



EU SHIP RECYCLING REGULATION INTO FORCE ON 31 DECEMBER 2018

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Guidelines for the Inventory of Hazardous Materials (IHM)

The European Union (EU) adopted the EU Ship Recycling Regulation 2013 (Regulation (EU) No. 1257/2013), which entered into force on 30 December 2013. This regulation applies to ships greater or equal to 500 gross tonnes, flying the flag of an EU member or flying the flag of a third country **calling at European ports or anchorages**. The objective of the Regulation is to reduce the negative impacts linked to the recycling of EU-flagged ships, especially in South Asia, without creating unnecessary economic burdens.

The EU SRR is generally aligned with the Hong Kong Convention, restricting or prohibiting the use of hazardous materials including asbestos, ozone-depleting substances, PCBs and anti-fouling compounds and systems. Also in line with the Hong Kong Convention, each new European ship (or a ship flying a flag of the third country calling at EU port or anchorage) will be required to have on board an **Inventory of Hazardous Materials (IHM)** verified by the relevant administration or authority. The EU regulation, however, adds Perfluorooctane Sulfonic Acid (PFOS) to the list of controlled Hazardous Material (in Annex I) and Brominated Flame Retardant HBCDD) to the list of items for the Inventory of Hazardous Materials (in Annex II).

New EU flagged ships (building contract placed on or after **31 December 2018**, the date of application of the Regulation) will need to have on board an IHM **at delivery** while **existing vessels** will need to have on board an IHM **not later than 31 December 2020**.



SHIP RECYCLING

In case however a ship flying the flag of an EU Member State is to be recycled, it will need to develop an Inventory of Hazardous Material, as far as practicable, regardless of the facility to be used for recycling.

As the implementation dates are fast approaching and the task of preparing and obtaining approval for the IHM is rather laborious and time consuming (let alone the fact that third parties such as Charterers, Oil Majors, Insurers etc are already questioning plans for compliance) we strongly recommend the initiation of a Company compliance plan covering all your managed vessels.

To support compliance with HKC and EU SSR, **AMC** can complete a review of the IHM, conduct surveys to verify location of the Hazardous materials on board, develop a compliant IHM and assist you in obtaining approval or Statements of Compliance.



For further guidance on the IHM requirements please contact:

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