Subject

Compliance with the Hong Kong Convention (Ship Recycling Convention) / Regulation (EU) No. 1257/2013 on Ship Recycling (EU-SRR)- For Liberian flagged vessels



No. TEC-1349 Date 23 April 2025

To whom it may concern

Regarding compliance with the Hong Kong Convention (Ship Recycling Convention) / Regulation (EU) No. 1257/2013 on Ship Recycling (EU-SRR), the Liberian Administration published Marine Notice POL-016 Rev.03/25, which contains updated instructions. This ClassNK Technical Information provides information on actions required in response to the Marine Notice issued by the Liberian Administration and supersedes ClassNK Technical Information No. TEC-1320.

The main changes from ClassNK Technical Information No. TEC-1320 are underlined.

- 1. A summary of Marine Notice POL-016 Rev.03/25 is as follows:
  - (1) All surveys under the Ship Recycling Convention of all ships in service registered or registering with Liberia, will be conducted by the Administration on or after 1 April 2024, except for Initial surveys for new ships.
  - (2) The Administration requires shipowners with ships calling at any EU port to include the additional materials PFOS and HBCDD in the IHM Part I, in accordance with the requirements applied to EU-flagged ships under the EU Ship Recycling Regulation (EU SRR). A separate Statement of Compliance on IHM for EU SRR will also be issued in addition to the international certificate on Inventory of Hazardous Materials (ICIHM).
  - (3) The Administration requires shipowners with ships calling ports around the world other than EU Ports to have onboard the ICIHM no later than 26 June 2025, or before going for recycling if this is earlier.
  - (4) Statements of Compliance on IHM already issued by authorized RO will continue to remain valid until they expire or until 26 June 2025, whichever is earlier, after which the Administration will issue the ICIHM which may not require an additional shipboard inspection/survey for Statements of Compliance that have not expired, provided the IHM has been maintained and updated as required.
  - (5) The Administration's auditors may conduct the surveys as a stand-alone service, or during the annual safety inspection, and/or ISM/ISPS/MLC audit/inspection. The IHM Part I should be submitted to the Administration for inspection at least two (2) weeks prior to the survey date.

(To be continued)

#### NOTES:

- ClassNK Technical Information is provided only for the purpose of supplying current information to its readers.
- ClassNK, its officers, employees and agents or sub-contractors do not warrant the accuracy of the information contained
  herein and are not liable for any loss, damage or expense sustained whatsoever by any person caused by use of or reliance
  on this information.
- Back numbers are available on ClassNK Internet Homepage (URL: www.classnk.or.jp).

- (6) In preparation for the final survey, IHM Part I, Part II, Part III, and the Ship Recycling Plan should be submitted to the Administration for inspection at least two (2) weeks prior to the survey date.
- (7) The Administration will issue the International Ready for Recycling Certificate (IRRC) to a vessel when it is ready to be recycled.
- 2. In accordance with the Marine Notice published by the Administration, ClassNK will conduct the survey as follows:
  - (1) Initial Surveys at new shipbuilding

ClassNK will continue to carry out IHM Initial Surveys for new ships for the IHM Part I developed by shipyards. ClassNK will issue an Interim ICIHM valid for five (5) months and submit a copy of the following documents to the Administration at the time of completion of the Initial Survey.

- (i) Survey Record
- (ii) IHM Part I on board the ship
- (iii) Interim ICIHM

The Administration will issue the full-term ICIHM based on the submitted documents and ICIHM will be sent to the shipowner directly.

If a ship is expected to call at EU ports, please ensure that a check mark is placed in the "EU Regulation" checkbox on the application form (Application for Classification and Statutory Services during Construction) when submitted.

ClassNK will confirm the assessment of PFOS and HBCDD at the IHM initial survey and will issue an Interim Statement of Compliance for EU SRR valid for five (5) months and submit a copy thereof to the Administration with the above documents, including a copy of the Interim ICIHM.

(2) Surveys other than the above.

Please contact the Administration.

3. Ships that have not obtained IHM-SOC

For ClassNK registered ships that have not obtained IHM-SOC as of 1 December 2023, the following Note (Statutory Survey) has been set out on Survey Status.

Note: The Liberian flagged ship is required to obtain approval of IHM Part I and International Certificate on IHM by 25 June 2025, or before going for recycling if this is earlier.

(To be continued)

Shipowners are kindly requested to obtain approval of the IHM Part I and ICIHM before the deadline. If the ship already has the IHM Part I and IHM-SOC approved/issued by the Administration, you may submit the full-term ICIHM issued by the Administration to ClassNK Green Certification Department, so that the Note will be deleted.

The Notation "IHM" for Liberian flagged vessel is a voluntary Notation assigned upon the owner's request. Should the Notation be requested, please inform the attending ClassNK surveyor during the survey.

Upon request, its attending surveyor will confirm that the vessel is in compliance with the Hong Kong Convention.

Follow the link below to refer to the latest Marine Notice POL-016 for details: https://www.liscr.com/online-library-official-guidance

The latest information on instructions from flag administrations in relation to the requirements of the Ship Recycling Convention, including the status of the delegation of authority, is available on the following page of the ClassNK website.

HOME > Products & Services > Statutory Services > Ship Recycling Convention https://www.classnk.or.jp/hp/en/activities/statutory/shiprecycle/index.html

For any questions about the above, please contact:

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E-mail: recycling@classnk.or.jp (for Ship recycling facility)

#### Attachment:

1. Marine Notice POL-016 Rev.03/25



# THE REPUBLIC OF LIBERIA LIBERIA MARITIME AUTHORITY

**Marine Notice** 

POL-016 Rev. 03/25

TO: ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF MERCHANT SHIPS, AND AUTHORIZED CLASSIFICATION SOCIETIES

SUBJECT: Implementation, Survey and Certification under the Hong Kong Convention and EU Ship Recycling Regulation (EU SRR)

#### **References:**

- (a) Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 Hong Kong Convention
- (b) Resolution MEPC.379(80) 2023 Guidelines for the Development of the Inventory of Hazardous Materials
- (c) Resolution MEPC.222(64) 2012 Guidelines for the Survey and Certification of Ships under the Hong Kong Convention
- (d) Resolution MEPC.211(63) 2012 Guidelines for the Authorization of Ship Recycling Facilities
- (e) Resolution MEPC.196(62) 2011 Guidelines for the Development of the Ship Recycling Plan
- (f) Resolution MEPC.210(63) 2012 Guidelines for Safe and Environmentally Sound Ship Recycling
- (g) Regulation (EU) No 1257/2013 of the European Parliament and of the Council on ship recycling EU Ship Recycling Regulation (EU SRR)
- (h) EMSA Guidance on the Inventory of Hazardous Materials
- (i) Marine Operations Note: 06/2025

Supersedes: Marine Notice POL-016, Rev. 07/24

The following changes have been included:

- 1. Amended relevant sections to indicate that the Administration is issuing a separate IHM SOC for EU SRR for ships calling at EU ports or anchorage;
- 2. Added the form of IHM SOC for EU SRR under Appendix 1A;
- 3. Added a three dates structure under 'Date of Construction' to the form of the International Certificate on IHM and EU SRR Statement of Compliance on IHM.

