
Ship Recycling Requirements

Notice to ship owners, managers, Masters, Approved Nautical Inspectors, Recognised Organisations, and surveyors

1. Purpose

- 1.1. This Marine Notice was originally published in 2020 to provide instructions on the issue of Statements of Compliance on Inventory of Hazardous Materials (IHM) under the requirements of the international Maritime Organization (IMO) [Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009](#) (The Convention) and the European Union (EU) Ship Recycling Regulation ([No. 1257/2013 \(EU SRR\)](#)).

2. Application

- 2.1. This Notice applies to all new and existing ships of 500 gross tonnage and above requesting a Statement of Compliance on IHM under The Convention or EU SRR.
- 2.2. For the purpose of this Notice, a “new ship” is one:
- i. for which the building contract is placed on or after the entry into force of The Convention (i.e. on or after 26 June 2025); or
 - ii. in the absence of a building contract, for which the keel is laid, or which is at a similar stage of construction, on or after six months following the entry into force of The Convention (i.e. on or after 26 December 2025); or
 - iii. the delivery of which is on or after 30 months after the entry into force of The Convention (i.e. on or after 26 December 2027).

and an “existing ship” is any ship that is not a new ship as defined above.

3. Hong Kong International Convention

- 3.1. **The Convention, adopted in 2009, enters into force on 26 June 2025**, 24 months after the conditions for entry into force were met on 26 June 2023.

- 3.2. The Convention requires every applicable new and existing ship to have an Inventory of Hazardous Materials (IHM) and an International Certificate on IHM¹ onboard whilst in operation and before recycling at an authorised ship recycling facility.
- 3.3. The Bahamas is not a Party to the Hong Kong Convention at this time; however the Bahamas Maritime Authority (BMA) has authorised its Recognised Organisations to survey ships and issue Statements of Compliance on behalf of The Bahamas when requested by the Company in accordance with Regulation 11 of The Convention.
- 3.4. As a non-Party to the Convention, The Bahamas requires Statements of Compliance to be issued in lieu of the international certificates referred to in the Convention – the Statement of Compliance shall be based on the format of the International Certificate specified in Appendix 3 of The Convention.

4. The EU Ship Recycling Regulation (EU SRR)

- 4.1. The European Parliament adopted the European Union Ship Recycling Regulation EU No. 1257/2013 on 20 November 2013 with enforcement effective 31 December 2018. This requires EU Member State registered ships to have a valid Part I on IHM and International Certificate or Statement of Compliance.
- 4.2. As of 31 December 2020, in accordance with Article 12 of the EU SRR it is a requirement that all ships flying the flag of a third country (Non-Member State), when calling at a port or anchorage of an EU Member State, must have Part I IHM and Statement of Compliance in a format as specified in Appendix 3 of The Convention onboard.
- 4.3. The adoption of EU SRR requires vessels to meet standards for recycling leading to reduction and elimination of adverse effects on human health, environmental and to support implementation of the Hong Kong Convention. Leading to enforcement of safe and environmentally sound sustainable process whilst using approved ship recycling facilities.
- 4.4. The Hong Kong Convention and EU SRR place statutory requirements upon ship owners, operators, and recycling facilities to develop and adhere to the sustainable process for the recycling of ships.

¹ For Bahamian ships this will be a Statement of Compliance on IHM as described in paragraph 3.4.

5. General

- 5.1. On request of the Company², a Statement of Compliance may be issued by any Bahamas Recognised Organisation, as listed in Marine Notice 02, after satisfactory completion of initial survey including verification that the IHM Part I on Inventory of Hazardous Materials meets the relevant requirements.
- 5.2. Separate Statements of Compliance shall be issued for The Convention and EU SRR.

