

Subject

Maintaining and updating part I of the Inventory during operations with the Hong Kong Convention (Ship Recycling Convention)

ClassNK

Technical Information

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To whom it may concern

The Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 (hereinafter referred to as the "Ship Recycling Convention"), will enter into force on 26 June 2025, as announced in ClassNK Technical Information No. TEC-1311.

ClassNK provide guidance on the maintenance of Part I of the Inventory of Hazardous Materials (IHM) required for shipowners, in accordance with the Ship Recycling Convention and the IMO Guidelines for Inventory Development (Resolution MEPC.379(80)).

With regard to the maintenance of Part I of the Inventory of Hazardous Materials (hereinafter referred to as "IHM"), the following requirements are imposed on shipowners/ship management companies by the Convention and the IMO guidelines:

1. The IHM should be properly maintained throughout the operational life of the ship.
2. The maintenance of the IHM should be conducted by the designated responsible person by the shipowner or ship management company.
3. The update history of the IHM should be recorded within the IHM, along with the signature of the responsible person.
4. All documents related to the IHM belong to the vessel, these should be provided at the time of relevant survey or sale.

Please note that according to the IMO Guidelines for Port State Control (PSC) inspections related to the Ship Recycling Convention (Resolution MEPC.223(64)), the implementation of the procedures for maintaining the IHM will be one of the items subject to verification.

In view of the above, ClassNK surveyors will confirm the procedures for maintaining the IHM and the updated IHM to reflect changes during the relevant survey carried out under the Convention and under applied the ClassNK guidelines before the Convention's entry into force.

The Ship Recycling Convention does not specify a format for the maintenance procedures. However, if there are deficiencies in procedures, various problems may arise. Therefore, ClassNK has made available an example of an IHM maintenance procedure document that meets the requirements on ClassNK website, accessible via the URL provided at the end of this document. ClassNK recommend that those who are preparing procedures for the maintenance of the IHM refer to this example to ensure proper management.

(To be continued)

NOTES:

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For reference documentation,

The Ship Recycling Convention and the IMO Guidelines for Inventory Development (Resolution MEPC.379(80)) for the maintenance and management of IHM refer to the following;

Regulation 5.3 of the Ship Recycling Convention

Part I of the Inventory of Hazardous Materials shall be properly maintained and updated throughout the operational life of the ship, reflecting new installations containing Hazardous Materials listed in Appendix 2 and relevant changes in ship structure and equipment, taking into account the guidelines developed by the Organization.

Resolution MEPC.379(80) Annex

2023 Guidelines for the development of the inventory of hazardous materials

4.3 Maintaining and updating part I of the Inventory during operations

4.3.1 Part I of the Inventory should be appropriately maintained and updated, especially after any repair or conversion or sale of a ship.

4.3.3 Continuity of part I of the Inventory

Part I of the Inventory should belong to the ship and the continuity and conformity of the information it contains should be confirmed, especially if the flag, owner or operator of the ship changes.

5.2 Operational stage

Shipowners should implement the following measures in order to ensure the conformity of part I of the Inventory:

- (1) to designate a person as responsible for maintaining and updating the Inventory (the designated person may be employed ashore or on board);
- (2) the designated person, in order to implement paragraph 4.3.2, should establish and supervise a system to ensure the necessary updating of the Inventory in the event of new installation;
- (3) to maintain the Inventory 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.

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.

HOME > Products & Services > Statutory Services > Ship Recycling Convention

URL: <https://www.classnk.or.jp/hp/en/activities/statutory/shiprecycle/index.html>

(To be continued)

For any questions about the above, please contact:

[For questions on the Ship Recycling Convention]

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