#### **PURPOSE:**

The purpose of this Marine Notice is to provide guidance on implementing the requirements of the Hong Kong Convention which enters into force on 26 June 2025 and the EU Ship Recycling Regulation (EU SRR), including the survey and certification of ships.

#### **BACKGROUND:**

The Hong Kong Convention was adopted in 2009 to effectively address, in a legally binding instrument, the environmental, occupational health and safety risks related to ship recycling, taking into account the particular characteristics of maritime transport and the need to secure the smooth withdrawal of ships that have reached the end of their operating lives.

On 26 June 2023, Liberia ratified the Hong Kong Convention, thereby fulfilling the criteria for entry into force of the Convention. Upon entry into force on 26 June 2025 or before going for recycling, if this is earlier, the Liberia Maritime Administration (Administration) requires new and existing ships of 500 GT and above to have onboard a valid IHM Part I with an International Certificate on Inventory of Hazardous Materials (IHM) in the format specified in Appendix 1 of this Marine Notice. The objectives of the IHM under the Hong Kong Convention is to document ship-specific information on the actual hazardous materials present on board in order to protect health and safety of the crew, and to protect health and safety of workers at ship recycling facilities and avoid environmental pollution when the ship is going for recycling.

The European Parliament formally adopted the EU SRR on 22 October 2013, which entered into force on 30 December 2013. The EU SRR requires all non-EU-flagged ships of 500 GT and above calling at EU ports or anchorage from 31 December 2020, to have onboard a valid IHM Part I with a Statement of Compliance in the format specified in Appendix 1A of this Marine Notice.

Upon entry into force of the Hong Kong Convention or earlier if requested, the Administration will also issue the International Ready for Recycling Certificate (IRRC) in the format specified in Appendix 2 of this Marine Notice prior to recycling and upon completion of the final survey.

Shipowners with ships calling at ports in the EU are therefore required to develop the IHM Part I for approval prior arrival at any EU port or anchorage. For ships calling at ports outside the EU, shipowners are required to develop the IHM Part I for approval prior to entry into force of the Hong Kong Convention on 26 June 2025, or before going for recycling, if earlier. The IHM Part I shall include the classification of materials according to the IMO guidelines, with the addition of two hazardous materials (Perfluoro octane Sulfonic Acid - PFOS and Brominated Flame Retardant - HBCDD) required by the EU SRR for ships calling at ports in the EU.

#### **APPLICABILITY:**

#### The Hong Kong Convention:

The Convention shall apply to:

- Ships entitled to fly the flag of a Party or operating under its authority;
- Ship Recycling Facilities operating under the jurisdiction of a Party.

The convention does not apply to:

- Warships, naval auxiliary, or other ships owned or operated by a Party and used, for the time being, only on government non-commercial service;
- Ships less than 500GT;
- Ships operating throughout their life only in the waters subject to the sovereignty or jurisdiction of the state whose flag the ship is entitled to fly.

#### The EU Ship Recycling Regulation (EU SRR):

The EU SRR is applicable on or after 31 December 2018 to ships of 500 GT and above engaged on international voyages, registered under the flag of an EU Member State or non-EU flagged ships calling at EU ports or anchorage as follows:

- New EU-flagged ships at delivery (building contract of which is placed on or after 31 December 2018).
- Existing EU-flagged ships by 31 December 2020, or if going for recycling. From 31 December 2018, commercial seagoing EU-flagged ships of 500 GT and above are to be recycled in ship recycling facilities that are in EU List.
- From 31 December 2020, non-EU flagged ships calling at EU ports or anchorage are to carry a verified IHM Part I and Statement of Compliance that includes the additional hazardous materials PFOS and HBCDD.

#### 1.0 **DEFINITIONS:**

Definitions have been taken from the Hong Kong Convention and where necessary, Liberian National interpretations.

- **1.1 Administration** means the Government of the State whose flag the ship is entitled to fly, or under whose authority it is operating.
- 1.2 Competent Authority(ies) means a governmental authority or authorities designated by a Party as responsible, within specified geographical area(s) or area(s) of expertise, for duties related to Ship Recycling Facilities operating within the jurisdiction of that Party as specified in this Convention.
- **1.3 Organization** means the International Maritime Organization.
- **1.4 Committee** means the Marine Environment Protection Committee of the Organization.
- **Ship** means a vessel of any type whatsoever operating or having operated in the marine environment and includes submersibles, floating craft, floating platforms, self-elevating platforms, Floating Storage Units (FSUs), and Floating Production Storage and Offloading Units (FPSOs), including a vessel stripped of equipment or being towed.
- **1.6 Gross tonnage** means the gross tonnage (GT) calculated in accordance with the tonnage measurement regulations contained in Annex I to the International Convention on Tonnage Measurement of Ships, 1969, or any successor convention.

