

SHIPPING INDUSTRY PREPARES FOR ENTRY INTO FORCE OF HONG KONG CONVENTION



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On June 26, 2023, the accession by Bangladesh and Liberia triggered the entry into force of the Hong Kong Convention for the Safe and Environmentally Sound Recycling of Ships (The Hong Kong Convention, or HKC) with entry into force on June 26, 2025.

Its goal is to prevent significant risks to human health and the environment throughout a ship's operating life and during ship recycling. Upon the entry into force of the HKC, new and existing ships with a gross tonnage (GT) of 500 or more should have a valid International Certificate on Inventory of Hazardous Materials (IHM) no later than five years after the convention's entry into force date or before being sent for recycling, whichever occurs first.

The HKC applies to ships of 500GT or more engaged in international trade and flying the flag of a party to the convention or operating under the authority of a flag of a party to the convention, and to ship recycling facilities operating under the jurisdic-

tion of a party to the convention.

Its principal aims are twofold. The first is to enhance ship safety, protection of human health and the environment throughout a ship's operating life.

Ships will be required to develop and maintain an Inventory of Hazardous Materials that consists of three parts:

- **Part I:** Hazardous materials listed in Appendices 1 and 2 to the convention, contained in the ship's structure and equipment including their location and approximate quantities. The convention prohibits or restricts new installation of hazardous materials listed in Appendix 1 and it requires the recording of new installations that contain hazardous materials listed in Appendix 2.
- **Part II:** Operationally generated wastes that are potentially hazardous to the environment and human health at ship recycling facilities.
- **Part III:** Stores like regular consumable goods, which may potentially contain



hazardous materials that are not integral to a ship. Part I should be developed following the 5-step approach outlined in the IHM Guidelines, verified on board and maintained during the operational life of the ship. Parts II and III are to be developed to detail hazardous material that will be delivered with the ship to the recycling facility.

Ships will undergo the following surveys:

- An initial survey to verify Part I of the IHM, before the International Certificate on Inventory of Hazardous Materials is issued.
- A renewal survey at intervals not exceeding 5 years.
- An additional survey (either general or partial) at the shipowner's request after a change, replacement, or significant repair.
- A final survey before recycling.

The second aim is to prevent and to the extent practicable, eliminate accidents, injuries and other adverse effects on human health and the environment caused by ship recycling.

The HKC establishes that the methodology for designing, constructing and operating ship recycling facilities be safe and environmentally sound. These facilities will need to develop a Ship Recycling Facility Plan prior to being authorized by the competent authority(ies) of the party. Prior to recycling a ship, an authorized ship recycling facility must prepare a ship-specific Ship Recycling Plan taking into account information provided by the shipowner.

Actions for ships to comply with HKC

New ships of 500 GT and above contracted on or after June 26, 2025, must have an IHM in place upon delivery. The IHM Part I should be developed in accordance with MEPC.379(80) during the design and construction phase based on the supplier's material declaration forms and should be submitted to the recognized organization or flag administration, along with supporting information Material Declarations (MD) and Supplier's Declaration of Conformity (SDoC). Upon completion of the initial survey, the recognized organization or flag administration will issue the documentation detailing compliance with the IHM Part I.

Some existing ships with IHM Part I may be able to undergo a simple verification by an attending surveyor, while others may need to submit an updated IHM Part I for review. Existing ships with an IHM Part I technically reviewed by ABS for compliance in accordance with resolution MEPC.269(68) or / and EU SRR (EU No.1257/2013) do not require IHM Part I technical submission.

Once reviewed, surveyor attendance will be required to verify that the reviewed IHM Part I is onboard. The surveyor will also confirm the location of materials listed in the IHM Part I. On completion of a satisfactory IHM review and survey, the surveyor will issue the IHM certificates as appropriate.

Existing ships must meet the HKC requirements within five years of the Convention's entry into force on June 26, 2025, or before going for recycling if that occurs earlier. Ships proceeding to a recycling facility may have the initial and final surveys held concurrently.



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