Subject

Preparation of IHM to be retained onboard the ship according to the EU Regulation on Ship Recycling, and the promotional incentives for examination fee to encourage earlier development of IHM

ClassNK Technical Information

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To whom it may concern

The EU Regulation on Ship Recycling entered into force on 30th December 2013. According to the EU Regulation, EU flagged new ships are required to have an Inventory of Hazardous Materials (IHM) onboard from 31 December 2018 on the latest, and EU flagged existing ships and Non-EU flagged ships that may call at a port or anchorage of EU Member State are required to have an IHM onboard from 31 December 2020. PSC is imposed on both EU Flagged ships and Non-EU flagged ships at the port or anchorage of EU Member States. It will be basically confirmed through PSC whether the IHM onboard the ship is properly maintained and updated, and a valid statement of compliance (SOC) issued by the Flag or the RO is kept onboard. Please be aware that the shipowners should complete to retain the examined IHM and the SOC onboard all the ships applicable by the deadline.

Details of the above are found in our Technical information TEC-0978 (dated on 15 January 2014) and TEC-1051 (dated on 27 October 2015), but, we are informing to the persons concerned again with this technical information so that the necessary preparation of IHM etc. could be re-confirmed since the deadline is approaching,

In particular, with regard to the ships in-service, a considerable period is necessary to prepare an examined IHM since the expert method should be taken for the development of IHM, and it consists of the following steps: 1) Meeting with the shipping company by the expert, 2) Collection of information and investigation of documents and drawing by the expert, 3) Preparation of visual sampling check plan (VSCP) by the expert and review by ClassNK, 4) Onboard visual and sampling check by the expert with ClassNK surveyor's attendance, 5) Sample analysis at the laboratory if applicable, 6) Development of IHM Part I and related documents by the expert based on the onboard visual and sampling check, and 7) Examination of IHM by ClassNK.

Taking into consideration the voyage schedule and the dock schedule for the ships, please plan to prepare the examined IHM and the SOC for the ship by the deadline. It is expected that the requests for experts will concentrate in the period just before the deadline. Situations where preparation cannot proceed as planned are also assumed. Therefore, we would like to recommend shipowners to take earlier response to prepare IHM and SOC for the ships.

(To be continued)

NOTES:

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ClassNK, at the request of shipowners or shipyards under voluntary bases, have ever carried out document review and onboard survey on IHM and issued SOCs to state that the IHM conforms to the IMO guidelines to the Ship Recycling Convention for more than one thousand ships. In commencing this service at the time of 2008, we set an appraisal fee of 500,000 JPY (per one ship) as the regular fee. However, we have ever given a discount of 200,000 JPY off the regular fee in order to promote earlier development of IHM, and charge 300,000 JPY (per one ship).

This promotional incentive was initially planned to be given until the requirement of entry into force of the Ship Recycling Convention was achieved. However, it is assumed that the examination of the IHM will become more generalized in the nearer future, as it is obliged to prepare the IHM according to the EU Regulation on Ship Recycling that was later established. Indeed, in 2017, we issued SOCs to around half of ClassNK newly-registered new ships.

In view of these situations, we have decided that this promotional incentive has completed a certain role. As described in the following table, we would like to notice that this promotional incentive will be terminated on 28 December 2017(the last working day in Japan of ClassNK this year).

Please be aware that, even if the application is made by 28 December 2017 when is within the promotional incentive period, new ships without signed construction contract and existing ship without an agreement on the timing of IHM development between ship owner and expert are out of the scope to accept applications in the same manner as before. We appreciate your kind understanding.

[Clarification of the promotional period]

Current	Revision
Examination of Inventory of Hazardous Materials Basic fee (per 1 ship): 500,000 tax) *However, 300,000 JPY (per 1 ship) as promotional fee for incentives	Examination of Inventory of Hazardous Materials Basic fee (per 1 ship): 500,000 tax) *However, 300,000 JPY (per 1 ship) as promotional fee for incentives if the application is made by 28 December 2017

(To be continued)

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