- **1.7 Hazardous Material** means any material or substance which is liable to create hazards to human health and/or the environment.
- **Ship Recycling** means the activity of complete or partial dismantling of a ship at a Ship Recycling Facility in order to recover components and materials for reprocessing and re-use, whilst taking care of hazardous and other materials, and includes associated operations such as storage and treatment of components and materials on site, but not their further processing or disposal in separate facilities.
- **1.9 Ship Recycling Facility** means a defined area that is a site, yard or facility used for the recycling of ships.
- **1.10 Recycling Company** means the owner of the Ship Recycling Facility or any other organization or person who has assumed the responsibility for operation of the Ship Recycling activity from the owner of the Ship Recycling Facility and who on assuming such responsibility has agreed to take over all duties and responsibilities imposed by the Convention.
- **1.11 Existing ship** means a ship which is not a new ship.
- **1.12** New ship means a ship:
  - .1 for which the building contract is placed on or after the entry into force of the Convention; or
  - .2 in the absence of a building contract, the keel of which is laid or which is at a similar stage of construction on or after six months after the entry into force of the Convention; or
  - .3 the delivery of which is on or after 30 months after the entry into force of the Convention.
- **1.13** New installation means the installation of systems, equipment, insulation, or other material on a ship after the date on which the Convention enters into force.
- **1.14** Safe-for-entry means a space that meets the following criteria:
  - .1 the oxygen content of the atmosphere and the concentration of flammable vapours are within safe limits;
  - .2 any toxic materials in the atmosphere are within permissible concentrations; and
  - .3 any residues or materials associated with the work authorized by the Competent person will not produce uncontrolled release of toxic materials or an unsafe concentration of flammable vapours under existing atmospheric conditions while maintained as directed.
- **1.15** Safe-for-hot work means a space that meets the following criteria:
  - .1 a safe, non-explosive condition, including gas-free status, exists for the use of electric arc or gas welding equipment, cutting or burning equipment or
  - .2 other forms of naked flame, as well as heating, grinding, or spark generating operations;

- .3 Safe-for-entry requirements of 1.14 above are met;
- .4 existing atmospheric conditions will not change as a result of the hot work;
- .5 all adjacent spaces have been cleaned, or inerted, or treated sufficiently to prevent the start or spread of fire.
- 1.16 Shipowner means the person or persons, or company registered as the owner of the ship or, in the absence of registration, the person or persons or company owning the ship or any other organization or person such as the manager, or the bareboat charterer, who has assumed the responsibility for operation of the ship from the owner of the ship. However, in the case of a ship owned by a State and operated by a company which in that State is registered as the ship's operator, "owner" shall mean such company. This term also includes those who have ownership of the ship for a limited period pending its sale or handing over to a Ship Recycling Facility.
- **1.17 Statement of Completion** means a confirmatory statement issued by the Ship Recycling Facility that the Ship Recycling has been completed in accordance with this Convention.
- **1.18 Tanker** means an oil tanker as defined in MARPOL Annex I or an NLS tanker as defined in MARPOL Annex II.
- **1.19** Accredited laboratory is a laboratory accredited in accordance with ISO 17025 or an equivalent standard for the purpose of conducting specific tests for hazardous materials included in the Hong Kong Convention including additional materials required under the EU SRR and capable of providing a written report that can be relied upon by all parties.
- **1.20 Hazardous Material** means any material or substance which is liable to create hazards to human health and/or the environment.
- **1.21 Hazardous Material survey** is an investigation to trace and identify the presence or absence of Hazardous Materials contained in the equipment, systems, and/or areas on board a ship and may include review of any relevant documents, visual inspections and sampling.
- **1.22 IHM process** is the whole process of development and maintenance of an IHM throughout the operational life- cycle of the ship. It involves all the steps of developing an IHM including issuing/checking of any relevant documentation (e.g. Material Declarations), sampling and analysis, verification and life-cycle management.
- **1.23 Individual IHM Expert** is a person who has the appropriate training, qualifications and knowledge to conduct hazardous material surveys for the development and maintenance of an IHM. He or she should have experience on ship structure and on handling of HM and sufficient knowledge of how to compile an IHM and of all the relevant international legislation.
- **1.24 IHM Expert Company** is an entity employing or contracting individual IHM experts to conduct any relevant work or task in relation to the IHM process for the purpose of compiling or updating Inventories of Hazardous Materials. The IHM expert company

should use a documented management system and should work on suitable standards, covering the relevant activities of the company.

**1.25 Sampling check** is the taking of samples to identify the presence or absence of HM contained in the equipment, systems, and/or areas on board a ship, by suitable and generally accepted methods such as laboratory analysis.

#### 2.0 COMPLIANCE GUIDANCE

The IHM consists of:

- Part I: Hazardous materials contained in the ship structure or equipment, their location, and approximate quantities, as referred to in Appendices 1 and 2 of the Hong Kong Convention and in Annexes 1 and 2 of the EU SRR for the ships calling at EU ports or anchorage, and clarify that the ship complies with the controls of hazardous materials;
- Prior to recycling:
  - o Part II: Operationally generated wastes; and
  - o Part III: Stores.

Annex 1 to the International Convention on the Control of Harmful Anti-fouling Systems on Ships, 2001 (AFS Convention) (**Resolution MEPC.331(76)**), introduced controls on cybutryne and entered into force on 1 January 2023, which resulted in a consequential revision of the Guidelines for the development of the Inventory of Hazardous Materials, **Resolution MEPC.379(80)** (reference (b)).

In general, the guidelines in **Resolution MEPC.379(80)** provide sufficient information for the development of the IHM in relation to the hazardous materials included in Appendices 1 and 2 of the Hong Kong Convention, as well as an indicative list of these hazardous materials with CAS numbers and respective specific test methods. Therefore, for information on the hazardous materials included in appendices 1 and 2 of the Hong Kong Convention and in annexes 1 and 2 of the EU SRR, reference should be made to the IMO guidelines.

Part I of the IHM shall remain with the ship throughout its operational life and be updated as all new installations enter the ship, as these may potentially contain hazards. The presence of the inventory will then ensure the safety of crewmembers during the ship's operational life and the safety of workers during the recycling process.

The shipowner is responsible for developing Part I of the IHM and should draw upon expert assistance. This is strongly recommended for safety and health protection reasons and in order to have a minimum assurance that the work is carried out by competent personnel, under a quality management system and in accordance with IMO guidelines in **Resolution MEPC.379(80)**. However, such IHM Expert Company should not be the same as the Liberia Maritime Auditor/Inspector or Recognized Organization authorized by the Administration to approve the IHM. The development and maintenance of the IHM should be subject to the principles of independence, quality and accountability.

The following procedure should be followed for determination of Part I of the IHM:

• Collection of necessary information;

- Assessment of collected information;
- Preparation of Visual/Sampling Check Plan (VSCP);
- Onboard Visual/Sampling Check; and
- Preparation of Part I of the IHM and related documentation.

#### 2.1 Maintaining and updating Part I of the IHM during operations

The Hong Kong Convention requires that the shipowner maintain the IHM throughout the operational life of the ship.

If any machinery or equipment is added, removed or replaced or the hull coating is renewed, Part I of the IHM should be updated. Updating is not required if identical parts or coatings are installed or applied.

Part I of the IHM should belong to the ship, and the continuity and conformity of the information should be confirmed, especially if the flag, owner or operator of the ship changes.

