

# STATUTORY INTERPRETATIONS

DNVGL-SI-0289

Edition July 2019

## Inventory of hazardous materials (IHM)

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## FOREWORD

DNV GL statutory interpretations contain the Society's own interpretations of statutory regulations. These are valid when not instructed otherwise by the flag or coastal state administration, and when no interpretations exist from IACS or regulatory bodies. The publication covers only selected relevant topics and shall under no circumstances be taken as the Society's complete interpretations of such regulations.

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## CHANGES – CURRENT

This is a new document.

This document enters into force 1 January 2020.

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## SECTION 1 INTRODUCTION

### 1 General

#### 1.1 Introduction

This publication presents the Society's interpretations of the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 (SR/CONF/45), hereafter referred as HKC, and Regulation (EU) No 1257/2013 of the European Parliament and of the Council of 20 November 2013 on Ship Recycling, hereafter referred to as EU SRR, and the guidelines of the regulations, when required. Such interpretations may be on matters which are left to the satisfaction of the flag administration or are vaguely worded. The interpretations of requirements described in this publication, are given in those circumstances where no flag requirement, no IACS unified interpretations (UIs) or no other interpretations exist.

#### 1.2 Scope

This publication covers only selected topics of HKC and EU SRR, and shall not be taken as the Society's complete interpretations of HKC and EU SRR.

#### 1.3 Statutory certification

**1.3.1** The Society undertakes statutory certification on behalf of flag administrations when, and to the extent, the Society has been authorised to do so by the individual flag administration. Statutory certification includes inter alia approval, survey and the issuance of statutory certificates. See [DNVGL-RU-SHIP Pt.1 Ch.1 Sec.1 \[2.4\]](#).

#### 1.4 References

**Table 1 Reference documents**

<i>Document code</i>	<i>Title</i>
DNVGL-CG-0550	Maritime services
Regulation (EU) No 1257/2013 Regulation (EC) No 1013/2006 Directive 2009/16/EC	EU Ship Recycling Regulation (EU SRR)
2009 SR/CONF/45	The Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships (HKC)
Resolution MEPC.269(68)	Guidelines for the development of the Inventory of Hazardous Materials (IHM guidelines)
Resolution MEPC.196(62)	Guidelines for the development of the Ship Recycling Plan (SRP guidelines)

## 1.5 Definitions and abbreviations

**Table 2 Definitions**

<i>Term</i>	<i>Definition</i>
third country	country which is not a member state of the European Union
HazMat inspection	investigation to trace and identify the presence or absence of hazardous materials contained on board a vessel and may include review of any relevant documents, visual inspections and sampling

## 1.6 Abbreviations

**Table 3 Abbreviations**

<i>Abbreviation</i>	<i>Description</i>
DASR	document of authorization to conduct ship recycling
MD	material declaration
HBCDD	hexabromocyclododecane
PFSO	perfluorooctanesulfonic acid
SDOC	supplier's declaration of conformity
UPS	uninterruptible power supply
VSCP	visual sampling check plan

## 2 Applicable statutory requirements

### 2.1 Application

When the Society acts on behalf of a flag administration, the Society follows international statutory instruments, IACS unified interpretations, DNV GL statutory interpretations, and generally follows guidance issued by IMO in circulars, etc., unless the flag administration has instructed the Society otherwise.

### 2.2 Amendments and adoption

New and amended statutory interpretations (SI) shall be applied from six (6) months after date of publishing, unless otherwise noted.

## SECTION 2 EU SRR AND HKC INTERPRETATIONS

### 1 Documentation requirements

For vessels, the documentation shall be submitted as required in [Table 1](#) for verification and issuance of the inventory of hazardous materials compliance document and for the issuance of a ready for recycling compliance document.

**Table 1 Documentation requirements**

<i>Documentation type</i>	<i>Additional description</i>	<i>Newbuilding</i>	<i>Vessel in operation</i>	<i>Vessel due for recycling</i>
M080 - Inventory of hazardous materials (IHM), Part I	IHM shall be signed by the originator. The IHM shall contain an identification/verification number of reference or report number on the front page.	AP	AP	
M081 - Inventory of hazardous materials (IHM), Part I, II and III	IHM shall be signed by the originator. The IHM shall contain an identification/verification number of reference or report number on the front page.			AP
M100 - Material declaration (MD) collection	A list containing all MD data including vessel location is also acceptable.	FI	FI	FI
M110 - Supplier's declaration of conformity relating to use of hazardous materials (SDOC) collection	SDOC from suppliers.	FI	FI	FI
M120 - Hazardous materials location plan	Sections of vessels general arrangement plan with markings of the found hazardous materials.		FI	FI
Z090 - Equipment list	Component and equipment description which is used in the vessel's construction including the suppliers information.	FI		
Z250 - Procedure	IHM maintenance manual. Instructions for record keeping after change, replacement, or repair of structure and components, including a template for updating IHM.	FI	FI	
Z268 - Assessment report	HazMat inspection report including: scope and methodology, accredited laboratory results, estimation of the quantity of hazardous materials, hazmat expert qualifications, results and conclusions.		FI	FI
M085 - Hazardous materials documentation	Visual sampling check plan (VSCP).		FI	FI

