



**Title:** INVENTORY OF HAZARDOUS MATERIALS - SURVEY AND CERTIFICATION

**To:** Deputy Registrars, Ship Owners, ISM Operators, Recognized Organizations, Recognized Security Organizations, Shipping Agents, General Safety Inspectors

**MMN Superseded:** [MMN-20-004](#) (27 May 2020)

**Revision No.:** 1

**Issuance Date:** 23 September 2024

## 1. REFERENCE

- Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 – The Hong Kong Convention.
- 2012 Guidelines for the Survey and Certification of Ships under the Hong Kong Convention adopted by Resolution MEPC.222(64).
- 2015 Guidelines for the Development of the Inventory of Hazardous Materials, adopted by Resolution MEPC.269(68).
- European Union Ship Recycling Regulation (EU-SRR), adopted by the European Union Regulation No. 1257/2013.
- Guidance on the Inventory of Hazardous Materials Published by EMSA.

## 2. INTRODUCTION

2.1 The Hong Kong Convention (HKC) aims to ensure that ships, when they reach the end of their operational lives and are recycled, do not pose unnecessary risks to human health or the environment. The primary goal of the Inventory of Hazardous Materials (IHM) is to provide a comprehensive record of hazardous substances present on board ships. This documentation serves two essential purposes: safeguarding the health and safety of seafarers and recycling yard workers, and preventing environmental pollution during the recycling process. By identifying and documenting hazardous materials such as asbestos, heavy metals, hydrocarbons, and ozone-depleting substances, the IHM enables recycling facilities to manage these materials safely and make informed decisions about their handling.

2.2 The Hong Kong Convention will enter into force on **26 June 2025**, and compliance with its provisions will be mandatory for all relevant vessels.

## 3. PURPOSE

3.1. The International Merchant Marine Registry of Belize (IMMARBE) has issued this notice to provide clear guidance to Ship Owners, ISM Operators and Recognized Organizations regarding compliance with the Hong Kong Convention. This notice outlines the requirements for the survey and certification of the Inventory of Hazardous Materials



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(IHM) as mandated by the Convention. It aims to ensure that all relevant stakeholders understand their responsibilities and the procedures necessary to meet the Convention's requirements effectively.

3.2. The inventory consists of three parts:

- Part I: Materials contained in ship structure or equipment
- Part II: Operationally generated wastes, and
- Part III: Stores

#### 4. GENERAL PROVISIONS

4.1. Article 3 of the Hong Kong Convention requires that all new ships and existing ships of 500 gross tonnes or more, engaged on international voyages, must comply with the Convention's requirements and hold valid certification for the Inventory of Hazardous Materials (IHM).

4.2. Furthermore, Article 3.4 of the Hong Kong Convention includes the “*No more favourable treatment Clause*,” which should be considered when applying the convention.

#### 5. APPLICATION

5.1. Although Belize is not a ratifying State of the Hong Kong Convention, the following requirements apply to all Belize-flagged vessels of 500 GT and above:

5.1.1 **New Vessels:** Vessels built on or after 26 June 2025 must be delivered with an approved IHM and a valid Statement of Compliance for Inventory of Hazardous Materials (SOC-IHM).

5.1.2 **Calling States:** All Belize-flagged vessels intending to call a State party to the HKC must have a SOC-IHM (Part I) before arriving in these States.

5.1.3 **Existing Vessels:** All existing vessels subject to the Convention must comply and be certified under the HKC provisions by 26 June 2025. After this date, ships preparing for recycling must carry a valid International Ready for Recycling Certificate (RfRC) issued by the Recognized Organization responsible for the SOC-IHM.

5.2. **Compliance Deadline:** By 25 June 2030 (or earlier, if the ship is scheduled for recycling before that date), all existing ships must have an approved Inventory of Hazardous Materials (IHM) (Parts I, II, & III), developed in accordance with MEPC.379(80), and hold a valid SOC-IHM Certificate.



## 6. SURVEY

6.1. All Ships falling under above item 4 shall be surveyed in compliance with *Regulation 10* of the Hong Kong Convention as specified below:

6.1.1. **Initial Survey:** An initial survey must be conducted before the ship is put into service or before the Statement of Compliance on Inventory of Hazardous Materials (IHM) is issued. This survey should verify that Part I of the Inventory, as required by *Regulation 5* of the Hong Kong Convention, is in accordance with the Convention.

6.1.2. **Renewal Survey:** A renewal survey is required every five years. This survey should verify that Parts I, II, and III (as appropriate) of the Inventory required by *Regulation 5* of the Hong Kong Convention are in accordance with the Convention.

