



A BUREAU VERITAS
GROUP COMPANY

INSIGHT - July 2020

ARE YOU PREPARED FOR IHM COMPLIANCE?

TMC's Lalinda Namalarachchi and Charles Yuen explain what you need to know and how we can help you achieve compliance ahead of the 31st December 2020 deadline.



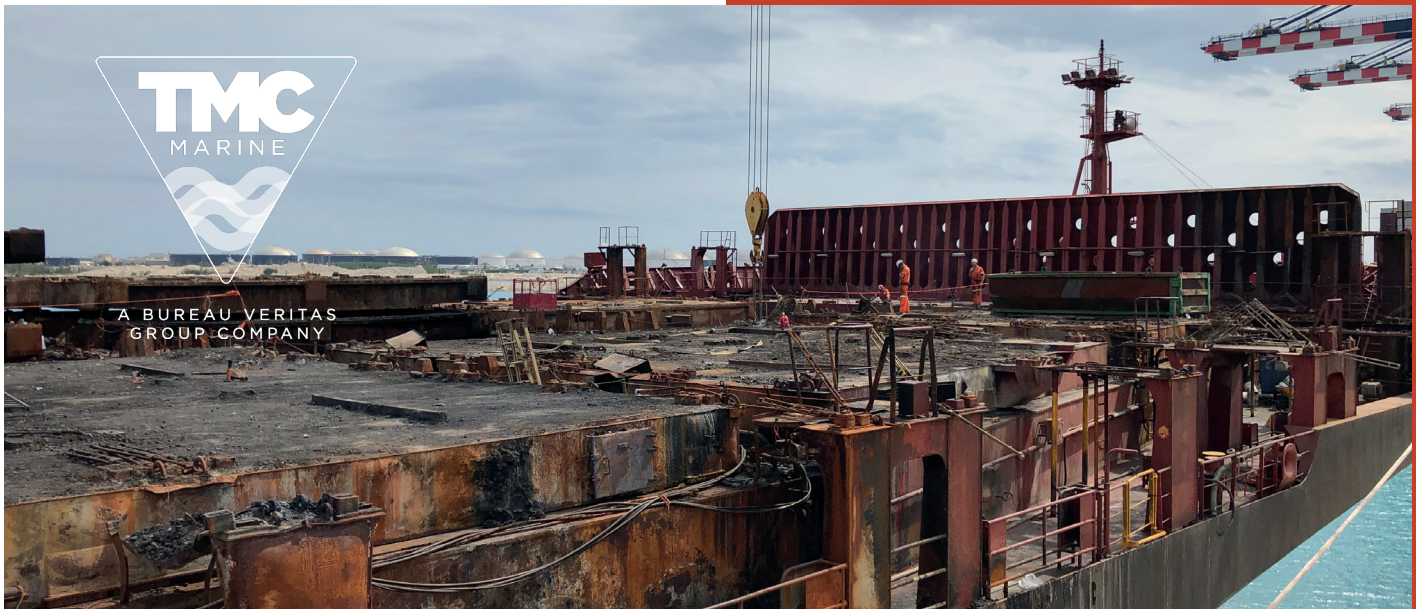
Lalinda writes “Every year, around 1,000 large ships reach the end of their useful life and are sent to scrap. Historically the majority of this work has taken place in dangerous, polluting conditions. Owners are now faced with complying with EU Ship Recycling regulations and preparing for future IMO requirements for EU-flagged existing ships and non-EU ships trading to EU ports. With the deadline being less than six months away, now is the time to act!”

THE REGULATIONS

The majority of ships today are demolished in South Asia, mainly by grounding ships on beaches and dismantling them there, a practice known as “beaching”. This is a typically low-cost, but labour intensive, dangerous and polluting activity that has rightly drawn international censure.

In 2009, the International Maritime Organisation (IMO) introduced the Hong Kong International Convention for





the Safe and Sound Recycling of Ships (HKC). This instrument covers the design, construction, operation and preparation of ships, to facilitate sustainable ship recycling without compromising safety and operational efficiency. The European Ship Recycling Regulation (EU SRR – Regulation EU N°1257/2013) closely follows the text of the HKC and is designed to facilitate early adoption of the Convention.

Under the EU Regulation, from the 31st of December 2020 all EU flagged and non-EU flagged vessels that call at a port or anchorage in an EU member state must have an Inventory of Hazardous Materials (“IHM”) on board.

DO THE REQUIREMENTS APPLY TO ME?

All new and existing ships of 500 GT and above, either flying an EU Member State flag, or calling at an EU port, must comply with the EU SRR. This applies to all types of vessel, including floating craft, self-elevating platforms, floating installations such as FSUs and FPSOs, together with ships stripped of equipment or being towed.

Current estimates point to there being about 50,000 vessels which will be impacted by the regulation, including 22,000 which regularly call at an EU port.

WHAT DO I NEED TO DO TO COMPLY?

The main focus of the EU SRR is the preparation of an Inventory of Hazardous



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Materials (IHM). The IHM is a document which lists, in a standard format, all hazardous materials used in construction materials and/or equipment and which represent a potential risk to people or the environment. These include asbestos (or asbestos containing materials), heavy metals and ozone-depleting substances. The IHM details the location(s)



**PLEASE REMEMBER
THAT THE
DEADLINE FOR IHM
COMPLIANCE IS THE
31 DECEMBER 2020.**



and quantities of all hazardous materials. All EU-flagged vessels must carry an IHM on board, and be issued with a corresponding International Certificate of Inventory of Hazardous Materials (ICIMH), or Statement of Compliance (SoC) for non-EU flagged ships docking in EU ports. In addition, the installation or use of certain hazardous materials will be prohibited or restricted (e.g. asbestos, ozone-depleting substances, polychlorinated biphenyls).

Finally, before the vessel's ultimate voyage to a recycling facility, a specific Ship Recycling Plan (SRP) must be prepared. EU-flagged ships can only be recycled at a shipyard certified and compliant to EU standards.

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HOW TMC CAN HELP YOU TO DEVELOP YOUR IHM

TMC has teams of in-house IHM experts based in the UK and Singapore who are able to attend on board vessels at short notice to conduct the necessary inspection

and sampling process that is key to the development of each IHM. Our operations conform to best-practice COVID-19 safeguards ensuring that risks to both the crew and our inspectors are minimised throughout. Safety is our watchword.

Even in view of current travel restrictions, we are still able to conduct surveys in most ports of the world by liaising with our wider group's pool of IHM experts. Contact us today for a quote.

Through use of the industry leading PRAXIS software, developed by our parent group (Bureau Veritas), significant efficiencies are attained in producing the IHM. This tool is then also accessible to the ship owner so that it can be used for maintenance of the IHM throughout the life of the vessel. Consider us as your partner not as a onetime service provider.

Our work is not limited to BV Classed vessels. We commit to an IHM Part 1 product that is of a standard acceptable to all IACS member classification societies.

We recognise that it is paramount for vessel operators to maintain their schedules and prevent any delay. We are able to offer solutions for those circumstances when a vessel's port call does not allow sufficient time to carry out a normal duration IHM physical inspection and sample process.

The Inventory of Hazardous Materials (IHM) compliance deadline is fast approaching. Please remember that the deadline for IHM compliance is the 31st of December 2020.

We strongly recommend that our clients are proactive as the demand for quality IHM services will almost certainly increase during the coming months of 2020.

Contact Lalinda or Charles today to discuss your IHM needs and arrange for an inspection.

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