

Palau International Ship Registry



Europe Head Office
Piraeus, 18536, Greece
5, Sachtouri Street
6th floor
T: +30 210 4293500
F: +30 210 4293505
info@palaureg.com

USA Head Office
The Woodlands, TX, 77380
9595 Six Pines Drive,
Suite 8210, Office 277
T: +1 832 631 6061
F: +1 832 631 6001
www.palaureg.com

MARINE CIRCULAR 189.1

To: RECOGNIZED ORGANIZATIONS, SHIPOWNERS, MANAGERS, OPERATORS, MASTERS, DEPUTY REGISTRARS, AND FLAG STATE INSPECTORS.

Subject: INVENTORY OF HAZARDOUS MATERIALS – STATEMENT OF COMPLIANCE

1. Reference
 - 1.1 Ship Recycling Regulation No. 1257/2013 (EU SRR)
 - 1.2 Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009.
 - 1.3 Resolution MEPC.269(68) *Guidelines for the Development of the Inventory of Hazardous Materials*
 - 1.4 Resolution MEPC 222(64) *Guidelines for the Survey and Certification of Ships under the Hong Kong Convention*
2. Purpose
 - 2.1 This Marine Circular provides instructions on issuing a Statement of Compliance (SoC) for an Inventory of Hazardous Materials (IHM).
3. Applicability
 - 3.1 This Marine Circular applies to new and existing ships of 500 GT or more registered with the Palau Flag.
4. Background Information
 - 4.1 The Hong Kong Convention was adopted in 2009 to effectively address, the environmental, occupational health and safety risks related to ship recycling. Upon entry into force, the Hong Kong Convention will require new ships and existing ships of 500 GT and above, to have onboard a valid International Certificate of Compliance on Inventory of Hazardous Materials (IHM) which documents ship-specific information on the actual hazardous materials present on board in order to protect health and safety of the crew, and to protect health and safety of workers at ship recycling facilities and avoid environmental pollution when the ship is going for recycling.
 - 4.2 The European Parliament formally adopted the EU SRR on October 22nd 2013. The EU SRR entered into force on December 30th 2013. The EU SRR requires all non-EU-flagged ships of 500 GT and above calling at EU ports; from December 31st 2020, to have onboard a valid IHM with a Statement of Compliance.



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4.3 Shipowners with ships calling at ports in the EU are therefore encouraged to develop the IHM for approval prior to December 31st 2020. To meet the requirements of the EU SRR there should be a reference in the Statement of Compliance stating that the IHM has been developed to cover also the requirements of the EU SRR.

5. General Instructions

5.1 On request by the shipowner or shipmanager or Master, a SoC may be issued by an approved Recognized Organization. The following minimum requirements apply when seeking the issuance of the IHM.

5.1.1 The IHM must be ship-specific and take into account IMO Resolution MEPC.269(68). For an existing ship it must identify, at least, the hazardous materials listed in Appendix I of the Convention or Annex I of the EU SRR, as appropriate.

5.1.2 A plan must be established by the ship describing the visual/sampling check which the IHM is developed.

5.1.3 A laboratory used to carry out specific tests must take into consideration the guidance in MEPC.269(68), Appendix 9.

5.1.4 The IHM must be properly maintained and updated throughout the ship's operational life. It must reflect the new installations that contain hazardous materials referred to in Appendix II of the Convention or Annex II of the SRR, as appropriate, and relevant changes in the ship's structure and equipment, taking into account the exemptions and transitional arrangements applicable to those materials under international law.

5.1.4.1 The IHM and SoC must be written in English

5.1.4.2 Separate SoCs must be issued for the EU SRR and Hong Kong Convention.

6. Hong Kong Convention – Survey and Certification

6.1 Ships must be surveyed according to Convention Regulation 10. A SoC may be issued after successful completion of:

6.1.1 An initial survey before the ship is put in service; or

6.1.2 A renewal survey not exceeding five years.

The initial and renewal surveys must be harmonized under the Harmonized System of Survey and Certification. The issuance and endorsement of the SoC must conform to Convention Regulation 11.

6.2 An additional survey may be conducted at the request of the shipowner to ensure that any change, replacement, or significant repair made to the structure,



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equipment, systems, fittings, arrangements and material continues to comply with the Convention requirements.

- 6.3 A final survey must be conducted prior to the ship being taken out of service and before the recycling of the ship has started. Per Regulation 11, the initial and final surveys for existing ships are conducted at the same time.
 - 6.4 The SoC must be modeled on the format provided in Convention Appendix 3
 - 6.5 The validity of the SoC is five years, subject to the conditions set out in Convention Regulation 14. A valid SoC must be converted into an "International Certificate on Inventory Hazardous Materials" after the entry into force of the Hong Kong Convention and its ratification by the Republic of Palau.
7. EU SRR – Survey and Certification
 - 7.1 The EU SRR does not establish a period of validity for the SoC, unless so specified by the flag State. The Palau Ship Registry Administrator has determined, after taking into consideration the EMSA Guidelines covering port State Control, that the five years limit is also appropriate for an SoC issued under the EU SRR. This means that the initial, renewal and additional surveys will need to be conducted for Palau Registered vessel under the EU SRR.
 - 7.2 An SoC must be modeled on the format provided in Annex 3 of the European Maritime Safety Agency document, *Guidance on inspection of ships by the port state in accordance with Regulation (EU) 1257/2013 on ship recycling, inspections from the EU port States to enforce provisions of the ship recycling Regulation*, of September 27th 2019.
 8. Contact
 - 8.1 For further questions, please do not hesitate to contact the Technical Department of PISR at technical@palaureg.com

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