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The EU SRR: Application, Implementation & Survey and Certification requirements

DromonClass wishes to bring the EU SRR's requirements and remind on how the Owners can ensure compliance of their fleet.

Notice to: [Ship Owners/ Managers/ Operators](#) | [Surveyors/Auditors](#)

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The [Hong Kong International Convention](#) (hereinafter referred to as "HKC") for the Safe and Environmentally Sound Recycling of Ships is not yet in force. It will enter into force 24 months after ratification of 15 Member States, representing 40% of world merchant shipping by GT, combined maximum annual ship recycling volume not less than 3% of their combined tonnage. Currently 13 Flag Administrations have ratified the Convention, representing the 29,42%.

The European Union (EU) having in mind the HKC requirements and in order to boost its ratification from the Member States, has adopted the [Regulation \(EU\) 1257/2013](#) of the European Parliament and of the Council of 20 November 2013 on ship recycling amending Regulation (EC) 1013/2006 and Directive 2009/16/EC (hereinafter referred to as "EU SRR"). The EU SRR is closely following the HKC's structure, concepts and definitions. However, the Regulation also sets out a number of additional requirements that go beyond those set in the HKC.

Applicability

The Regulation applies to ships on international voyages, of 500 GT and above flying the flag of a Member State or the flag of a third country under the conditions of Article 12 of the Regulation. The Regulation applies to all vessels of any type whatsoever operating or having operated in the marine environment including submersibles, floating craft, floating platforms, self-elevating platforms, FSUs and FPSOs, as well as ships stripped of equipment or being towed.

It does not apply to any warships, naval auxiliary or other ships owned or operated by a state and used, for the time being, only on government non-commercial service. 'New' and 'existing' ships, 'ships going for recycling' as well as 'ships flying the flag of a third country' shall have on board an IHM in accordance with the relevant provisions of Article 5 or Article 12 of the Regulation.

The application date of the EU's Ship Recycling Regulation (EU SRR) was 31 December 2018. From this date, new EU ships must carry a certificate for the Inventory of Hazardous Materials (IC) while existing EU ships shall only carry an IC from 31 December 2020. Non-EU ships should only be requested to submit a Statement of Compliance (SoC), together with the inventory of hazardous materials, from 31 December 2020.

Implementation

An Inventory of Hazardous Materials (hereinafter referred to as "IHM") must be taking into account the IMO Resolution [MEPC.269\(68\)](#).

In accordance with Article 5 of the Regulation, all ships flying the flag of an EU Member State shall have on board an IHM. Furthermore, in accordance with Article 12 of the Regulation, all ships flying the flag of a third country shall also have on board an IHM when calling at a port or anchorage of an EU Member State.

The IHM consists of:

- Part I: HM contained in ship structure or equipment and referred to in Annexes I and Annexes II of the SRR;
- Part II: Operationally generated wastes; and
- Part III: Stores.

In general, a 'new' ship shall have on board an IHM which shall identify at least the HM referred to in Annex II of the Regulation while an 'existing' ship or a 'ship going for recycling' before the final application date of the SRR, shall have on board an IHM which shall identify, at least, the HM listed in Annex I of the Regulation. Annex I of the Regulation lists five types of hazardous materials and Annex II lists the items of Annex I as well as an additional ten types of hazardous materials.

In all cases the IHM shall be properly maintained and updated throughout the operational life of the ship, reflecting new installations containing any HM referred to in Annex II of the Regulation and relevant changes in the structure and equipment of the ship.

Survey and Certification

All ships flying the flag of a Member State shall be subject to a survey regime, as per Article 8 of the EU SRR and they shall carry on board a ship-specific 'Inventory Certificate' issued by the administration or a RO authorised by it and supplemented by Part I of the IHM.

When calling at a port or anchorage of a Member State, all ships flying the flag of a third country shall carry on board a ship-specific 'Statement of Compliance' issued by the relevant authorities of the third country whose flag the ship is flying or an organization authorised by them and supplemented by Part I of the IHM.

EMSA Guidance on the Inventory of Hazardous Materials & on Ship Recycling Port State Control inspections

The European Maritime Safety Agency (EMSA) has released a [Best Practice Guidance](#) on a harmonised approach to the development and maintenance of IHMs in accordance with Article 5 and Article 12 of the EU SRR.

EMSA released also the [Guidance on inspections of ships by the port States](#) in accordance with Regulation (EU) 1257/2013 on ship recycling, 'Inspections from the EU port States to enforce provisions of the ship recycling Regulation.

The PSC Guide advises inspectors that the detention of a ship may be considered if the ship recycling non-compliances involve:

1. failure to carry a ship recycling-related certificate as appropriate;
2. failure to carry a valid ship recycling-related certificate, i.e. when the condition of the ship does not correspond substantially with the particulars of the certificate (except when Part I of the Inventory of Hazardous Materials has not been properly maintained and updated);
3. the Inventory of Hazardous Materials required by the EU SRR is not specific to the ship;
4. the Inventory of Hazardous Materials required by the EU SRR has not been verified by the Flag State or an appropriate organisation authorised by it;
5. the ship recycling plan does not properly reflect the information contained in the Inventory of Hazardous Materials;
6. an EU ship is heading to a ship recycling facility not included in the European list of ship recycling facilities;
7. non-compliance with the control measures for Hazardous Materials listed in Annex I of the EU SRR.

Dromon Training on Ship Recycling

DromonClass has carried out a training on the Ship Recycling on October 23rd to 25th, 2019 in Limassol, Cyprus. The training was addressed to DBS Exclusive Surveyors as well as Dromon Head Office personnel.

The Trainees had a chance to understand the requirements of the EU SRR Regulation and the Hong Kong Convention as well as:

- be familiar with the Inventory of Hazardous Materials template and documents for compliance;
- be familiar with specific aspects of methods for sampling, ship equipment, risk assessment prior the ship recycling survey, preparation of VSCP and RCP, ship specific IHMs;
- how to take samples and documentation of inspections on board of ships;
- be familiar with the safe working conditions and protective equipment; and
- how to conduct an initial, renewal, additional and final ship recycling survey, issue/endorse the applicable certificate and complete the report.



Act now

Ship owners / Managers / Operators are urged to develop their Inventories of Hazardous Materials, having in mind the relevant IMO Guidelines in order to comply with the EU SRR.

Ship owners / Managers / Operators of vessels flying a non-EU flag, should be urged to ensure compliance with the EU SRR by having on board their vessels a Statement of Compliance and an IHM when calling EU Ports, after 31 December 2020.