#### 2.2 Requirements for ascertaining the conformity of Part I of the IHM

The conformity of the IHM for new ships (or new installations on existing ships) should be ascertained by reference to the Supplier's Declaration of Conformity and the related Material Declarations collected from suppliers at the design and construction stage. To enforce the delivery of Material Declarations, builder's and operator's purchase departments are strongly advised to include related clauses in the contracts with suppliers of equipment, systems and installations.

#### **Material Declaration (MD)**

Suppliers to the shipbuilding industry should identify and declare whether or not the materials listed in Appendices 1 and 2 of the Hong Kong Convention. However, this provision does not apply to chemicals which do not constitute a part of the finished product.

#### Information required in the MD

At a minimum the following information is required in the MD:

- .1 date of declaration:
- .2 MD identification number;
- .3 supplier's name;
- .4 product name (common product name or name used by manufacturer);
- .5 product number (for identification by manufacturer);
- .6 declaration of whether or not the materials listed in Appendices 1 and 2 of the Hong Kong Convention are present in the product above the threshold value stipulated in **reference** (b); and
- .7 mass of each constituent material listed in .6 above.

#### **Suppliers Declaration of Conformity (SDOC)**

The purpose of the Supplier's Declaration of Conformity is to provide assurance

that the related Material Declaration conforms to the information above, and to identify the responsible entity. The SDOC should contain the following:

- .1 unique identification number;
- .2 name and contact address of the issuer;
- .3 identification of the subject of the Declaration of Conformity (e.g. name, type, model number, and/or other relevant supplementary information);
- .4 statement of conformity;
- .5 date and place of issue; and
- .6 signature (or equivalent sign of validation), name and function of the authorized person(s) acting on behalf of the issuer.

For maintaining and updating Part I of the IHM throughout the operational life of the ship, reflecting new installations containing Hazardous Materials listed in Appendix 2 of the Convention, including the additional materials in the EU SRR for the ships calling at EU ports or anchorage, and relevant changes in ship structure and equipment, shipowners should implement the following measures in order to ensure the conformity of Part I of the IHM:

- Management policy to maintain the IHM: Designate a responsible person (ashore or on board);
- Management System to maintain the IHM:
  - o Request of Hazardous Material Information
  - o Review of Collected Information of Hazardous Materials
  - o Development of Revision of the Inventory
  - o Review of Revision and Instruction for Updating Inventory
  - Update of the Inventory on Board
  - Ascertaining the Conformity of the Inventory;
- Continuity of Conformity of the inventory;
- Provide related documents as required for the survey or sale of the ship.

Shipowners may use an IHM Expert Company accepted by the Administration for maintaining and updating the IHM Part I.

#### 2.3 Ships preparing for recycling

Ships destined to be recycled shall:

- .1 only be recycled at Ship Recycling Facilities that are:
  - authorized in accordance with the Convention; and
  - fully authorized to undertake all the ship recycling activities which the Ship Recycling Plan specifies to be conducted by the identified Ship Recycling Facility(ies);
- .2 conduct operations in the period prior to entering the Ship Recycling Facility in order to minimize the amount of cargo residues, remaining fuel oil, and wastes remaining on board;

- .3 in the case of a tanker, arrive at the Ship Recycling Facility with cargo tanks and pump room(s) in a condition that is ready for certification as Safe-for-entry, or Safe-for-hot work, or both, according to national laws, regulations and policies of the Party under whose jurisdiction the Ship Recycling Facility operates;
- .4 provide to the Ship Recycling Facility all available information relating to the ship for the development of the Ship Recycling Plan required by regulation 9 of the Annex to the Convention;
- .5 complete the Inventory required by regulation 5 of the Annex to the Convention (i.e., IHM Part I, II & III); and
- .6 be certified as ready for recycling by the Administration or the Recognized Organization authorized by it, prior to any recycling activity taking place.

Ship Recycling Plan, in compliance with Regulation 9 of the Annex to the Convention and explicitly or tacitly approved by the Competent Authority authorizing the Ship Recycling Facility, shall be submitted to the Administration for inspection and be made available onboard for the final survey by the Administration or authorized Recognized Organization.

#### 3.0 HAZARDOUS MATERIALS SURVEY AND CERTIFICATION

The Administration has informed its Recognized Organizations (RO) that from 01 April 2024, all surveys under The Hong Kong Convention for ships in service registered or registering with Liberia will be conducted by the Administration.

The Hong Kong Convention identifies the following surveys to be performed by the Administration or organizations recognized by the Administration:

#### 3.1 Surveys

**Initial survey**: To verify whether Part I of the IHM has been prepared in accordance with the Hong Kong Convention. Note that there are different requirements for the initial surveys of new ships and existing ships.

#### **Initial survey for new ships:**

- .1 Prior to the initial survey for a new ship, a request for the initial survey should be submitted by the shipowner or the shippard to an authorized Recognized Organization, along with the ship data required for the International Certificate on IHM;
- .2 The request for the initial survey should be supplemented with Part I of the IHM, the MD and SDOC, and all other documents used to develop the IHM;
- .3 The survey should verify that Part I of the IHM identifies the Hazardous

Materials, their location, and approximate quantities, by checking the MD and SDOC, and especially the location of Hazardous Materials is consistent with the arrangements, structure and equipment of the ship, through onboard visual inspection.

#### Initial survey for existing ships

- .1 In the case of an existing ship, an initial survey shall be conducted before the International Certificate on IHM is issued;
- .2 Prior to the initial survey, a request for the initial survey shall be submitted by the shipowner to the Administration, along with the ship data for the International Certificate on IHM;
- .3 The request for an initial survey shall be supplemented with Part I of the IHM:
- .4 Part I of the IHM shall be developed through a visual check and/or sampling check on board the ship, based on the visual/sampling check plan in accordance with **Resolution MEPC.379(80)**, and submitted by the shipowner to the Administration along with supporting information, such as the report of the visual/sampling check and/or MD and SDOC;
- .5 The visual/sampling check plan and Part I of the IHM shall be prepared by an IHM Expert Company in accordance with Resolution MEPC.379(80);
- .6 The survey shall verify that Part I of the IHM identifies the Hazardous Materials, their location and approximate quantities, by checking supporting information such as the report of the visual check and/or sampling check and/or MD and SDOC; the MD and SDOC and especially the location of Hazardous Materials, is consistent with the arrangements, structure and equipment of the ship, through onboard visual inspection;
- .7 The survey shall further verify that the IHM, MD, SDOC and especially the location of Hazardous Materials, is consistent with the arrangements, structure and equipment of the ship, through onboard visual inspection.