6.1.3. **Additional Survey:** An additional survey may be requested by the shipowner following a change, replacement, or significant repair of the ship's structure, equipment, fittings, arrangements, or materials. This survey should ensure that any changes, replacements, or repairs have been made in a manner that ensures continued compliance with the Convention, and that Part I of the Inventory is updated as necessary; and

6.2. **Final Survey:** Prior to the ship being taken out of service and before the recycling process begins, the ship's Recognized Organization (RO) shall:

6.2.1. Conduct a final survey, which includes:

- a. A review of the Inventory of Hazardous Materials (IHM) Parts I, II, and III.
- b. A review of the ship-specific recycling plan.
- c. An evaluation of the ship recycling facility plan.
- d. Verification of the recycling facility's Document of Authorization for Ship Recycling.

6.2.2. Issue of an International Ready for Recycling Certificate, with a validity period of no more than 3 months.

6.3. The initial and renewal surveys must be harmonized with the requirements of other applicable statutory instruments of the Organization, adhering to the parameters outlined in the Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), in its latest revision.

## 7. CERTIFICATION

7.1. The International Merchant Marine Registry of Belize (IMMARBE) delegates the survey and issuance of the Statement of Compliance for Inventory of Hazardous Materials to authorized Recognized Organizations.



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- 7.2. The *Statement of Compliance* issued to any ship in accordance with the Hong Kong Convention must adhere to the format specified in *Appendix 3* of the Convention.
- 7.3. The *Statement of Compliance* shall have a validity period similar to that of other certificates (e.g., SOLAS, MARPOL, etc.), but in no case shall the certificate exceed a period of five years.

## 8. RECOGNIZED ORGANIZATION REQUIREMENTS

- 8.1. All Recognized Organizations acting on behalf of this Administration must submit the following to upgrade their authorization and be able to certify Belize-flagged vessels in accordance with the Hong Kong Convention, if they have not already done so:
  - a. An official application letter addressed to IMMARBE Technical Department.
  - b. Survey procedures that address the requirements of the Hong Kong Convention.
  - c. Statement of Compliance formats.
  - d. Survey reports, and
  - e. Any other relevant information and/or documents.

8.2. Applications should be sent to: [technicalservices@immarbe.com](mailto:technicalservices@immarbe.com).

## 9. European Union Ship Recycling Regulation (EU-SRR)

- 9.1. The European Union (EU) has enacted the European Union Ship Recycling Regulation (EU-SRR), which requires ships flying the flag of a third country to comply with the EU-SRR when calling at EU ports. Therefore, in accordance with *Article 12* of the EU-SRR, Belize-registered vessels of 500 GT and above that call at EU ports must be surveyed and issued a Statement of Compliance for Inventory of Hazardous Materials (SOC-IHM) before entering any EU member state.
- 9.2. The *Statement of Compliance* issued for any ship in accordance with the European Union Ship Recycling Regulation (EU-SRR) must conform to the format specified in Annex 3 of the Guidance on the Inspection of Ships by Port States, as outlined in *Regulation (EU) 1257/2013* on ship recycling. This format is used by EU port states to enforce provisions of the ship recycling regulation.

## 10. FEES

- 10.1. The applicable fees for the issuance of statutory certificates will be in accordance with [MMN-24-005](#) (as revised), which outlines the Administrative Fees for Statutory Certificates issued and endorsed on behalf of IMMARBE.

## 11. ACTIONS REQUESTED

- 11.1. The Administration encourages all Shipowners, Operators, Deputy Registrars, and Recognized Organizations to review and comply with the contents of this Notice and to



ensure that its provisions are enforced on vessels registered with IMMARBE.

## 12. DISCIPLINARY MEASURES

12.1 Failure to adhere to the requirements outlined in this Notice may result in disciplinary action as deemed appropriate by IMMARBE. This may include, but is not limited to:

- a. Suspension or revocation of the vessel's certification.
- b. Imposition of fines or penalties.
- c. Restrictions on the vessel's operations or trading activities.
- d. Other legal actions as specified under the Belize Merchant Ships (Registration) Act, (in its latest revision), and Statutory Instrument 56 of 1999 (as revised).

It is imperative that all parties adhere fully to the procedures and requirements to ensure proper certification and avoid any regulatory issues.

IMMARBE appreciates your cooperation and assistance.

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This notice was issued in Belize City, Belize on 23 September 2024.



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Eng. Eduardo Simon  
Technical Manager  
IMMARBE

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Valarie Lanza (Mrs.)  
Senior Deputy Registrar  
IMMARBE

Any queries related to this Notice shall be directed to [technicalservices@immarbe.com](mailto:technicalservices@immarbe.com)