



TUVALU SHIP REGISTRY

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MARINE CIRCULAR

MC-4/2025/1

07/2025

FOR: Ship Owners, Ship Managers, Ship Operators, Ship Masters, Ship Officers, Recognized Organizations

SUBJECT: IMPLEMENTATION OF INVENTORY OF HAZARDOUS MATERIALS (IHM)

DEFINITIONS:

The following abbreviations stand for:

- “EU” – European Union
- “EMSA” – European Maritime Safety Agency
- “GT” – Gross Tonnage in accordance to ITC 69
- “HKC, 2009” – The Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009
- “IHM” – Inventory of Hazardous Materials
- “ITC 69” – International Convention on the Tonnage Measurement of Ships, 1969
- “PSC” – Port State Control
- “RfRC” – Ready for Recycling Certificate
- “RO” – Recognized Organization as defined by IMO Resolution A.789(19)
- “SoC-IHM” – Statement of Compliance on Inventory of Hazardous Materials
- “SRR” – Ship Recycling Regulation

The term “Administration” shall mean the Tuvalu Ship Registry.

REFERENCES:

- Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009
- Ship Recycling Regulation No. 1257/2013 (EU SRR)
- Resolution MEPC.269(68) Guidelines for the Development of the Inventory of Hazardous Materials
- Resolution MEPC 222(64) Guidelines for the Survey and Certification of Ships under the Hong Kong Convention

PURPOSE:

This circular provides information relating to the implementation of the HKC, 2009, to ships calling at a port or anchorage of any country of the EU and providing instructions on issuance of SoC-IHM and Part I of the IHM.

BACKGROUND:

- a) The Hong Kong Convention was adopted in 2009 to effectively address the environmental, occupational health and safety risks related to ship recycling. Upon entry into force, the HKC, 2009 will require new ships and existing ships of 500 GT and above, to have onboard a valid International Certificate of Compliance on IHM which documents 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 works at ship recycling facilities and avoid environmental pollution when the ship is going for recycling.

- b) The European Parliament formally adopted the EU SRR on 22 October 2013 which subsequently 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; from 31 December 2022, to have onboard a valid SoC-IHM.
- c) To meet the requirements of the EU SRR, there should be a reference in the SoC stating that the IHM has been developed to cover the requirements of the EU SRR.

APPLICATION:

Although Tuvalu has yet to accede to the HKC, 2009, this circular is applicable to the following Tuvalu-flagged vessels of 500 GT and above:

- i) **New vessels:** Vessels built on or after **26 June 2025** must be delivered with an approved IHM and a valid SoC-IHM.
- ii) **Calling States:** All Tuvalu flagged vessels intending to call a State party to the HKC, 2009 must have a SoC-IHM (Part I) before arriving in these States.
- iii) **Existing vessels:** All existing vessels subject to the HKC, 2009 must comply and be certified under the HKC, 2009 provisions by 26 June 2025. After this date, ships preparing for recycling must carry a valid International RfRC issued by the RO responsible for the SoC-IHM.

By **25 June 2030** (or earlier, if the ship is scheduled for recycling before that date), all existing ships must have an approved IHM Part I, II & III, developed in accordance with MEPC.379(80), and hold valid SoC-IHM.

GENERAL INSTRUCTIONS:

1. On request by the shipowner or ship manager or Master, a SoC-IHM may be issued by an approved RO. The following minimum requirements apply when seeking the issuance of the SoC-IHM.
 - 1.1. The IHM must be ship-specific and take into consideration IMO Resolution MEPC.269(68). For an existing ship it must identify, at least, the hazardous materials listed in Appendix I of the Convention or Annex I of the EU SRR, as appropriate.
 - 1.2. A plan must be established by the ship describing the visual/sampling check which the IHM is developed.
 - 1.3. A laboratory used to carry out specific tests must take into consideration the guidance in MEPC.269(68), Appendix 9.
 - 1.4. The IHM must be properly maintained and updated throughout the ship's operational life. It must reflect the new installations that contain hazardous materials referred to in Appendix II of the Convention or Annex II of the SRR, as appropriate, and relevant changes in the ship's structure and equipment, taking into account the exemptions and transitional arrangements applicable to those materials under international law.
 - 1.4.1. The IHM & SoC-IHM must be written in English.
 - 1.4.2. Separate SoCs-IHM must be issued for the EU SRR and HKC, 2009.
2. HKC, 2009 – Survey & Certification
 - 2.1. Ships must be surveyed according to HKC, 2009 Regulation 10. A SoC-IHM may be issued after successful completion of:
 - 2.1.1. An initial survey before the ship is put into service; or
 - 2.1.2. A renewal survey not exceeding five years.

The initial and renewal surveys must be harmonized under the Harmonized System of Survey and Certification. The issuance and endorsement of the SoC must conform to HKC, 2009 Regulation 11.

- 2.2. An additional survey may be conducted at the request of the shipowner to ensure that any change, replacement, or significant repair made to the structure, equipment, systems fittings, arrangements and materials continues to comply with the HKC, 2009 requirements.
- 2.3. A final survey must be conducted prior to the ship being taken out of service and before the recycling of the ship has started. In accordance with HKC, 2009 Regulation 11, the initial and final surveys for existing ships are conducted at the same time.
- 2.4. The SoC must be modeled on the format provided in HKC, 2009 Appendix 3.
- 2.5. The validity of the SoC-IHM is five years, subject to the conditions set out in HKC, 2009 Regulation 14.

3. EU SRR – Survey & Certification

- 3.1. The EU SRR does not establish a period of validity for the SoC-IHM, unless so specified by the flag State. The Administration has determined, after taking into consideration the EMSA Guidelines covering PSC, that the five years limit is also appropriate for an SoC-IHM issued under the EU SRR. This means that the initial, renewal and additional surveys will need to be conducted for Tuvalu-flagged vessels under the EU SRR.
- 3.2. An SoC-IHM must be modeled on the format provided in Annex 3 of the EMSA document – Guidance on inspection of ships by the port state in accordance with Regulation (EU) 1257/2013 on ship recycling, inspections from the EU port States to enforce provisions of the ship recycling Regulation, of 27 September 2019.

Yours sincerely,

Deputy Registrar
Tuvalu Ship Registry