

Subject

The Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009  
(the Ship Recycling Convention)

# ClassNK Technical Information

No. TEC-1311  
Date 30 October 2023

To whom it may concern

The Ship Recycling Convention, hereinafter referred to as the Convention, will enter into force on 26 June 2025, as announced in ClassNK Technical Information No. TEC-1300. This Technical Information provides a summary of the Ship Recycling Convention.

- 1 Effective date: 26 June 2025
- 2 Application:
  - (1) This Convention shall apply to:
    - (i) ships entitled to fly the flag of a Party or operating under its authority, and
    - (ii) ship recycling facilities operating under the jurisdiction of a Party.
  - (2) The Convention shall not apply to the following. However, each Party can ensure, by the adoption of appropriate measures, that such ships act in a manner consistent with this Convention, so far as it is reasonable and practicable.
    - (i) ships of less than 500 GT
    - (ii) ships operating throughout their life only in waters subject to the sovereignty or jurisdiction of the State whose flag the ship is entitled to fly.

"Ship" means a vessel of any type whatsoever operating or having operated in the marine environment and includes submersibles, floating craft, floating platforms, self-elevating platforms, Floating Storage Units (FSUs), and Floating Production Storage and Offloading Units (FPSOs), including a ship stripped of equipment or being towed.

- 3 Requirements for ships
  - (1) Design, construction, operation, and maintenance of ships
    - (i) Controls of ships' hazardous materials  
An installation or use of hazardous materials listed in Appendix 1 to the Convention on ships shall be prohibited and/or restricted.

<b>Materials prohibited and/or restricted for installation or use on ships</b>
Asbestos, Ozone-depleting substances, Polychlorinated biphenyls (PCB), Organotin compounds which act as biocides in anti-fouling systems, Cybutryne in anti-fouling systems

(To be continued)

NOTES:

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- (ii) Inventory of Hazardous Materials onboard a ship (the Inventory (IHM))
  - (a) The inventory (IHM) consists of:
    - Part I: Materials contained in ship structure or equipment
    - Part II: Operationally generated wastes (Oil and waste remaining on board, etc.)
    - Part III: Stores (Household electronics, etc.)
  - (b) Deadline for having Part I of the Inventory (IHM) onboard is as given in the table below:

Category	Definition	Deadline for providing the ship with IHM
New ship	"New ship" means a ship: <ol style="list-style-type: none"> <li>1 for which the building contract is placed on or after the entry into force of the Convention on 26 June 2025; or</li> <li>2 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 six months after the entry into force of the Convention (26 December 2025); or</li> <li>3 the delivery of which is on or after 30 months after the entry into force of the Convention (26 December 2027).</li> </ol>	By the date of delivery of the ship
Existing ship	"Existing ship" means a ship which is not a new ship.	Not later than five years after the entry into force of the Convention: 25 June 2030, or before going for recycling if this is earlier

- (c) The hazardous materials subject to Part I of the inventory (IHM), are as given in the Table A and Table B below.

Table A: Hazardous materials listed in Appendix 1 of the Convention
Asbestos, Ozone Depleting Substance, Polychlorinated Biphenyls (PCBs), Organotin compounds which act as biocides in anti-fouling systems, and Cybutryne in anti-fouling systems

Table B: Hazardous materials listed in Appendix 2 of the Convention
Cadmium and Cadmium Compounds, Hexavalent Chromium and Hexavalent Chromium Compounds, Lead and Lead Compounds, Mercury and Mercury Compounds, Polybrominated Biphenyl (PBBs), Polybrominated Diphenyl ethers (PBDEs), Polychloronaphthalenes (Cl >= 3), Radioactive Substances, and Certain Shortchain Chlorinated Paraffins

(To be continued)

- (d) Part I of the inventory (IHM) for a new ship is developed by the shipbuilder at the time of construction. Verification of the existence of hazard materials onboard should be carried out by collecting the Material Declaration (MD) and Supplier's Declaration of Conformity (SDoC) from suppliers, i.e., manufacturers, which is called the new-ship method. We have developed a system called PrimeShip-GREEN/SRM to assist in the process of developing an inventory using the new-ship method. You can register for the service from <https://www.psgreensrm.com/>.
- (e) For existing ships, the existing-ship method may be applied, which Part I of the inventory (IHM) may be developed with hazmat expert investigation and analysis, as an alternative to the new-ship method where the new-ship method is not feasible.
- (f) Part I of the inventory (IHM) shall be properly maintained and updated throughout the ship's operational life to reflect any changes in the location and quantities of the hazardous materials resulting from new installations containing hazardous materials and relevant changes in the ship's structure and equipment. The shipowner verifies whether the hazardous materials are present on board by collecting the Material Declaration (MD) and Supplier's Declaration of Conformity (SDoC) from the supplier.

It is the responsibility of the shipowner to establish a system for the maintenance of Part I of the inventory (IHM) and to properly maintain and update Part I of the inventory (IHM). Shipowners should implement the following measures in order to ensure the conformity of Part I of the inventory (IHM).

- (1) to designate a person as responsible for maintaining and updating the inventory (IHM) (i.e. to assign the designate person on procedural manual);
- (2) the designated person should establish and supervise a system to ensure the necessary updating of the inventory (IHM) in the event of new installation (i.e. to draw up a procedural manual);
- (3) to maintain the inventory (IHM) including dates of changes or new deleted entries and the signature of the designated person; and
- (4) to provide related documents as required for the survey or sale of the ship.

