The shipowner (or concerned) of EU flagged ship needs to prepare IHM conforming to the EU regulation, and ensure to have inventory certificate by the deadline shown in Table 1 above.

Table 2 Surveys and Certificates to EU flagged ships

| Type of survey | Content | Entity |
|-------------------|---|--|
| Initial survey | Survey of an IHM; Issuance of the inventory certificate | Flag state or RO |
| Renewal survey | Survey of an IHM; Issuance of the inventory certificate | Flag state or RO; every 5 years |
| Additional survey | Survey of an IHM; Endorsement of the inventory certificate | Flag state or RO; by request of a ship owner after a change, replacement or significant repair |
| Final Survey | Survey of an IHM and a Ship Recycling Plan (SRP); Issuance of the ready for recycling certificate | Flag state or RO; prior to recycling |

1.2 Procedures of the application for inventory certificate

Following to the ship's category given in Table 3 below, please make an application for issuance of the inventory certificate to ClassNK site office or head office.

(To be continued)

Table 3 Application and survey procedures for issuance of inventory certificate

| Category | | Applicant | Contact point | Documents | Time and procedure for initial survey |
|---|--|-----------|-------------------|---|---|
| (i) New ship and Existing ship for which the IHM is developed with the "new ship" method specified in the 4.1 of IMO guidelines | | Shipyard | Site office | - Application (Form 1A) - Documents prescribed by ClassNK guidelines | Ship design and construction stage before put in service: 1.Pre-review of the IHM 2.Onboard inspection 3.Final review of the IHM |
| (ii) Existing ship (except for (1) above) | In the case where the ship's IHM is newly developed | Shipowner | Head office (SMD) | - Application - Documents prescribed by ClassNK guidelines | As early as possible considering the following steps needed (also ship's schedule such as dry docking): 1.Review of the Visual Sampling Check Plan (VSCP) 2.Onboard inspection 3.Review of the IHM |
| | In the case where the ship has IHM and SOC issued by ClassNK (with no description for compliance with EU Regulation in them) | Shipowner | Head office (SMD) | - Application - Existing IHM/SOC - Documents necessary for the additional investigation (Please contact to SMD for details) | As early as possible considering the following steps needed: 1.Review of the VSCP for additional investigation 2.Onboard inspection 3.Review of the IHM reflecting to the result of additional investigation |
| | In the case where the ship has IHM conforming to EU Regulation and SOC (EU) issued by ClassNK | Shipowner | Site office | - Application - Existing IHM/SOC | Any timing such as the periodical survey: 1.Onboard inspection |

(To be continued)

Note 1) Development process of the IHM for EU flagged ships

Compared to the IMO/Hong Kong Convention, additional two hazardous materials, perfluorooctane sulfonic acid (PFOS) and hexabromocyclododecane (HBCDD), are required to be included in IHM.

For "new ship", investigation of the hazardous materials is to be carried out by the procedure specified in 4.1 of IMO guideline (Resolution MEPC.269(68)), with the Material Declaration (MD) including PFOS and HBCDD, and Supplier's Declaration of Conformity (SDoC).

For "existing ship", investigation of the hazardous materials is to be carried out by the procedure specified in 4.2 of IMO guideline (Resolution MEPC.269(68)), referring to Annex C of the EMSA's Best Practice Guidance on the Inventory of Hazardous Materials (October 2016) in terms of PFOS and HBCDD. If possible, investigation can be carried out by the procedures for new ship.

The EMSA's Best Practice Guidance on the Inventory of Hazardous Materials are available at:

<http://www.emsa.europa.eu/emsa-documents/latest/item/2874-emsa-s-best-practice-guidance-on-the-inventory-of-hazardous-materials.html>

Note 2) Initial survey for ships having SOC issued by ClassNK

As mentioned in Note 1) above, in EU Regulation, additional two hazardous materials (PFOS and HBCDD) are required. However, it is not mandatory to EU flagged existing ships to include HBCDD in IHM at its initial development.

Therefore, for the EU flagged existing ships having SOC issued by ClassNK, at a minimum, additional investigation of PFOS for the IHM belonging to that ships is required, unless otherwise stated in the SOC regarding the conformity with Article 5 of the EU Regulation.

To this end, the initial survey is to be carried out for that ship by 31 December 2020, with the revised IHM reflecting the result of additional investigation of PFOS at a minimum, with the statement that it is prepared pursuant to Article 5 of the EU Regulation in it. In this case, MD/SDoC, if any, related to maintenance and updating of the IHM should also be submitted.

For the ships having SOC issued by ClassNK with the statement that in conformity with Article 5 of the EU Regulation, additional investigation of PFOS is not necessary and the initial survey is to be carried out by 31 December 2020, with the maintained and updated IHM along with MD/SDoC.

2. Survey and Certification (Statement of Compliance) for Non-EU flagged ships

According to the paragraph 6, Article 12 of EU Regulation, Non-EU flagged ships shall have on board a statement of compliance (SOC) issued after verification of the IHMs by the Administration whose flag the ship is flying or an organisation authorised by them, in accordance with the national requirements. However, in this context, there is no information or notification on the national regulation other than issued by EU so far.

Therefore, for Non-EU flagged ships, ClassNK will continue to provide the IHM appraisal service for issuance SOC in accordance with "Guidelines for the Inventory of Hazardous Materials" issued by ClassNK (ClassNK guidelines), which is developed based on IMO Guidelines (Resolution MEPC.269(68)).

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In the future, if there are instructions from other Flag Administrations to issue SOC according to their national requirements, ClassNK will conduct the survey and certification accordingly. In this case, the survey is to be carried out taking into consideration the relevant services previously done by ClassNK. On the other hand, for Non-EU flagged ships, if ship owner intends to prepare and maintain the IHM that conforms to the requirements of Article 5 of the EU Regulation on a voluntary basis, where appropriate, ClassNK will issue SOC with the statement that it is in conformity with the EU Regulation in addition to the IMO/Hong Kong Convention.

Note) Non-EU flagged ships having SOC issued by ClassNK

For the IHM of Non-EU flagged ships that ClassNK have ever issued SOC, it is in conformity to the EU Regulation since an investigation of PFOS is not required for those ships.

The provision of paragraph 3, Article 12 of the EU Regulation states that at the time of preparing the IHM of a non-EU flagged ship, at least the materials listed in Annex I of the EU Regulation should be investigated. Also, among the substances of Annex I, originally including PFOS in IHM is not required for Non-EU flagged ships.

For this reason, to investigate the substances listed in Table A of the IMO Guidelines (Resolution MEPC.269(68)) for Non-EU flagged ships is identical so that it can be interpreted that the ships having IHM in compliance with the IMO guidelines satisfy the EU Regulation.

3. PrimeShip-GREEN/SRM upgrades

ClassNK offers PrimeShip-GREEN/SRM, utilizes a Cloud Computing System to support development of IHM for newly built ships. The functions responding to inclusion of PFOS and HBCDD in IHM (required by Article 5 of the EU Regulation) are added, and now it is possible to develop IHM conforming to Article 5 of the EU Regulation.

For any questions about the above, please contact:

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