6. Inventory of Hazardous Materials

- 6.1. In accordance with Regulation 5 of The Convention and Article 5 of the EU SRR, each ship shall have a verified IHM onboard. The inventory is developed for new and existing ships with details maintained throughout the operational life of the ship and reflect new installations containing hazardous materials as listed within The Convention, inclusive of relevant changes to the ship structure, equipment and systems.
- 6.2. The IHM shall be ship-specific and developed in accordance with IMO Resolution [MEPC.379\(80\) 2023 Guidelines for the development of the inventory of hazardous materials](#) and shall provide the following.
 - i. Part I: Hazardous materials contained in the ship's structure and equipment for New and Existing ships upon delivery and whilst in operation;
 - ii. Part II: Operationally generated wastes; and
 - iii. Part III: Stores.

7. Development and production of Plan for Part I Inventory of Hazardous Materials.

- 7.1. In accordance with The Convention, the Company is responsible for development of a Plan to provide details for Part I IHM. This will contain information to identify the presence of hazardous material as listed in Tables A & B of Appendices 1 & 2 of MEPC.379(80).
- 7.2. For ships in operation, the Company can draw upon expert assistance to develop Part I, II & III of the Inventory plan, and who can proceed with specific tests in accordance with guidance in Appendix 9 of MEPC.379(80). The assigned expert shall be independent of the Administration and Recognised Organisation and accredited for

² The "Company" is the entity responsible for the management of the ship in accordance with the ISM Code. For ships which the ISM Code is not applicable, the Company is the Managing Owner in accordance with section 52 of the Merchant Shipping Act (Ch.268).

the work using quality assured procedures and accredited laboratory, working to international standards.

7.3. The following procedures are used to develop Part I IHM.

- i. collection of necessary information.
- ii. assessment of collected information.
- iii. preparation/assessment of visual/sampling check plan.
- iv. onboard visual check and sampling check; and
- v. preparation of part I of the Inventory and related documentation.

7.4. ***New Ships Inventory- Part I IHM***

7.4.1. An Inventory Plan should be compiled, starting at the design and throughout the construction stage. The Inventory shall account for presence of materials listed with documentation provided by the suppliers to the shipyard in the form of Material Declarations (MDs) and Suppliers Declarations of Conformity (SDOCs). The MDs and SDOCs should be provided for all machinery, equipment, materials, and coatings installed on board a vessel.

7.4.2. The Inventory will contain information on presence of hazardous material as listed in Tables A & B of Appendices 1 and 2 of MEPC.379(80).

7.5. ***Existing Ships Inventory- Part I IHM***

7.5.1. The Company is responsible for the development of the Inventory Plan which will provide details of visual/sampling checks to produce the Inventory, taking account of Resolution MEPC.379(80) Steps 1-5 and Resolution [MEPC.356\(78\) 2022 Guidelines for Brief Sampling of Anti-fouling Systems](#) and shall list all machinery, equipment, materials, structures and coatings which are installed onboard as fixed items.

7.5.2. The Inventory will include details of hazardous materials, their location, and approximate quantities as referred within the list of hazardous materials in accordance with Tables A & B of Appendices 1 and 2 of MEPC.379(80).

8. Development and production of Part II and Part III of IHM.

8.1. Upon a decision to recycle a ship and before the final survey, the Company shall develop the IHM to account for Part II (Operationally Generated Waste) and Part III (Stores) in accordance with Tables C & D of Appendices 1 & 2 of MEPC. 379(80).

- 8.2. If ships destined for recycling will conduct operations in the period prior to entering the ship recycling facility, steps shall be taken to minimise the amount of waste, cargo residues, fuel oil, and wastes remaining on board.
- 8.3. Prior to ships going to a recycling facility, ships will require validated Part I, II & III, and Statement of Compliance on IHM onboard to enable an International Ready for Recycling Certificate (IRRC)³ to be issued.

