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SGS IHM

Uncovering the Myths of IHM and IHM-Maintenance

Part 1: Introduction to IHM and IHM-Maintenance

From **December 31st 2020** the EU-Ship Recycling Regulation (EU-SRR, Reg. 1257/2013) requires from any EU-visiting ship above 500GT to have a **certified and maintained IHM Part I** (Inventory of Hazardous Materials in structure and equipment) onboard.

The IHM-Guidelines of IMO (Res. MEPC 269(68)) apply to non-EU-flagged ships (“IMO-IHM”) whereas for EU-flagged ships an “EU-IHM”, covering two more substances, is required. Port States of EU are obliged to control and enforce this. In France **penalties** are up to 100k EUR or 1-year imprisonment whereas in Brexit-UK it is an undefined “financial penalty” and 2 years imprisonment.

IHMs are similarly required for new and existing ships but development is following different approaches. For **new ships** which (will) fly an EU-flag and having a building contract signed after 30.12.2018, the IHM is under the responsibility of the building yard and to be based on SDoC (company specific “Suppliers Declaration of Conformity”) and MD (product specific “Material Declaration”) from all relevant purchases. The same approach applies to maintenance of IHM as well.

Documents can also be utilized for developing IHMs for **existing ships**, but they are usually not available. Therefore, majority of IHMs are developed more efficiently on hand of inspection & sampling onboard. This is a job for owners or external “IHM-Experts”. Class approvals exists for individuals and companies, but none is mandatory. Samples are to be analysed by accredited laboratories which have to apply the methods specified in the regulations. Results from onboard inspections and laboratories are to be compiled in an **IHM-Report**, reflecting all checks done, and the **IHM** itself, containing only identified hazardous materials. Both is to be sent to the chosen classification society (IHM-certification is independent of ships’ class) and/or flag state (depending on flag).

Prior to inspecting a ship, some preparations are required, depending on IHM Expert, ship location and class. It can take from an hour to a few weeks (i.e. if class requires approval of “visual sampling and check plan”). A ship inspection usually takes one to two days followed by analyses in the laboratory. Once lab-results are received the IHM and IHM-Report are finalized and sent to class / flag for review and initial survey prior to issuing the **certificate** or Statement of Compliance. Laboratories and classes require more time nowadays due to increased demand. Getting a certified IHM within less than 3 months after placing the order requires “fortunate circumstances” and is not the norm anymore. The **deadline** is only **2.5 months** away!

Throughout most of 2020, COVID-19 restrictions have hampered ship inspections and EU-leaders are urged by industry to either **postpone the deadline**, or relax its enforcement. The outcome of debates in Brussels remains to be seen, no decision has been published yet. Latest polls indicate that only 20% to 25% of the total of ~35.000 affected ships have a certified IHM onboard. 55% probably have not even signed a contract and that’s certainly independent of COVID-19. In case enforcement will be eased by EU, it’s likely that during PSC inspections ships need to provide **evidence** that they’ve tried to become compliant in time. For the less likely case that the deadline will be postponed, will the lack of performance continue? Or will this be a wake-up call and cause a second wave of IHM-orders? If so, can the work load be absorbed by capable capacities?

Not only penalties for incompliance, which also includes lack of appropriate **IHM-maintenance**, from port states are severe, the cost for incompliance with charterers’ orders in case of being banned from certain ports or detained are far more substantial. Additionally, the IHM is a **technical file** which belongs to the ship and if quality is low, renegotiations after sales may cost another fortune.

The IHM itself is not a “must have paper”, it creates substantial liabilities!

Please watch out for follow-up articles providing detailed insights and support for IHM-compliance.