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THE EU SHIP RECYCLING REGULATION – COMING INTO GENERAL APPLICATION ON 31 DECEMBER 2018

December 2018

The EU Ship Recycling Regulation (EU SRR) is coming into general application on 31 December 2018. Additional requirements are imposed to any new EU-flagged vessel and vessels under EU-flag going for recycling. These measures are subject to PSC and flag state inspections effective from 2019. This statutory news provides you with a summary of the EU SRR (1257/2013) and recommendations of how to manage the Inventory of Hazardous Materials (IHM) process.

General overview
New vessels flying the flag of an EU member state are required to have on board a certified IHM (Inventory Hazardous Material) starting 31 December 2018. This means that vessels with building contracts signed after this date shall have the IHM certificate in the specifications.

All EU-flagged vessels to be recycled after 31 December 2018 will be required to have a Ready for Recycling Certificate, which means, among others, these vessels shall only be sent to recycling facilities included in the European List of Ship Recycling Facilities (EU List).

For vessels in operation and flying the flag of an EU member state, the certified IHM is required starting 31 December 2020.

It should be noted that the EU SRR also affects non-EU-flagged vessels, since vessels flying a third-country flag (non-EU flag) calling at a port or anchorage of an EU member state shall have a certified IHM starting 31 December 2020.

How to maintain the IHM
An IHM maintenance procedure should be implemented, including the assignment of a qualified designated person whose duties should be incorporated in the ship owner’s quality management system. An example of such a procedure can be provided by DNV GL upon request.

If any non-identical or new machinery or equipment is added to, removed or replaced, or the hull coating is renewed, the IHM must be updated by collection of suppliers’ declarations. Please note that loosely fitted equipment and spare parts are not covered by IHM Part I.

Our maritime Academy offers a four-day HazMat Expert training course to qualify IHM experts.

The IHM certification process
The IHM certification process can be summarized as follows: IHM preparation -> Document approval by class -> Class survey -> Certificate issuance.
The shipowner may contract a competent third-party company (a so-called HazMat Expert) to prepare the IHM, which involves document collection, on-board sampling check, and laboratory analysis. A list of DNV GL-approved HazMat Expert companies is displayed on our ship recycling webpage.

On average, the entire process may take up to three months; therefore, an immediate IHM compliance program is highly recommended.

The digital solution for IHM processes
The EU SRR IHM guidance suggests using a software tool to support the IHM development and maintenance process, as well as the management of all the relevant documents, information and data. DNV GL’s smart IHM app, IHM Green Server (IGS), fully covers this purpose. Users of My Services on the DNV GL Veracity platform can find the IGS application under “My Services”.

Recommendations
Recommendations to ship owners and operators:
- Add IHM and/or class notation “Recyclable” as requirement in your new building orders.
- Start with IHM certification for the vessels in service now.
- Instruct suppliers to provide suppliers’ declarations and implement the IHM maintenance procedure for the existing IHM.
- Choose only EU List recycling facilities when scrapping EU-flagged vessels.

An external webinar will be organized in 1Q 2019 on the topic of recycling. More information will follow in due course.

References
- DNV GL ship recycling webpage - providing relevant regulation documents, useful forms, and technical updates on recycling.
- DNV GL approved HazMat Expert courses – please use our Academy’s course finder by searching for “HazMat”.
- European List of Ship Recycling Facilities (EU List).

CONTACT
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