

## INVENTORY OF HAZARDOUS MATERIALS - EARLY COMPLIANCE WITH EU SHIP RECYCLING REGULATION

**Application:** All ship-owners, operators, masters and officers of merchant ships and authorised Classification societies, Barbados Registrars and Nautical Inspectors

Please note that by 31 December 2020, any ship on or over 500 GT, of any flag, calling at an EU port or anchorage, will need to have an EU Ship Recycling Regulation (EU SSR) compliant Inventory of Hazardous Materials (IHM) on board. Non-EU flagged vessels can comply with the EU SRR by complying with and being certified against the Hong Kong Convention.

For clients who also operate ships which fly the flag of an EU member state then under the requirements of the EU SRR, every new-build ship\* on or over 500 GT, contracted on or after 31 December 2018 will need to have an EU SRR compliant Inventory of Hazardous Materials (IHM).

The IMO Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships (known as the Hong Kong Convention (HKC)) was adopted in 2009 and will have global applicability once in force. The EU SSR was adopted in 2013 and it accelerates the implementation of the requirements of the HKC and sets out responsibilities for ship-owners and recycling facilities both within the EU and in other countries.

A key element of the HKC and EU SRR is the maintenance of an IHM. The format of the IHM will be updated by Classification Societies to ensure compliance with the HKC and EU SRR. Clients should ensure that their ship's IHM is updated in this new format for continued compliance with the HKC and EU SRR. Clients of existing ships with IHMs should start planning to comply with the EU SSR ahead of December 2020.

*\*EU SRR defines 'new ships' as ships for which either*

- (a) the building contract is placed on or after 31 December 2018;*
- (b) in the absence of a building contract, the keel is laid or the ship is at a similar stage of construction on or after 30 June 2019; or*
- (c) the delivery takes place on or after 30 June 2021*