

# IHM – a looming deadline?

Regulation requiring an inventory of hazardous material in ship construction is coming – but is the industry ready?

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New regulations requiring every vessel calling at EU ports to carry an Inventory of Hazardous Material (IHM) come into force in just over six months time, on 31 December 2020. This is potentially a huge issue as owners and crew of existing vessels need to do a lot of work to develop an IHM. During my visits on board and discussions with marine and technical superintendents, I am surprised to find that no one seems to talk about it. While there are many other issues to be dealt with at the moment, this does not mean that regulation has gone away.

## Background to IHM

The Hong Kong International Convention for the safe and environmentally sound recycling of ships (HKC) was adopted in 2009, and overseen by the International Maritime Organization (IMO). It is intended to improve health and safety in shipbreaking practices, which have historically had unacceptably high levels of fatalities, injuries and work-related diseases.

While the HKC itself has not yet been ratified, shipowners should note the entry into force of the EU Ship Recycling Regulation (EU SRR) on 30 December 2013. This regulation closely follows the Hong Kong convention, although there are some important differences.

Importantly, the EU SRR requires every ship of over 500 GT calling at EU ports from 31 December 2020 to carry an Inventory of Hazardous Material (IHM) verified by the relevant administration or authority and specifying their location and approximate quantities.

The IHM is a key part of both the HKC and the EU SRR, providing a harmonised approach to the need to provide detailed information on potentially hazardous materials utilised in the construction of the ship, its equipment and systems. The original IHM must be updated throughout the life of the ship to reflect all upgrades and substitutions. This ensures that the owner has a complete and fully updated document at the time that the ship is delivered to the recycling facility, so that those dismantling the ship are aware of all possible risks and can take appropriate precautions.

## Overview of IHM

The IHM provides ship-specific information on the nature, location and approximate quantities of hazardous materials on board. It should be developed on the basis of the standard format set out in Appendix 2 of IMO Guidelines, Resolution MEPC.269(68).

An IHM consists of three parts:

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

The way in which IHM Part I is developed differs depending on whether the ship is a newbuild or an existing vessel. Once created, it must be maintained throughout the lifetime of the vessel. IHM Part II and Part III apply only when the ship is actually being sent for recycling.

## Development process for newbuildings

For newbuilds, Part I of the inventory should be developed at the design and construction stage. Reference should be made to the relevant IMO guidelines. The process should include three steps:

1. Collection of information on hazardous materials used;
2. Utilisation of this information;
3. Preparation of the IHM.

## Developing an IHM Part I for existing ships

Part I of the Inventory for existing ships should be developed by the shipowner, again referring to the relevant IMO guidelines. The process should include five steps:

1. Collection of necessary information;
2. Assessment of collected information;
3. Preparation of visual/sampling check plan;
4. On board visual/sampling check;
5. Preparation of Part I of the inventory and related documentation.

## Development process for IHM Parts II and III

Once the decision to recycle a ship has been taken, Parts II and III of the inventory should be developed before the final survey, taking into account that a ship destined to be recycled shall conduct operations in the period prior to entering the ship recycling facility in such a way as to minimise the amount of cargo residues, remaining fuel oil and ship generated waste remaining on board. The IMO guidelines provide a catalogue of potentially hazardous material in table C of Appendix 1, stating whether the materials should be listed in Part II or in Part III of the inventory.

## Survey and certification

All ships shall be subject to a survey regime and shall carry on board a ship-specific 'Inventory Certificate' issued by the administration or a Recognized Organization (RO).

These ships shall be subject to the following surveys:

- a. Initial survey to verify Part I compliance;
- b. Renewal survey to verify Part I compliance;
- c. Additional survey for any change, replacement or significant repair;
- d. Final survey to verify that IHM Parts I, II, and III and the recycling plan are in compliance.

The classification society may add an IHM notation to the vessel's Class Certificate.

## Implementation deadlines

The deadlines for the preparation and verification of IHM are as follows:

- EU-flagged newbuildings were required to have a verified IHM with a Statement of Compliance by 31 December 2018.
- Existing EU-flagged ships are required to have onboard a verified IHM with a Statement of Compliance by 31 December 2020.
- Non-EU-flagged ships calling at EU ports are also required to have onboard a verified IHM with a Statement of Compliance by 31 December 2020. 🌐