**Renewal survey**: Is to be carried out at intervals not exceeding five years. This survey shall verify that Part I of the IHM complies with the requirements of the Convention.

**Additional survey**: Is to be carried out at the request of the shipowner after change, replacement or significant repair of the structure, equipment, systems, fittings, arrangements and materials, which have an impact on the IHM.

**Final survey**: Is to be conducted before a ship is taken out of service and before the recycling of the ship begins. This survey shall verify that:

.1 the Inventory, in addition to the properly maintained and updated Part I, incorporates Part II for operationally generated wastes and Part III for

- .2 the Ship Recycling Plan, as required by regulation 9 of the Annex to the Convention, properly reflects the information contained in the Inventory of Hazardous Materials and contains information concerning the establishment, maintenance and monitoring of Safe-for-entry and Safefor-hot work conditions; and
- .3 the Ship Recycling Facility(ies) where the ship is to be recycled holds a valid authorization in accordance with the Convention.

The Administration may conduct the surveys as a stand-alone service, or during the annual safety inspection (ASI), and/or ISM/ISPS/MLC audit/inspection.

In preparation for the survey, IHM Part I, Part II, Part III, and the Ship Recycling Plan (as applicable) should be submitted to RegsandStandards@liscr.com for inspection at least two (2) weeks prior to the survey date to assist with the onboard survey. For scheduling the surveys, including advancing or extending the date of the ASI and/or ISM/ISPS/MLC audit/inspection, fees associated with the surveys, and any available discounts, please contact Audit@liscr.com.

#### 3.2 Issuance and endorsement of certificates

#### **New ships**

Authorized Recognized Organizations shall issue an Interim International Certificate on IHM for new-building ships registered or registering with Liberia for a period of five (5) months in the format specified in Appendix 1 of this Marine Notice after successful completion of an initial survey conducted in accordance with the paragraph 3.1 above.

Additionally, for new-building ships calling EU ports or anchorage, the Authorized Recognized Organizations shall issue an Interim Statement of Compliance on IHM with a validity of five (5) months in the format specified in Appendix 1A of this Marine Notice after verifying that the IHM Part I includes the additional materials PFOS and HBCDD and upon successful completion of the initial survey.

The Interim International Certificate on IHM, the Interim Statement of Compliance for EU SRR for ships calling at EU ports or anchorage (as applicable) along with the survey report and IHM Part I shall be submitted to the Administration at <a href="mailto:RegsandStandards@liscr.com">RegsandStandards@liscr.com</a>, for issuance of the full term International Certificate on IHM and Statement of Compliance on IHM for EU SRR, as applicable, validity of which shall be not more than 5 years from the date of completion of the survey.

#### **Existing ships**

Statements of Compliance on IHM already issued by authorized Recognized Organizations will continue to remain valid until they expire or until 26 June 2025, whichever is earlier, after which the Administration will issue the International Certificate on IHM, which may not require an additional shipboard inspection/survey for Statements of Compliance that have not expired, provided the IHM has been

maintained and updated as required.

Ships with an IHM Part I and bearing an anti-fouling system that contains cybutryne in the external coating layer of their hulls or external parts or surfaces above 1,000 mg/kg determined by sampling, should update the IHM Part I accordingly to include the presence of cybutryne at the earliest, if applicable. Upon removal of the antifouling system containing cybutryne in accordance with **Marine Notice AFS-01**, the IHM Part I should be updated again and verified by the Administration after removal. A copy of the Anti-Fouling System (AFS) Certificate along with the updated IHM part I should be submitted to the Administration for reissuance of the International Certificate on IHM.

For the issuance of the full-term International Certificate on IHM, the following documentation must be submitted by the Recognized Organization to the Administration prior to 26 June 2025:

- relevant survey report and IHM Part I meeting Resolution MEPC.379(80); and,
- the existing valid Statement of Compliance/International Certificate on IHM.

For ships in service registered or registering with Liberia, from 1 April 2024, the Administration will conduct all surveys under The Hong Kong Convention and will issue the full-term International Certificate on IHM upon completion of the initial/renewal surveys, validity of which shall be not more than 5 years from the date of completion of the survey.

Additionally, for ships in service calling at EU ports or anchorage, the Administration is issuing a Statement of Compliance on IHM for EU SRR after verifying that the IHM Part I includes the additional hazardous materials PFOS and HBCDD.

#### Ships preparing for recycling

For ships proceeding for recycling, the Administration will also issue the International Ready for Recycling Certificate in the format specified in Appendix 2 of this Marine Notice prior to recycling and upon successful completion of the final survey, validity of which shall be not more than three (3) months from the date of completion of the final survey.

#### 4.0 VALIDITY OF THE CERTIFICATES

The International Certificate on IHM/Statement of Compliance on IHM for EU SRR shall cease to be valid in any of the following cases:

- .1 If the condition of the ship does not correspond substantially with the particulars of the certificate, including where the IHM Part I is not properly maintained and updated, reflecting changes in ship structure and equipment, in accordance with the guidelines developed by the Organization.
- .2 Upon transfer of the ship to the flag of another State. If requested within three months

after the transfer has taken place, the Administration will, as soon as possible, transmit to the Administration of the gaining flag State a copy of the certificate carried by the ship before the transfer and, if available, a copy of the relevant survey report.

#### 5.0 REPPORTING REQUIREMENTS

#### 5.1 Initial notification and reporting requirements

The shipowner shall notify the Administration in due time and in writing of the intention to recycle a ship in order to enable the Administration to prepare for the survey and certification required by the Convention.

#### 5.2 Reporting upon completion

When the partial or complete recycling of a ship is completed in accordance with the requirements of the Convention, a Statement of Completion shall be issued by the Ship Recycling Facility and reported to its Competent Authority(ies). The Statement shall be issued within 14 days of the date of partial or completed Ship Recycling in accordance with the Ship Recycling Plan and shall include a report on incidents and accidents damaging human health and/or the environment, if any. The Competent Authority(ies) shall send a copy of the Statement to the Administration.

#### 6.0 INSPECTIONS OF SHIPS BY PORT STATE CONTROL

A ship to which the Convention applies may, in any port or offshore terminal of another Party, be subject to inspection by officers duly authorized by that Party for the purpose of determining whether the ship is in compliance with the Convention. Except as provided in paragraphs below, any such inspection is limited to verifying that there is on board either an International Certificate on Inventory of Hazardous Materials or an International Ready for Recycling Certificate, which, if valid, shall be accepted.