9. Dates Applicable to Enforcement of Part I IHM and Statement of Compliance

- 9.1. All **new ships**, as defined in section 2, are required to have a verified Part I IHM and Statement of Compliance onboard by 26 June 2025 or at time of delivery to comply with The Convention.
- 9.2. All **existing ships** shall have a verified Part I IHM and Statement of Compliance onboard and comply with The Convention by 26 June 2030, or prior to recycling if this is earlier.
- 9.3. Existing Bahamian ships and other non-EU/European Economic Area (EEA)/United Kingdom (UK) ships visiting EU/EEA/UK ports or anchorages within EU territorial waters have been required to have a verified Part I IHM and Statement of Compliance onboard after 31 December 2020 to comply with EU SRR.

10. Surveys, Issuance and Endorsement Certification

- 10.1. Ships to which The Convention is applicable shall be subject to surveys in accordance with Regulation 10.
- 10.2. **Initial survey:** required to verify that Part I IHM meets the requirements of Regulation 5 of The Convention before the Statement of Compliance on IHM is issued.
- 10.3. **Renewal survey:** will apply at intervals not exceeding five years. This survey shall verify that Part I IHM complies with The Convention and Statement of Compliance shall be endorsed.
- 10.4. **Periodical additional survey:** will be completed subject to requirements of the Company to ensure the Part I IHM takes account of amendments for change, replacement, or significant repair of the ship structure, equipment, systems, fittings.

³ For Bahamian ships this will be a Ready for Recycling Statement of Compliance as described in paragraph 3.4.

- 10.5. **Final survey:** will be completed prior to the cessation of service before departure for recycling of ship and in accordance with the provisions of Regulation 10 of The Convention and Article 9(9) of EU SRR. The survey will verify:
 - i. The Inventory of Hazardous Materials as required by regulation 5.4 of The Convention and Article 5 EU SRR.
 - ii. A Ship Recycling Plan shall be onboard as required by Regulation 9 of The Convention and Article 7 EU SRR. This will contain information for Inventory of Hazardous Materials as required by regulation 5.4. of The Convention and Article 7(d) of EU SRR.
 - iii. The Ship Recycling Facility at which the ship is to be recycled holds a valid authorisation in accordance with the Convention.
- 10.6. All initial and renewal surveys should be harmonised in accordance with IMO Resolution [A.1186\(33\) Survey Guidelines Under the Harmonized System of Survey and Certification \(HSSC\), 2023.](#)
- 10.7. The issuance and endorsement of the Statement of Compliance shall be in accordance with Regulation 11 or 12 of The Convention and Article 9 EU SRR based on the format of the International Certificate specified in Appendix 3 of The Convention.
- 10.8. When a Statement of Compliance is issued on completion of an initial or renewal survey, it shall not apply to existing ships were an initial survey and final survey are undertaken at the same time, when only the IRRC shall be issued.
- 10.9. Duration and validity of certificates are subject to Regulation 14 of The Convention and Article 9 EU SRR.
- 10.10. A Statement of Compliance on IHM shall be issued for a period which does not exceed five years.
- 10.11. If a Statement of Compliance is issued for a period of less than five years, the BMA may extend the validity beyond the expiry date to the maximum period specified in Regulation 10.1.2 of The Convention and Article 9 (7) EU SRR, which is five years.
- 10.12. An IRRC under regulation 11 or 12 of The Convention or Article 9(9) EU SRR shall be issued for a period which shall not exceed three months.
- 10.13. The IRRC shall cease to be valid if the condition of the ship does not correspond substantially with the particulars of the certificate and may be extended by the Recognised Organisation for a single point to point voyage to the ship recycling facility.

11. Ship Recycling Facilities

- 11.1. Upon the decision to recycle the ship, the Company shall obtain a Ship Recycling Plan from a Ship Recycling Facility which is authorised under the Hong Kong Convention and complies with the requirements of The Convention.

