

Subject

Compliance with the EU Ship Recycling Regulation
- Non-EU flagged vessels

ClassNK

Technical Information

No. TEC-1207
Date 3 September 2020

To whom it may concern

As informed by ClassNK Technical Information No. TEC-0978, 1170 and 1185, EU flagged existing ships and Non-EU flagged ships calling at a port or anchorage of an EU member state shall have on board an approved inventory of hazardous materials (IHM) by 31 December 2020.

For Non-EU flagged ships, a statement of compliance (SOC) shall be issued in accordance with Article 12.6 of the EU Regulation after verification of the IHM by the relevant authorities of a Non-EU country whose flag the ship is flying or an organisation authorised by them, in accordance with the national requirements. According to the EU authority, the SOC shall be issued by or on behalf of the Flag state.

Until now, ClassNK has issued a SOC to the Hong Kong Convention not on behalf of the flag Administration but on our own behalf. As ClassNK has now received authorization and/or instructions from major non-EU flag Administrations, SOC's will be issued in the following manner:

- 1 Ships to which ClassNK is authorised to issue the SOC on behalf of the Administration:
ClassNK issues SOC's to Ship Recycle Convention (HKC-SOC) and Article 12 of the EU regulation (EU12-SOC) on behalf of the Administration.
- 2 Ships to which the SOC may not be issued on behalf of the Administration:
ClassNK continues to issue the SOC to Ship Recycle Convention as before (not on behalf of the Administration) and newly issues the SOC to Article 12 of the EU regulation (EU12-SOC) but not on behalf of the Administration.
- 3 Ships that comply with Article 5 of the EU Regulation voluntarily:
In addition to the above, on a request basis including an on-going verification, ClassNK issues a Statement of Fact (EU5-SOF) to Article 5 of the EU Regulations, for which two substances, PFOS and HBCDD, are required to be included in the IHM in addition to those required under the Hong Kong Convention. (Related to TEC No. 1170)

For ships whose IHM is developed from now on, please refer to TEC No. 1170 and submit an application, so that an SOC will be issued as per the above 1 or 2. For ships with the IHM notation affixed to their classification character (ships to which an SOC is issued not on behalf of the flag Administration), the above 1 or 2 will be applied at the IHM renewal survey conducted in conjunction with the next class special survey.

(To be continued)

NOTES:

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If new SOCs are needed in advance of the expected period of the next class special survey due to the schedule of the visit to EU ports, either of the following ways can be also taken upon request. In this case, fee for issuing each SOC will be charged.

- 1 In cases where major modifications or repairs were conducted:
In cases where, after the last class periodical survey, the ship was modified or repaired involving changes in the type or amount of hazardous substances listed in the inventory, an onboard verification is required.
Please submit an application for an IHM occasional survey to a survey office, describing the necessary SOC. The occasional survey may be conducted in conjunction with a class periodical survey.
- 2 In cases where no major modifications or repairs were conducted:
In cases where no major modifications or repairs were conducted involving changes in the type or amount of hazardous substances listed in the IHM after the last class periodical survey, please submit an application to ClassNK Ship Management Systems Dept.-Environment Section. The latest application form is available on the following website:

URL: https://www.classnk.or.jp/hp/pdf/activities/statutory/shiprecycle/form_app_ihm_e.docx

Please note that the need for the onboard verification depends on the extent of the IHM maintenance onboard. Please contact ClassNK Ship Management Systems Dept.-Environment Section for the detail.

Instructions from non-EU flag Administrations:

Information on instructions from non-EU flag Administrations in relation to the requirement of the EU Ship Recycling Regulation, including the status of the delegation of authority, is available on the following ClassNK website.

URL: <https://www.classnk.or.jp/hp/en/activities/statutory/shiprecycle/index.html>

For information on flag states that are not listed on the website, please contact ClassNK Ship Management Systems Dept.-Environment Section as the authorization may be given on a ship by ship basis.

For any questions about the above, please contact:

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