Where a ship does not carry a valid certificate or there are clear grounds for believing that:

- 1. the condition of the ship or its equipment does not correspond substantially with the particulars of the certificate, and/or Part I of the Inventory of Hazardous Materials; or
- 2. there is no procedure implemented on board the ship for the maintenance of Part I of the Inventory of Hazardous Materials;

A detailed inspection may be carried out taking into account guidelines developed by the Organization.

If the ship is detected to be in violation of the Convention, the Party carrying out the inspection may take steps to warn, detain, dismiss, or exclude the ship from its ports.

#### 7.0 DETECTION OF VIOLATIONS

When there is sufficient evidence that a ship is operating, has operated or is about to operate in violation of any provision in the Convention, a Party holding the evidence may request an investigation of this ship when it enters the ports or offshore terminals under the jurisdiction of another Party. The report of such an investigation will be sent to the Party requesting it, to

the Administration of the ship concerned and to the Organization, so that action may be taken as appropriate.

If the ship is detected to be in violation of the Convention, the Party carrying out the inspection may take steps to warn, detain, dismiss, or exclude the ship from its ports. A Party taking such action will immediately inform the Administration and the Organization.

#### 8.0 **VIOLATIONS**

Any violation of the requirements of the Convention is prohibited. If the Administration is informed of such a violation by a Party, it will investigate the matter and may request the reporting Party to furnish additional evidence of the alleged violation.

If the Administration is satisfied that sufficient evidence is available to enable proceedings to be brought in respect of the alleged violation, it shall cause such proceedings to be taken as soon as possible. The Administration shall promptly inform the Party that reported the alleged violation, as well as the Organization, of any action taken. If the Administration has not taken any action within one year after receiving the information, it shall inform the Party which reported the alleged violation, and the Organization, of the reasons why no action has been taken.

## 9.0 REQUIREMENTS FOR IHM EXPERT COMPANIES, RECOGNIZED ORGANIZATIONS AND SHIPOWNERS

#### **IHM Expert Companies**

The IHM for Liberian registered ships should be developed by IHM Expert Companies authorized by the Administration as meeting the criteria listed below and described in Appendix 3 of this Marine Notice.

IHM Expert Companies desiring to be authorized by the Administration for conducting IHM related work described above, including maintaining and updating the IHM Part I on Liberian registered ships should make an application to the Administration at <a href="RegsandStandards@liscr.com">RegsandStandards@liscr.com</a> and be able to demonstrate:

- 1. Independence Include Organization structure and a list of all Individual IHM Experts engaged with a copy of each person's training certification.
- 2. Quality Include a certificate or report verifying that the IHM Expert Company
- 3. has a documented quality system.
- 4. Accountability Include a Statement from the Company with the elements described in Appendix 3.
- 5. Accreditation and Certification Include the following:
  - a) ISO 17020 certification or equivalent standard and ISO 17025 certification or equivalent standard of the laboratories used;
  - b) Approval by an IACS classification society as a service provider for visual/sampling checks and testing of hazardous materials and preparing the IHM; and/or for maintaining and updating the IHM Part I.

IHM Expert Companies desiring to be authorized by the Administration (and IHM Expert

Companies that have already been authorized by the Administration) shall, prior to authorization (and prior to renewal of authorization, as applicable), enter into an authorization and reporting agreement with the Administration. The IHM Expert Company will be directed to the Administration's online portal for making the application and signing the agreement.

#### **Fees**

The Administration will assess the administrative and documentation fees for the review of the application for authorization as an IHM Expert Company for visual/sampling checks/testing/issuing the IHM Part I and/or maintaining & updating of the IHM Part I; and for the issuance of initial Authorization Document valid for a period of three (3) years, and the subsequent renewal of the Document valid for a period of three (3) years as specified in the authorization and reporting agreement signed with the Administration.

#### **Shipowners**

- The responsibility for maintaining, updating and ascertaining the conformity of the IHM Part I lies primarily with the shipowner. They have the duty of exercising due diligence when they appoint or instruct any person or party to conduct hazardous materials surveys, to compile reports or to perform any kind of work within the context of the IHM process. Appointing an IHM Expert Company to compile/update an IHM should, in principle, be considered as exercise of due diligence in order to meet the relevant requirements of the Convention.
- Shipowners desiring to obtain the International Certificate on IHM should use only IHM Expert Companies that have been accepted by the Administration.
- A list of IHM Expert Companies accepted by the Administration may be obtained
  by contacting the Administration at RegsandStandards@liscr.com or on Liberian
  Registry website "List of IHM Expert Companies".

If you have any questions, please contact Technical Department at RegsandStandards@liscr.com or telephone +1 703 790 3434.

\* \* \* \* \*

03/25

#### **APPENDIX 1**

## FORMOF THE INTERNATIONAL CERTIFICATE ON INVENTORY OF HAZARDOUS MATERIALS



### THE REPUBLIC OF LIBERIA

LIBERIA MARITIME AUTHORITY

#### INTERNATIONAL CERTIFICATE ON INVENTORY OF HAZARDOUS MATERIALS

(Note: This certificate shall be supplemented by Part I of the Inventory of Hazardous Materials)

Issued under the provisions of the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 (hereinafter referred to as "the Convention") under the authority of the Government of

#### The Republic of Liberia

by	
(Full designation of the person or organization	authorized under the provisions of the Convention)
Particulars of ship	
Name of ship:	/-Normania
Distinctive number or letters:	
Port of registry:	MONROVIA, LIBERIA
Gross tonnage:	
IMO Number:	OT LIBERTA
Name and address of shipowner:	
IMO registered owner identification number:	
IMO company identification number:	
Date of Construction:	
- Date of building contract:	
- Date on which keel was laid:	
- Date of delivery:	
Particulars of Part I of the Inventory of Haza	rdous Materials
Part I of the Inventory of Hazardous Materials	identification/verification number:

Note 1: Part I of the Inventory of Hazardous Materials, as required by regulation 5 of the Annex to the Convention, is an essential part of the International Certificate on Inventory of Hazardous Materials and must always accompany the International Certificate on Inventory of Hazardous Materials. Part I of the Inventory of Hazardous Materials should be compiled on the basis of the standard format shown in the guidelines developed by the Organization.

#### THIS IS TO CERTIFY:

- 1. that the ship has been surveyed in accordance with regulation 10 of the Annex to the Convention; and
- 2. that the survey shows that Part I of the Inventory of Hazardous Materials fully complies with the applicable requirements of the Convention.