<i>Documentation type</i>	<i>Additional description</i>	<i>Newbuilding</i>	<i>Vessel in operation</i>	<i>Vessel due for recycling</i>
Z100 - Specification	Documents such as stated in IHM guidelines appendix 5, chapter 2.1.		FI	FI
M140 - Ship recycling plan*	Developed in accordance with SRP guidelines and approved by the competent authority of the ship recycling facility.			FI
Z300 - Declaration *	Document of authorization to conduct ship recycling (DASR) issued by the competent authority of the ship recycling facility.			FI
<p>* Not applicable for class notation <b>Recyclable</b> see <a href="#">DNVGL-RU-SHIP Pt.6 Ch.7 Sec.4.</a></p> <p><b>Note:</b> For general requirements of documentation, including definition of info codes, see <a href="#">DNVGL-CG-0550 Sec.5</a> and <a href="#">DNVGL-CG-0550 Sec.6.</a></p> <p style="text-align: center;">---e-n-d---o-f---n-o-t-e---</p>				

## 2 EU SRR Article 5(5a) / HKC Regulation 5.3: Hazardous materials in structure and equipment

The objects listed in [Table 2](#) shall as a minimum be considered. The list is based on the IHM guidelines.

**Table 2 Components required to be inspected for all vessels for IHM Part I**

<i>Object</i>	<i>Additional description</i>
paint and coating systems	paint applied to structure and hull, including primer, anti-fouling, fluorescent paint
insulation	insulation of equipment, minimum including refrigerant and exhaust piping, boilers, air conditioning ducts and liquefied gas tanks
	insulation of structure, in ceilings, walls, floors, doors and bulkheads
	insulation of hatches, watertight doors and fire doors
refrigeration systems	including provision plant and insulation foams
firefighting and fire detection systems	including the fire fighting foams, detectors and sensors
batteries	including uninterruptible power supply (UPS)
deck machinery	minimum including cranes, winches and davits
process equipment	such as heat exchangers, bilge water separators, sludge purifiers, ballast water treatment units, sewage treatment units, selective catalytic reduction systems, and incinerators
gaskets and brake linings	gaskets of different piping systems including: rubber, teflon, wire graphite and various packings and gaskets. Brake linings of winches/windlass, and davits
electrical cables and cable penetration material	including sealings, mastic, putty
electric equipment	such as generators, transformers, condensers, capacitors, switchgear, control gear, electric motors, distribution boards, breakers, frequency drives, junction boxes, rectifiers, chargers, cabinets, and enclosures



<i>Object</i>	<i>Additional description</i>
light fittings and fixtures	navigation and signal lights, and other lighting fixtures
instrumentation	such as gauging equipment, thermometers electronic components, actuators, sensors, gauges, cabinets and enclosures
engines and boilers	for propulsion and auxiliary use
thrusters	bow thruster, stern thruster and other thrusters
pipng systems	including piping, GRP pipes, PVC pipes, flanges, valves, pumps, and compressors
other components containing hazardous materials	such as supply units, booster units, navigation systems, automation and remote control systems, alarm system, power management system, and hydraulic fluids

### 3 EU SRR Article 5.2 / HKC Regulation 5.2: As far as practicable

The study of documents for inspection of Annex II of EU SRR-listed hazardous materials is considered 'as far as practicable'. For testing of Annex II of EU SRR listed substances it is considered 'as far as practicable' using samples already taken for testing of Annex I of EU SRR listed substances.

### 4 EU SRR Article 12(1): IHM for ships flying the flag of a third country

According to Article 12(1) vessels flying the flag of a third country requires an IHM covering Annex II as far as practicable. Consequently hexabromocyclododecane (HBCDD) shall be inspected. However, it is considered as not practicable under reasonable effort to start a separate inspection for HBCDD. Therefore IHMs without HBCDD coverage are qualified as in compliance with this article.

### 5 EU SRR Article 12(4): Maintenance of IHM for ships flying the flag of a third country

For the maintenance of those IHMs of vessels flying the flag of a third country, the inspection of Annex II listed substances including HBCDD shall be conducted by collecting material declarations (MD).

**Guidance note:**

The material declaration form covers all 15 hazardous materials of Annex II of EU SRR. Therefore for IHM maintenance, it is recommended to consider the coverage of perfluorooctanesulfonic (PFOS) also for vessels flying the flag of a third country.

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## CHANGES – HISTORIC

There are currently no historical changes for this document.

### **About DNV GL**

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