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Notice to: Shipowners, Operators, Officers, Flag State Inspectors and Recognised Organisations.

1. References

- a) [Hong Kong Convention](#), Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009.
- b) EU SRR, [Regulation \(EU\) No 1257/2013](#) of the European Parliament and of the Council on ship recycling.
- c) EMSA [Guidance on inspections of ships by the port States](#) in accordance with Regulation (EU) 1257/2013 on ship recycling.

2. Purpose

- 2.1 This Bulletin provides instructions on the issue of Statements of Compliance (SoC) on Inventory of Hazardous Materials (IHM) under the Hong Kong Convention and the European Union Ship Recycling Regulation (EU SRR).

3. Application

- 3.1 This Bulletin applies to any vessel requesting a SoC for IHM or EU SRR.

4. General – IHM

- 4.1 Both the EU SRR and the Hong Kong Convention require vessels to develop and maintain an IHM and undergo a survey and certification to verify that the requirements are met.
- 4.2 A Barbadian vessel can be issued with a SoC by one of the Barbados Recognised Organisations (RO) after a satisfactory initial survey including verification that the IHM Part I meets the relevant requirements.
- 4.3 The IHM shall be vessel specific and shall identify, as a minimum, the hazardous materials listed in Appendix I of the Hong Kong Convention or Annex I of the EU SRR, as appropriate.
- 4.4 The IHM shall be properly maintained and updated throughout the vessel's operational life. It must reflect new installations that contain hazardous materials referred to in Appendix II of the Hong Kong Convention or Annex II of the EU SRR, as appropriate, and relevant changes in the vessel's structure and equipment, taking into account the exemptions and transitional arrangements applicable to those materials under international law.

5. Hong Kong Convention

- 5.1 The Hong Kong Convention was adopted in 2009 and will enter into force on 26 June 2025.
- 5.2 Barbados is not a signatory to the Hong Kong Convention, but Barbados ROs are authorised to survey vessels and issue voluntary SoC on behalf of Barbados when requested by the managers.
- 5.3 Vessels are to be surveyed in accordance with Regulation 10 of the Hong Kong Convention and a SoC may be issued following an initial or renewal survey. The renewal survey shall take place at intervals not exceeding five years.

- 5.4 The issuance and endorsement of the SoC shall be in accordance with Regulation 11 of the Hong Kong Convention and the SoC shall be based on the format of the International Certificate specified in Appendix 3 of the Hong Kong Convention.
- 5.5 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, equipment, systems, fittings, arrangements, and material continues to comply with the Convention requirements.
- 5.6 A final survey shall be conducted prior to the vessel being taken out of service and before the recycling of the vessel has started, except for existing vessels for which both an initial survey and a final survey are conducted at the same time.

6. EU SRR

- 6.1 Article 12 of the EU SRR requires vessels flying the flag of Barbados, which is a non-EU Member State, when calling at a port or anchorage of an EU Member State, to have on board an EU SRR SoC and IHM from 31 December 2020.
- 6.2 Barbados ROs are authorised to survey vessels and issue voluntary EU SRR SoC on behalf of Barbados when requested by the managers. The EU SRR SoC may be modelled on the basis of Appendix 3 to the Hong Kong Convention or in the format specified in Annex 3 of the EMSA Guidance on inspections of ships by the port States.
- 6.3 The EU SRR SoC and the inventory of hazardous materials shall be drawn up in English.
- 6.4 A Barbadian vessel may be warned, detained, dismissed or excluded from the ports or offshore terminals under the jurisdiction of an EU Member State in the event that it fails to submit to the relevant authorities of that Member State a copy of the EU SRR SoC in accordance with paragraphs 6 and 7 of Article 12 of EU SRR, together with the IHM, as appropriate and on request from those authorities.
- 6.5 An EU Member State taking such action shall immediately inform the BMSR. Failure to update the inventory of hazardous materials shall not constitute a detainable deficiency, but any inconsistencies in the inventory of hazardous materials shall be reported to the BMSR and shall be rectified at the time of the next survey.
- 6.6 The EU SRR does not establish a period of validity for the EU SRR SoC, unless so specified by the flag State. The BMSR requires the validity of EU SRR SoC to have a five-year validity in line with the IHM of Hong Kong Convention. Therefore initial, renewal and additional surveys, as applicable, will need to be conducted for Barbadian vessels under the EU SRR.

| Revision No | Description Of Revision |
|-------------|---|
| 1.0 | First Issue - Supersedes Information Bulletin 299 and 333 |
| 1.1 | <ul style="list-style-type: none"> • Sec. 3.1, 5.2, 5.6 - Replaced “ship/s” with “vessel/s”; • Header from page 2 onwards- Added doc revision; • Sec. 6 - Rewritten. |
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