

Technical Notice

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SUBJECT:

The EU Ship Recycling Regulation (EU SRR) is coming into general application on 31 December 2018

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The **EU Ship Recycling Regulation (EU SRR)** is coming into general application on **31 December 2018**. The EU regulation is similar to the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009, (Hong Kong Convention) which has not yet entered into force internationally. The EU Regulation essentially applies the ship recycling requirements of the Hong Kong Convention to ships flagged with EU Member States, as well as certain requirements to non-EU flagged ships calling at EU ports.

Key elements of the EU Regulation No. 1257/2013 on Ship Recycling

The European Regulation No. 1257/2013 on Ship Recycling (the SRR) regulates the safe and environmentally sound recycling of EU flagged ships but also expanding to cover non-EU flagged ships of their last voyage from EU waters:

The European Regulation No. 1257/2013 on Ship Recycling (the SRR), having already entered into force in Dec 2016, regulates the safe and environmentally sound recycling of EU flagged ships but also expanding to cover non-EU flagged ships of their last voyage from EU waters:

- The EU SRR will require, from 31/12/2020, non-EU flagged ships that visit EU ports to have an Inventory of Hazardous Materials (IHM). Any non-EU flagged ships having a last voyage that either starts from an EU port, or transits through an EU port, will continue to be regulated by Europe through the Waste Shipment Regulation (and not the EU SRR).
- From 31 December 2018-the "date of application" of the regulation, EU-flagged vessels will have to be scrapped at facilities on an EU approved list (see <http://ec.europa.eu/environment/waste/ships/list.htm>).
- For vessels in operation and flying the flag of an EU member state, the certified IHM is required starting 31 December 2020.
- In general, the EU SRR specifies that the ships flying EU flag at the end of their lifespan can only be sent for recycling at EU approved recycling yards, and non-EU

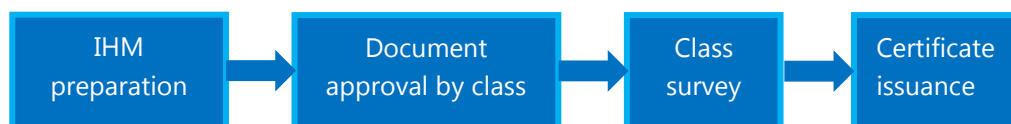
flagged end-of-life ships departing or transiting EU ports will continue to be subject to the Waste Shipment Regulation of the EU, which prohibits their recycling outside OECD countries. Therefore, non EU flagged ships will not have the choice of going to any non OECD recycling facilities that may be listed in the EU list of approved yards (unless they change flag to an EU flag).

Inventory of Hazardous Materials (IHM)

An IHM maintenance procedure should be implemented, including the assignment of a qualified designated person whose duties should be incorporated in the ship owner's quality management system.

The IHM certification process

The IHM certification process can be summarized as follows:



The shipowner may contract a competent third-party company (a so-called HazMat Expert) to prepare the IHM, which involves document collection, on-board sampling check, and laboratory analysis.