

A series of informative articles
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NautilusLog
SGS IHM

Uncovering the Myths of IHM and IHM-Maintenance

Part 4: Risks and True Costs of IHMs

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Health and safety is subject to increasing numbers of laws and regulations, also in shipping. Recycling regulations shall ensure that ships will be dismantled with low risks for people and the environment at the end of their operational life and like in other industries, they apply from: **Cradle to Grave!**

For achieving the desired HSE-standards during ship recycling, it is essential to know what hazardous materials are onboard a ship. That's the key aspect for Inventory of Hazardous Materials Part I (hazardous materials in structure and equipment of a ship - IHM). Development and maintenance is subject to class / flag certification and control by EU-PSC from end of this year onwards. Detailed know-how on ships' equipment and materials and which hazardous substances might be contained therein is required. That's the reason why regulators suggest to involve "IHM-Experts" for developing IHMs for existing ships. Same should be applied for IHM-Maintenance, but plenty of approaches and prices can be found, so what is a suitable business partner or what risks and costs are to be considered by shipowners?

Costs and responsibilities

It is the ship owner's responsibility to ensure continuous conformity of the inventory of which a certified IHM is the beginning, and maintenance and ongoing effort throughout the operational life of a ship. Maintenance of IHMs requires collection of statements (Material Declaration - MD and Suppliers Declaration of Conformity - SDoC) from relevant suppliers who have to overtake full responsibility as long as the product exists onboard. Many of them struggle to provide accurate documents and it's by far the most time-consuming task of IHM-maintenance to get compliant documents from suppliers (around 75% of the time!). Only for relevant orders MD and SDoC should be requested, as otherwise the workload is increased unnecessarily. Only ~20% of all orders are relevant, but identification requires exact knowledge on the scope of IHMs. A "service approach" which requires from owners to collect documents from suppliers or where onboard-changes are asked for once a month, are clear indicators that most of the work and liabilities remain with the owners. The true costs of IHM-maintenance are increased and quality as well as compliance-level of IHM decreases. Important to note in addition is that neither shipowners nor IHM-Experts can judge if or how much of a hazardous substance might be contained in a product, only the supplier and his supply-chain have this information. A document-based chain of information and liability is to be established for IHM-maintenance and own guesswork avoided. Various bits & pieces need to be evaluated and this requires sound knowledge on compliance data. Only accurately filled-in documents from suppliers and evidence-based maintenance safeguards shipowners. If this task is put into the wrong hands, shipowners face manifold risks due to incompliant IHMs (HSE-damages during operations and recycling, denied re-certification by class or flag, PSC-penalties, detentions, imprisonment, claims from cargo owners, charterers or future ship owners, etc.). What counts is how smart, thought-through and transparent the service is, not how big a service provider is.

More than IHM Maintenance Service

In any case, GSR, NautilusLog and SGS are well aware of all material compliance aspects and have the capabilities to also solve suppliers' challenges with our tools. Whether or not you had your IHM survey carried out by another supplier, we can support you fully, from risk assessment of identified hazardous materials, cleaning your IHM from unjustified entries, to management plans and removal, if necessary. We take care of IHM-data compliance throughout the entire life of a ship. We unburden owners completely as we start with a copy of your basic purchasing data and take care of all other aspects including uninterrupted provision of updated IHMs and Maintenance Reports. Shipowners won't be involved in this process except that in case of removal or installation of a hazardous material containing item information from the ship is required. That applies to less than 1% of all ordered items and requires only a few clicks in a ship-specific website. With this all is done!

The system of NautilusLog makes it easier to maintain your IHM report: from construction, throughout service life, until dismantling. Why this is so convenient? We simplify work, prevent unnecessary efforts, provide guidance to all involved and ensure that costs are kept to the minimum.

Not every supplier is able to keep maintenance costs low!

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