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TECHNICAL CIRCULAR

Circular Number: 27

Revision: 2

Page: 1 of 2

Date: 14 May 2020

Inventory of Hazardous Materials - Statement of Compliance

1.0 Introduction

This Technical Circular provides instructions on issuing a Statement of Compliance (SoC) for an Inventory of Hazardous Materials (IHM) under the European Union (EU) Ship Recycling Regulation No 1257/1013 (EU SRR) and the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 (Hong Kong Convention or Convention). It must be read in conjunction with Marine Guideline [2-11-9](#), *Inventory of Hazardous Materials*, and all applicable requirements.

2.0 General Instructions

2.1 On request by the shipowner or Master, an SoC may be issued by the Administrator or an RMI RO after verifying that the IHM, Part I meets the relevant requirements. ROs may conduct this work irrespective of whether they class the vessel. The following minimum requirements apply.

2.1.1 The IHM must be ship-specific and take into account IMO Resolution [MEPC.269\(68\)](#). For an existing ship it must identify, at least, the hazardous materials listed in Appendix I of the Convention or Annex I of the EU SRR, as appropriate.

2.1.2 A plan must be established by the ship describing the visual/sampling check by which the IHM is developed.

2.1.3 Any laboratory used to carry out specific tests must take into consideration the guidance in MEPC.269(68), Appendix 9, and meet the requirements on recognized independent testing laboratories in RMI Technical Circular 1.

2.1.4 The IHM must be properly maintained and updated throughout the ship's operational life. It must reflect the new installations that contain hazardous materials referred to in Appendix II of the Convention or Annex II of the SRR, as appropriate, and relevant changes in the ship's structure and equipment, taking into account the exemptions and transitional arrangements applicable to those materials under international law.

TECHNICAL CIRCULAR

Circular Number: 27

Revision: 2

Page: 2 of 2

Date: 14 May 2020

2.1.5 The IHM and SoC must be written in English.

2.1.6 Separate SoCs must be issued for the EU SRR and Hong Kong Convention.

3.0 Hong Kong Convention – Survey and Certification

3.1 Ships must be surveyed according to Convention Regulation 10. An SoC may be issued after successful completion of:

3.1.1 an initial survey before the ship is put in service; or

3.1.2 a renewal survey not exceeding five years.

The initial and renewal surveys may be harmonized under the Harmonized System of Survey and Certification (IMO Resolution [A.1140\(31\)](#)). The issuance and endorsement of the SoC must conform to Convention Regulation 11.

3.2 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.

3.3 A final survey must be conducted prior to the ship being taken out of service and before the recycling of the ship has started. Per Regulation 11, the initial and final surveys for existing ships are conducted at the same time.

3.4 The SoC must be modeled on the format provided in Convention Appendix 3.

3.5 The validity of an SoC is five years, subject to the conditions set out in Convention Regulation 14. A valid SoC must be converted into an “International Certificate on Inventory of Hazardous Materials” after the entry into force of the Hong Kong Convention and its ratification by the RMI.

4.0 EU SRR—Survey and Certification

4.1 The EU SRR does not establish a period of validity for the SoC, unless so specified by the flag State. The Administrator has determined, after taking into consideration the EMSA guidelines covering port State Control, that the five-year limit is also appropriate for an SoC issued under the EU SRR. This means that the initial, renewal and additional surveys will need to be conducted for RMI ships under the EU SRR.

4.2 An SoC must be modeled on the format provided 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](#), 27 September 2019.
