



# Maritime Circular No.56

To:

**Ship-Owners / Managers / Operators /Charterers, Registration Officers (RegOffs), Recognised Organisations (ROs), SLMARAD Departments (All)**

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Subject:

**Implementation of the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 – Inventory of Hazardous Materials (IHM)**

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Date:

**17<sup>th</sup> October 2025**

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References:

**Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 – The Hong Kong Convention**

**Resolution MEPC.269(68) - 2015, Guidelines for the Development of the Inventory of Hazardous Materials**

**Resolution MEPC.196(62) – 2011 Guidelines for the Development of the Ship Recycling Plan**

**Resolution MEPC.211(63) – 2012 Guidelines for the Authorization of Ship Recycling Facilities**

**Resolution MEPC.222(64) – 2012 Guidelines for the Survey and Certification of Ships under the Hong Kong Convention**

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## **Purpose**

This Circular provides guidance on the implementation of the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 (HKC), which enters into force on the 26<sup>th</sup> of June 2025. It outlines the requirements for the development, certification, and maintenance of the Inventory of Hazardous Materials (IHM) for ships of 500 gross tonnage (GT) and above.

## **Background**

The Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 (HKC) was adopted by the International Maritime Organization (IMO) to address growing concerns over the environmental and occupational health risks associated with ship recycling. The Convention establishes a comprehensive regulatory framework to ensure that ships, when dismantled at the end of their operational lives, are recycled in a safe, environmentally sound, and responsible manner.

Applicable to ships of 500 gross tonnage (GT) and above as well as ship recycling facilities under the jurisdiction of Parties to the Convention, the HKC mandates specific requirements throughout the lifecycle of a ship. These include the preparation and maintenance of an Inventory of Hazardous Materials (IHM), compliance with designated survey and certification procedures, and adherence to detailed protocols for ship recycling.

## **Definitions**

'Hazardous Material' means any material or substance which is liable to create hazards to human health and/or the environment.

"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.

"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.

"Ship Recycling Facility" means a defined area that is a site, yard or facility used for the recycling of ships.

"New ship" means a ship:

- .1 for which the building contract is placed on or after the entry into force of this 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 this Convention; or
- .3 the delivery of which is on or after 30 months after the entry into force of this Convention.

## Application

1. The Convention applies to:
  - 1.1. New ships of 500 GT and above: Must have an IHM onboard and be certified upon delivery.
  - 1.2. Existing ships of 500 GT and above: Must develop and maintain an IHM no later than five years after the entry into force of the Convention (i.e., by 26 June 2030) or before going for recycling, whichever comes first. The initial and renewal surveys should be harmonized with the surveys required by other applicable statutory instruments.
  - 1.3. Ships destined for recycling of 500 GT and above: Must have an IHM (including Parts I, II, and III) and a Ready for Recycling Statement of Compliance prior to recycling.
2. This Circular does not apply to:
  - a. Any warships, naval auxiliary, or other ships owned or operated by a state and used, for the time being, only on government non-commercial service.
  - b. Ships of less than 500 GT.
3. The IHM shall be ship specific and developed in accordance with MEPC.269(68) and shall be verified by a Recognized Organization (RO) as per the requirements of relevant resolutions and regulations. The official language to be used should be English. The Inventory shall consist of 3 parts as follows:
  - a. Part I: List of hazardous materials contained in ship structure or equipment, their location and approximate quantities and referred to the Appendices 1 and 2 of the Convention. This part needs to be properly maintained and updated throughout the operational ship's life, reflecting new installations containing Hazardous Materials listed in Appendix 2 and relevant changes in ship structure and equipment.
  - b. Part II: List of operationally generated wastes onboard; this part is to be incorporated in the Inventory prior to recycling.
  - c. Part III: Stores; this part is to be incorporated in the Inventory prior to recycling.

4. The responsibility for maintaining, updating and ascertaining the conformity of Part I of the IHM lies primarily with the shipowners. If any changes are made as per Regulation 5.3 of the Convention, Part I of the IHM should be updated accordingly.
5. Sierra Leonean vessels are subject to the following surveys:
  - a. an initial survey before the ship is put in service, or before the Statement of Compliance on Inventory of Hazardous Materials is issued. This survey shall verify that Part I of the Inventory required by regulation 5 is in accordance with the requirements of the HK Convention;
  - b. a renewal survey at intervals specified by the Administration, but not exceeding five years. This survey shall verify that Part I of the Inventory of Hazardous Materials required by regulation 5 complies with the requirements of the HK Convention
  - c. an additional survey, either general or partial, according to the circumstances, may be made at the request of the shipowner after a change, replacement, or significant repair of the structure, equipment, systems, fittings, arrangements and material. The survey shall be such as to ensure that any such change, replacement, or significant repair has been made in the way that the ship continues to comply with the requirements of this Convention, and that Part I of the Inventory is amended as necessary; and
  - d. a final survey prior to the ship being taken out of service and before the recycling of the ship has started. This survey shall verify that:
    - i. the Inventory of Hazardous Materials as required by regulation 5.4 is in accordance with the requirements of this Convention taking into account the guidelines developed by the Organization;
    - ii. the Ship Recycling Plan, as required by regulation 9, properly reflects the information contained in the Inventory of Hazardous Materials as required by regulation 5.4 and contains information concerning the establishment, maintenance and monitoring of Safe-for-entry and Safe-for-hot work conditions; and
    - iii. the Ship Recycling Facility(ies) where the ship is to be recycled holds a valid authorization in accordance with this Convention.
6. Ships destined for recycling in a recycling facility authorized under the Hong Kong Convention and listed in the IMO's database of approved facilities, shall have onboard a Ready for Recycling Statement of Compliance which shall be issued by the RO upon successful completion of the final survey. The Ready for Recycling Statement of Compliance shall be supplemented by the inventory of Hazardous Materials and the ship recycling plan.
7. Recognized Organizations authorized to carry out the verification of IHM and issue the Statement(s) of Compliance are:
  - Alpha Ship Classification (CLASSAS)
  - American Bureau of Shipping (ABS)
  - Asia Shipping Certification Services (ASCS)
  - Bureau Veritas (BV)
  - China Classification Society (CCS)
  - Dromon Bureau of Shipping (DBS)
  - Foresight Ship Classification (FSClass)

- International Naval Surveys Bureau (INSB)
- Korean Register of Shipping (KRS)
- Lloyd's Register (LR)
- Maritime Lloyd (ML)
- New United Marine Certification Services LT (NUMS)
- Overseas Marine Certification Services Inc. (OMCS)
- Phoenix Register of Shipping S.A (PHRS)
- RINA Services S.p.A. (RINA)
- Russian Maritime Register of Shipping (RMRS)
- Sing Lloyd (SGL)

8. Any other Recognized Organization that wishes to be authorized by the Administration shall submit the below documentation:
- a. Procedure for survey, verification and certification of IHM
  - b. IHM Survey report Checklist
  - c. Template of Statement of Compliance on Inventory of Hazardous Materials
  - d. Template of Ready for Recycling Statement of Compliance
  - e. Procedure for approval and oversight of IHM Expert companies

For additional information please contact SLMARAD at [info@slmarad.com](mailto:info@slmarad.com)

#### Revision Status

Date	Revision	Comments - Changes
25/06/2025	0	Initial – Adopted
14/07/2025	1	Amended paragraph 7
17/10/2025	2	Amended paragraph 7