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2.0

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10 Oct 2025

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29 Dec 2025

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

### 1. References

- a) [HKC](#), 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 for compliance with the provisions of the HKC and the EU SRR.

### 3. Application

- 3.1 This Bulletin applies to any Barbadian vessel.

### 4. General – IHM

- 4.1 Both the EU SRR and the HKC 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 an International Certificate on Inventory of Hazardous Materials (ICIHM) or with a SoC ( See Sec. 5 below) 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 HKC 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 HKC 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 HKC was adopted in 2009 and entered into force globally on 26 June 2025.
- 5.2 Barbados deposited its Instrument of Accession to the HKC with the International Maritime Organisation (IMO) on 29 September 2025. Accordingly, the Convention will enter into force for Barbados on 29 December 2025, in accordance with Article 17(3) of the Convention.
- 5.3 Until the entry into force of the HKC, Barbados ROs are authorised to conduct voluntary inspections and issue a Statement of Compliance (SoC) upon request by the vessel's managers.
- 5.4 From 29 December 2025, compliance with the HKC will become mandatory for all Barbadian vessels. Upon satisfactory completion of the relevant surveys, the authorised Barbados ROs shall issue:
  - .1 The International Certificate on Inventory of Hazardous Materials (ICIHM); and
  - .2 The International Ready for Recycling Certificate (IRRC), at the final survey.

- 5.5 For existing vessels, the voluntary SoC shall be replaced by the ICIHM at the first Harmonised Renewal Survey on or after 29 December 2025, and in any case by no later than 30 December 2030, or earlier if the vessel is intended for recycling.
- 5.6 Existing SOC shall remain valid and acceptable during the transitional period until they are formally replaced by the new Convention certificates.
- 5.7 The issuance of the ICIHM or the SoC shall be subject to an initial or renewal survey in accordance with Regulation 10 of the HKC.
- 5.8 Both the ICIHM or the SoC shall have a validity of a maximum of five (5) years in accordance with Regulation 11 of the HKC.
- 5.9 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.
- 5.10 A Final Survey shall be carried out prior to the vessel being permanently taken out of service and before any recycling activities commence. Upon satisfactory completion of this survey, the vessel shall be issued with an IRRC.

## 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 HKC 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 IHMs 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 HKC. 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"><li>• Sec. 3.1, 5.2, 5.6 - Replaced "ship/s" with "vessel/s";</li><li>• Header from page 2 onwards- Added doc revision;</li><li>• Sec. 6 - Rewritten.</li></ul> |
| 2.0         | Major reissue with changes all over the document.                                                                                                                                                 |
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