12. Ship Recycling Plan

- 12.1. The Ship Recycling Plan is ship specific. It is the responsibility of the approved ship recycling facility to develop the plan in accordance with IMO Resolution [MEPC.196\(62\) Guidelines for the Development of the Ship Recycling Plan](#) and Regulation 9 of The Convention, taking account of information provided by the Company and shall include details contained within Part I, II and III of IHM.
- 12.2. The ship recycling facility is responsible for acquiring authorisation from its national competent authority to proceed with the Ship Recycling Plan and completion of the recycling process for the ship.

13. International Ready for Recycling Certificate⁴

- 13.1. Before ships proceed to recycling, it will be a requirement to have an International Ready for Recycling Certificate (IRRC) onboard.
- 13.2. The IRRC is issued on completion of the final survey, in accordance with the provisions of Regulation 10 of The Convention.
- 13.3. Upon receipt of the IRRC the Company shall ensure the Parts I, II and III on IHM are onboard and maintained up to the point of delivery of vessel to the ship recycling facility to ensure no changes are undertaken which may affect the authorised ship recycling plan.

14. Enforcement of the EU SRR relating to the IHM in European waters

- 14.1. The EU SRR entered into force on 31 December 2020 and Article 12 of the EU SRR (EU) No. 1257/2013 requires ships flying the flag of a third country when calling at a port or anchorage of an EU Member State, to have on board a Statement of Compliance and IHM on date of enforcement.
- 14.2. The ship flying the flag of a third country 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 Statement of Compliance in accordance with paragraphs 6 and 7 of

⁴ For Bahamian ships this will be a Ready for Recycling Statement of Compliance as described in paragraph 3.4.

Article 12, together with the IHM, as appropriate and on request from those authorities.

- 14.3. Failure to update the IHM shall not constitute a detainable deficiency, but any inconsistencies in the IHM will be reported to the BMA by the Member State.
- 14.4. The EU SRR does not establish a period of validity for the EU SRR Statement of Compliance, unless so specified by the flag State. The BMA has concluded that the validity of Statements of Compliance with the Hong Kong Convention and EU SRR shall have a five-year validity, therefore initial, renewal and additional surveys, as applicable, will need to be conducted for Bahamian ships under the EU SRR.
- 14.5. The Statement of Compliance shall be in the format specified in Annex 3 of the European Maritime Safety Agency document "[Guidance on inspection of ships by the port States in accordance with Regulation \(EU\) 1257/2013 on ship recycling, inspections from the EU port States to enforce provisions of the ship recycling Regulation](#)" dated 27 September 2019.

15. Issuance of Statement of Compliance to non-EU Member Ships with a Hong Kong Convention compliant IHM entering EU Port States areas.

- 15.1. To acquire EU SRR Statement of Compliance the following is required.
 - 15.1.1. The up-to-date Part 1 on IHM must be submitted to the Recognised Organisation for approval. For the Recognised Organisation to issue the EU SRR Statement of Compliance, the submission of IHM shall include all evidence of maintenance procedure, details of new systems and equipment, products and applied and removed on the vessel with supporting documents such as Material Declarations (MD) from suppliers and updated IHM, in case the hazardous material situation of the vessel has changed.
 - 15.1.2. The Company should also make a statement in their report that after the EU SRR Statement of Compliance has been issued, the maintenance of this IHM shall be done according to EU SRR. That means for the new installations the shipowner shall collect MDs with hazardous materials, including Brominated Flame Retardant (HBCDD). Perfluorooctane sulfonic acid (PFOS) is not a requirement for non-EU flagged ships however the BMA strongly recommends using the MD form with fifteen hazardous materials, including PFOS and HBCDD for future maintenance.
- 15.2. The documents Part 1 IHM, material declarations and maintenance records shall be sent to the Recognised Organisation for review and approval.

- 15.3. Statements of Compliance for EU SRR will be issued subject to completion of an initial survey to verify the details of the Part 1 IHM. The period of validity shall not exceed 5 years, and the Statement should be harmonised with the ship's main class renewal date.

16. Queries

- 16.1. Any queries on this Notice may be submitted to tech@bahamasmaritime.com or any BMA office.

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