Completion date of survey on w	which this certificate is based:	(dd/mm/yyyy)
This Certificate is valid until	LIBERTY	(dd/mm/yyyy)
Issued at <u>:</u>		
Date (dd/mm/yyyy)	(Signature of duly authorized official i	ssuing the certificate)
	(Seal or stamp of the authority, as appr	opriate)

# ENDORSEMENT TO EXTEND THE CERTIFICATE IF VALID FOR LESS THAN FIVE YEARS WHERE REGULATION 11.6 APPLIES\*

The ship complies with the relevant provisions of the Convention, and this certificate shall, in accordance with regulation 11.6 of the Annex to the Convention, be accepted as valid until (dd/mm/yyyy): ..... Signed: (Signature of duly authorized official) Place: Date: (dd/mm/yyyy) ...... (Seal or stamp of the authority, as appropriate) ENDORSEMENT WHERE THE RENEWAL SURVEY HAS BEEN COMPLETED AND **REGULATION 11.7 APPLIES\*** The ship complies with the relevant provisions of the Convention, and this certificate shall, in accordance with regulation 11.7 of the Annex to the Convention, be accepted as valid until (dd/mm/yyyy): ..... Signed: (Signature of duly authorized official) Place: Date: (dd/mm/yyyy)..... (Seal or stamp of the authority, as appropriate) \* This page of the endorsement at survey shall be reproduced and added to the certificate as considered necessary by the Administration. ENDORSEMENT TO EXTEND THE VALIDITY OF THE CERTIFICATE UNTIL REACHING THE PORT OF SURVEY OR FOR A PERIOD OF GRACE WHERE **REGULATION 11.8 OR 11.9 APPLIES\*** This certificate shall, in accordance with regulation 11.8 or 11.9\*\* of the Annex to the Convention, be accepted as valid until (dd/mm/yyyy): ..... Signed: (Signature of duly authorized official) Place: Date: (dd/mm/yyyy) ...... (Seal or stamp of the authority, as appropriate)

<sup>\*</sup> This page of the endorsement at survey shall be reproduced and added to the certificate as considered necessary by the Administration.

<sup>\*\*</sup> Delete as appropriate.

### **ENDORSEMENT FOR ADDITIONAL SURVEY\***

At an	additional	survey in	accordance	with re	egulation	10 of 1	the A	Annex to	the	Convention,	the
ship w	vas found t	o comply	with the rele	vant pr	ovisions o	of the C	Conv	ention.			

Signed:	
	(Signature of duly authorized official)
Place:	
	(Seal or stamp of the authority, as appropriate)

st This page of the endorsement at survey shall be reproduced and added to the certificate as considered necessary by the Administration.

\*\* Delete as appropriate.

#### **APPENDIX 1A**

## FORM OF THE STATEMENT OF COMPLIANCE ON INVENTORY OF HAZARDOUS MATERIALS



# THE REPUBLIC OF LIBERIA LIBERIA MARITIME AUTHORITY

#### STATEMENT OF COMPLIANCE ON INVENTORY OF HAZARDOUS MATERIALS

(Note: This statement of compliance shall be supplemented by Part I of the Inventory of Hazardous Materials) Issued under the provisions of the Regulation (EU) No.1257/2013 under the authority of the Government of

The Republic of Liberia

### 

.......

.....

### - Date of building contract:

- Date on which keel was laid:
- Date of delivery:

#### Particulars of Part I of the Inventory of Hazardous Materials

IMO registered owner identification number:

IMO company identification number:

Date of Construction:

Part I of the Inventory of Hazardous Materials identification/verification number: .....

Note: In accordance with Article 9(1) of Regulation (EU) No 1257/2013, Part I of the Inventory of Hazardous

Materials is an essential part of the Statement of Compliance on Inventory of Hazardous Materials and shall always accompany the Statement of Compliance on Inventory of Hazardous Materials. Part I of the Inventory of Hazardous Materials should be compiled on the basis of the standard format shown in the guidelines developed by the International Maritime Organization, supplemented, where applicable, by guidelines on aspects specific to Regulation (EU) No. 1257/2013, such as substances listed in that Regulation but not in the Hong Kong Convention.

#### THIS IS TO CERTIFY:

- 1. that the ship has been surveyed in accordance with Article 8 of Regulation (EU) No. 1257/2013; and
- 2. that the survey shows that Part I of the Inventory of Hazardous Materials fully complies with the applicable requirements of that Regulation.

Completion date of survey on which this statement of compliance is based: (do	d/mm/yyyy)
This Statement of Compliance is valid until	(dd/mm/yyyy)
Issued at:	
Date (dd/mm/yyyy) (Signature of duly authorized official issu	uing the certificate)
(Seal or stamp of the authority, as approp	oriate)

# ENDORSEMENT TO EXTEND THE STATEMENT OF COMPLIANCE IF VALID FOR LESS THAN FIVE YEARS WHERE ARTICLE 9(5) APPLIES\*

The ship complies with the relevant provisions of Regulation (EU) No. 1257/2013 on ship recycling, and this statement of compliance shall, in accordance with Article 9(5) of that Regulation, be accepted as valid until (dd/mm/yyyy):
Signed:
(Signature of duly authorized official)
Place:
Date: (dd/mm/yyyy)
(Seal or stamp of the authority, as appropriate)
ENDORSEMENT WHERE THE RENEWAL SURVEY HAS BEEN COMPLETED AND ARTICLE 9(4) APPLIES*
The ship complies with the relevant provisions of Regulation (EU) No 1257/2013 on ship recycling, and this statement of compliance shall, in accordance with Article 9(4) of that Regulation, be accepted as valid until (dd/mm/yyyy):
Signed:
(Signature of duly authorized official)
Place:
Date: (dd/mm/yyyy)
(Seal or stamp of the authority, as appropriate)
ENDORSEMENT TO EXTEND THE VALIDITY OF THE STATEMENT OF COMPLIANCE UNTIL REACHING THE PORT OR ANCHORAGE OF SURVEY OR FOR A PERIOD OF
GRACE WHERE ARTICLE 9(7) OR 9(8) APPLIES*
This statement of compliance shall, in accordance with Article 9(7) or 9(8)** of Regulation (EU)_ No 1257/2013 on ship recycling, be accepted as valid until (dd/mm/yyyy):
Signed:
(Signature of duly authorized official)
Place:
Date: (dd/mm/yyyy)
(Seal or stamp of the authority, as appropriate)

<sup>\*</sup> This page of the endorsement at survey shall be reproduced and added to the statement of compliance as considered necessary by the Administration.

