



TECHNICAL CIRCULAR No. 792 of 4th September 2023

To	All Surveyors/Auditors. All flags
Title	Hong Kong Convention-recycle of ships
Reference	IMO 2009 Hong Kong Convention

The IMO 2009 Hong Kong Convention for the safe and environmentally sound recycling of ships

The 2009 IMO Hong Kong Convention for the Safe and Environmentally Sound Recycling of Ships (HKC) will enter into force *on 26 June 2025*.

Its criteria for ratification have now been met following Bangladesh and Liberia becoming Contracting States to the convention in June 2023.

The main aim of the HKC's new requirements for shipping and ship recycling facilities is to ensure that the end-of-life recycling of ships is done in a safe and environmentally sound manner to minimize risks to human life and the environment.

Key features of the HKC

The HKC sets requirements to control and document the use of certain hazardous materials, including asbestos, ozone depleting substances, PCBs, antifouling compounds, and systems, which are found in the ship's structure and fitted equipment.

For in-service ships, this control is through the development of, and throughout operational life maintenance, of a ship-specific Inventory of Hazardous Materials (IHM – Part I), which must be verified and certified by an authorized Recognized Organization (RO).

Ships at their end-of-life must have a final survey, their IHM updated to include operationally generated wastes (Part II) and items in the ship's stores (Part III) that will be present at the point of recycling and select an authorized recycling facility.

Ship recycling facilities are required to be authorized by their competent authority, have a ship recycling facility plan (SRFP) and produce ship-specific recycling plans (SRP) for each vessel they recycle, taking into account information in the completed IHM.

HKC applicable ships

The HKC will apply to ships of 500 GT and over flying the Flag of a party to the HKC. A ship means *"a vessel of any type whatsoever operating or having operated in the marine environment and includes submersibles, floating craft, floating platforms, self-elevating platforms, Floating*

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Storage Units (FSUs), and Floating Production Storage and Offloading Units (FPSOs), including a vessel stripped of equipment or being towed.”

Requirements for shipowners

Inventory of Hazardous Materials

New ships – From 26 June 2025, all new ships¹ will be required to be delivered with an approved Inventory of Hazardous Materials (IHM) (Part I only) and corresponding valid Certificate². During the build, the IHM Part I should be compiled based on Material Declarations collected from the supply chain by the shipbuilder, following the guidance set out in the recently updated (Expected) MEPC.379(80) - 2023 Guidelines for the Development of the Inventory of Hazardous Materials, which supersedes MEPC.269(68).

Existing ships

No later than 25 June 2030 (or before going for recycling if this is earlier), all existing ships will be required to have an approved IHM (Part I only), developed following the above-mentioned guidelines, and hold a corresponding valid Certificate² on board.

When developing the IHM Part I, in the absence of a complete Material Declaration paper trail from build to ascertain the presence or absence of hazardous materials on board, a shipowner may need to undertake sampling and analysis for hazardous materials before the IHM can be completed. It's recommended that this is completed at the same time as the renewal of the Cargo Ship Safety Construction Certificate, Cargo Ship Safety Certificate, or the Passenger Ship Safety Certificate.

Final Survey

From 26 June 2025, ships going for recycling will need to have a valid Ready for Recycling Certificate (RfRC) issued. Where authorized by the Flag this will be issued by CONARINA and will be valid for no longer than three months. A RfRC is issued based on a review of the completed IHM (Parts I, II & III), verification that an authorized ship recycling facility has been chosen, and that a ship-specific recycling plan has been produced based on the information provided in the completed IHM.

From 26 June 2025, ship recycling facilities operating in countries which are party to the convention, or which are used by ships flying the Flag of parties to the convention, will need to comply with the following requirements of the HKC:

Ship Recycling Facility Plan

Recycling facilities will be required to have a SRFP adopted by the board or appropriate governing body of the Recycling Company. The SRFP should be developed and maintained, considering MEPC.210(63) 2012 Guidelines for Safe and Environmentally Sound Ship Recycling, identifying the recycling facilities established management systems, operations, procedures, and techniques to minimize health risks to workers and reduce adverse effects to the environment.

Ship Specific Recycling Plan

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Ship recycling facilities are responsible for developing a ship-specific recycling plan (SRP) for every vessel they will recycle. The SRP should be developed before the recycling of a ship can take place, following the guidance in MEPC.196(62) Guidelines for the Development of the Ship Recycling Plan. The SRP should draw upon the operational processes set out in the SRFP and consider the information provided by the shipowner in the completed IHM (Parts I, II and III). Each SRP should then be approved either tacitly or explicitly by the recycling facilities' competent authority.

Authorization

Ship recycling facilities will be required to be authorized by their competent authority following the guidance set out in MEPC.211(63) Guidelines for the Authorization of Ship Recycling Facilities and hold a valid Document of Authorization to conduct ship recycling (DASR).

To obtain a DASR, the SRFP will be reviewed and, if found satisfactory after a site inspection, the competent authority or RO working on behalf of that authority will issue the DASR. The DASR will remain valid for no longer than five years. At least one additional audit must be carried out by the competent authority halfway through the validity period of the DASR. Additionally, any modifications to the ship recycling facility may prompt a new inspection by the competent authority for hazardous materials.

Recycling Facilities

Owners of recycling facilities in countries who are party to the HKC should start developing their SRFP and liaising with the competent authorities about authorization of the facility.

¹ "New ship" means a ship:

- For which the building contract is placed on or after 26 June 2025; or
- In the absence of a building contract, the keel of which is laid or which is at a similar stage of construction on or after 26 December 2025; or
- The delivery of which is on or after 26 June 2030.

² For ships registered with Flags which have ratified the HKC: International Certificate on Inventory of Hazardous Materials (IC).

REFERENCES:

- IMO 2009 Hong Kong Convention

ATTACHMENTS: No

Kindest Regards,
CONARINA Technical Office

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