An example of the procedural manual can be found on our website. The URL shown on the last page of this TEC.

- (g) Parts II and III of the inventory (IHM) are developed by the shipowner prior to recycling. The shipowner completes the inventory (IHM) by adding Part II and III to the Part I, which has been properly maintained and updated.

(2) Surveys and certification

The kind of survey and certification required for a ship are listed below.

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- (i) **Initial Survey:**  
The first survey before the ship is put into service, or the first survey for an existing ship before the International Certificate on Inventory of Hazardous Materials is issued. This survey shall verify that Part I of the inventory (IHM) is in accordance with the requirements of the Convention. Once the survey has been completed, the International Certificate on Inventory of Hazardous Materials is issued.
- (ii) **Renewal Survey:**  
The survey that shall be carried out at intervals not exceeding five years. This survey shall verify that Part I of the inventory (IHM) complies with the requirements of the Convention. Once the survey has been completed, the International Certificate on Inventory of Hazardous Materials is issued.
- (iii) **Additional Survey:**  
As needed, this survey may be carried out at the request of the shipowner after a change, replacement, or significant repair of the structure, equipment, systems, fittings, arrangements, and material. The survey shall be carried out in such a way as to verify that a ship complies with the requirements of the Convention and Part I of the inventory (IHM) after such a change, replacement, or significant repair and that Part I of the inventory (IHM) has been updated, accordingly. Once the survey has been completed, the International Certificate on Inventory of Hazardous Materials is endorsed.
- (iv) **Final Survey:**  
The survey shall be carried out prior to the ship being taken out of service and before the recycling of the ship has started. The main points to be verified are the followings.
- (a) The inventory of hazardous materials - Parts I, II and III - meets the requirements of the Convention.
  - (b) The ship recycling plan developed by the ship recycling facility complies with the requirements of the Convention and has been approved by the competent authority(ies), i.e., the recycling state(s).
  - (c) The ship recycling facility(ies) where the ship is to be recycled holds a valid authorization in accordance with this Convention.
- Once the survey has been completed, the ship is issued with an International Ready for Recycling Certificate.
- (v) **Occasional Survey:**  
The Convention does not define an occasional survey. However, our society occasionally carries out a survey which does not fall under a scope of the additional survey, as an occasional survey at the time of a change of the name of the ship, flag administration, company, etc.

#### 4 Procedures for recycling a ship

Ships destined for recycling and to which the Convention applies shall be recycled only at ship recycling facilities authorized by the competent authority(ies) of the recycling state(s) in accordance with the Convention. Please draw your attention to the following steps required to recycle a ship.

(To be continued)

- (1) A shipowner shall notify the flag administration in due time and in writing of the intention to recycle a ship to enable the administration to prepare for the survey and certification required by this Convention. (Reg.24 of the Annex to the Convention)
  - (2) Shipowner shall complete the inventory (IHM) by properly maintaining and updating Part I of the inventory (IHM) and developing both Part II (Operationally Generated Wastes) and Part III (Stores). (Reg.5 and Regulation 8 of the Annex to the Convention)
  - (3) Ship recycling facility(ies) shall develop a ship-specific ship recycling plan, taking the inventory (IHM) completed by the shipowner into consideration. (Reg.9 of the Annex to the Convention)
  - (4) Ship recycling facility(ies) shall notify the competent authority(ies) of the recycling state(s) in writing that it is preparing to receive a ship for recycling and shall submit the ship recycling plan. (Reg. 24 of the Annex to the Convention)
  - (5) Competent authority(ies) of the recycling state(s) shall review and approve the ship recycling plan. Tacit approval of the ship recycling plan may be deemed to have been given if no written objection to the plan has been issued by the authority(ies) within the end date of a 14-day review period specified on the acknowledgement of the ship recycling plan. (Reg.9 of the Annex to the Convention)
  - (6) Ship recycling facility(ies) shall provide a shipowner with the ship recycling plan that has been approved by the competent authority(ies) of the recycling state(s). The shipowner shall undergo a final survey either by the flag administration, or the recognized organizations authorized by the flag administration based on the approved plan and the completed inventory (IHM). Upon the final survey completed, the ship is issued with an International Ready for Recycling Certificate. (Reg.10 and Reg.11 of the Annex to the Convention)
  - (7) Ship recycling facility(ies) shall report the competent authority(ies) of the recycling state(s) in writing of the planned start date of the ship recycling, using the form of Appendix 6, together with a copy of the International Ready for Recycling Certificate. (Reg.24 of the Annex to the Convention)
  - (8) Ship recycling facility(ies) shall issue a statement of completion using the form of Appendix 7 and submit it to the competent authority(ies) of the recycling state(s) within fourteen (14) days from the date of partial and complete ship recycling. The competent authority(ies) shall send a copy of the statement of completion to the flag administration. (Reg.25 of the Annex to the Convention)
- 5 Replacement of an existing Statement of Compliance
- It is necessary to replace an existing Statement of Compliance on Inventory of Hazardous Materials (SoC) with an International Certificate on Inventory of Hazardous Materials. We will follow the policy of the flag administrations. As soon as we receive updated information about their policies, we will notify it on our website.

(To be continued)

The latest information on instructions in relation to the requirements of the Ship Recycling Convention, including the status of the delegation of authority, is available on the following ClassNK website.  
<https://www.classnk.or.jp/hp/en/activities/statutory/shiprecycle/index.html>

For any questions about the above, please contact:

[For questions on the inventory and compliance to statutory requirements]

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