<sup>\*\*</sup> Delete as appropriate.

### ENDORSEMENT FOR ADDITIONAL SURVEY WHERE ARTICLE 9(2) APPLIES $^{st}$

At an additional survey conducted in accordance with Article 8(6) of Regulation (EU) 1257/2013 on ship recycling, the ship was found to comply with the relevant provisions of that Regulation.

Signed:	
	(Signature of duly authorized official)
Place:	
Date: (dd/mm/vvvv)	
(	(Seal or stamp of the authority, as appropriate)

<sup>\*</sup> This page of the endorsement at survey shall be reproduced and added to the statement of compliance as considered necessary by the Administration.

#### **APPENDIX 2**

#### FORM OF THE INTERNATIONAL READY FOR RECYCLING CERTIFICATE



# THE REPUBLIC OF LIBERIA LIBERIA MARITIME AUTHORITY

#### INTERNATIONAL READY FOR RECYCLING CERTIFICATE

(Note: This certificate shall be supplemented by the Inventory of Hazardous Materials and the Ship Recycling Plan)

Issued under the provisions of the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 (hereinafter referred to as "the Convention") under the authority of the Government of

The Republic of Liberia

### by ...... (Full designation of the person or organization authorized under the provisions of the Convention) Particulars of the Ship Name of ship: Distinctive number or letters: Port of registry: MONROVIA, LIBERIA Gross tonnage: IMO Number: Name and address of shipowner: IMO registered owner identification number: IMO company identification number: Date of Construction: Date of building contract: Date on which keel was laid: Date of delivery:

Particulars of the Ship Recycling Facility(ies)		
Name of Ship Recycling Facility		
Distinctive Recycling Company identity number	*	
Full address		
Date of expiry of DASR		
* This number is based on the Document of Auth	norization to conduct Ship Recycling (DASR)	
Particulars of the Inventory of Hazardous Mate	rials	
Inventory of Hazardous Materials identification/	verification number:	
the Convention, is an essential part of the and must always accompany the International	ials, as required by regulation 5 of the Annex to the International Ready for Recycling Certificate national Ready for Recycling Certificate. The be compiled on the basis of the standard format Organization.	
Particulars of the Ship Recycling Plan		
Ship Recycling Plan identification/verification no	ımber:	
	d by regulation 9 of the Annex to the Convention, eady for Recycling Certificate and must always ecycling Certificate.	
THIS IS TO CERTIFY:		
1 that the ship has been surveyed in acc Convention;	ordance with regulation 10 of the Annex to the	
<ul><li>2 that the ship has a valid Inventory of Ha</li><li>5 of the Annex to the Convention;</li></ul>	azardous Materials in accordance with regulation	
contained in the Inventory of Hazardo	by regulation 9, properly reflects the information ous Materials as required by regulation 5.4 and ablishment, maintenance and monitoring of Safeons; and	
4 that the Ship Recycling Facility(ies) authorization in accordance with the Co	where this ship is to be recycled holds a valid onvention.	
This certificate is valid until	(dd/mm/yyyy)	
Issued at		
(Place of issue of certificate)		

(dd/mm/yyyy)(Date of issue)	(Signature of duly authorized official issuing the certificate)
(Date of issue)	(Signature of daily duinorized official issuing the certificate)
	(Seal or stamp of the authority, as appropriate)
REACHING THE PORT OF TH	END THE VALIDITY OF THE CERTIFICATE UNTIL HE RECYCLING FACILITY FOR A PERIOD OF GRACE
WHER	E REGULATION 14.5 APPLIES*
This certificate shall, in accordance accepted as valid for a single point	e with regulation 14.5 of the Annex to the Convention, be to point voyage
from the port of:	
to the port of:	
Signed:	OVE OF TABLER OF THE OWNER.
(Sign	nature of duly authorized official)
Place:	

(Seal or stamp of the authority, as appropriate)

Date: (dd/mm/yyyy).....

\*This page of the endorsement shall be reproduced and added to the certificate as considered necessary by the Administration.

#### **APPENDIX 3**

In order to be accepted by the Administration to conduct visual/sampling checks and testing of hazardous materials and preparing the IHM; and/or updating and maintaining the IHM as may be required by the shipowner, the IHM Expert Company shall, as applicable, be able to demonstrate:

#### 1. Independence

- that the Individual IHM Experts they engage are able to exercise personal integrity in the performance of their duties.
- that anyone involved in the IHM process including the Individual IHM Experts exercise impartiality and objectivity in all work conducted.
- independence from the authorized Recognized Organization responsible for the verification of the IHM on behalf of the Administration. In this regard, conflicts of interest between the IHM Expert Company developing and/or maintaining & updating the IHM and the Recognized Organization verifying and approving the IHM on behalf of the Administration should be prevented.

#### 2. Quality

- that the persons involved in the IHM process are able to exercise a high level of professional competence in the performance of their duties.
- the work of any person or party involved in the IHM process should be of the highest possible quality and in compliance with the requirements of any applicable international legislation.
- application of a documented quality management system and quality controls to ensure the credibility of the IHM process for the development or maintenance of the Inventory.

#### 3. Accountability

- any person or party involved in the IHM process should have a clear understanding of the duties and responsibilities he/she/it assumes in this process.
- the persons or parties involved in the IHM process should keep records of the hazardous materials surveys performed. Written records should be kept to the extent possible. Every person involved in the IHM process may be held liable in case of fault or gross negligence in the execution of his/her duties. Every party involved in the IHM process may also be held liable in case of fault or gross negligence of any of its employees.
- the persons involved in the IHM process should exercise due professional care in

conducting and supervising the respective activities and in preparing related reports. They should use their professional judgment when exercising their duties during the IHM process.

#### 4. Accreditation and Certification

- engage Individual IHM Experts who are adequately trained and qualified for development of IHM by visual/sampling check and testing; and/or maintaining and updating the IHM.
- implement quality processes and procedures preferably in accordance with ISO 17020 or any equivalent standard covering all the relevant activities of the company.
- use laboratories to carry out specific tests that are accredited in accordance with ISO 17025 or an equivalent standard for the purpose of conducting specific tests for hazardous materials included in appendices 1 and 2 of the Hong Kong Convention and annexes 1 and 2 of the EU SRR.
- approved by an IACS classification society as a service provider for visual/sampling checks, testing of hazardous materials and preparing the IHM; and/or maintaining and updating the IHM.