



IMO 2009 Hong Kong Ship Recycling Convention - INTERCARGO

Advice for ship owner and recycling facilities

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Regulations governing recycling of ships



2009 Hong Kong Ship Recycling Convention

IMO **global convention** aimed at setting standards for recycling of ships.

Entry into force 26 June 2025, with phased application for ships in service and immediate application for end-of-life ships and ship recycling facilities.

Enforcement through flag state and port state control **inspections**.



EU Ship Recycling Regulation

Regional regulation setting requirements for in service ships calling at EU ports (regardless of flag) and EU flagged end of life ships.

Entry into force 2013, with **phased application from 2018**.

Enforcement through flag and PSC **inspections**.



Basel Convention

Global but **not maritime specific**. Controls on the transboundary movements of hazardous wastes.

Ships going for recycling are **defined as waste** and must comply with BC requirements even if still operational.

Enforcement between exporting and importing state being in place. **Not flag related**.

Complex regulatory framework which needs sorting out ...

Hong Kong Ship Recycling Convention



Inventory of Hazardous Materials

All **in-service ships to comply** with:

- Flying the flag of a state party to the Convention, or
- Calling at a port in a country that is a party to the Convention.

When?

- **New builds:** From **26 June 2025**.
- **Existing ships:** By 26 June 2030, however, we strongly recommend the **next harmonised survey** after 26 June 2025.

What is required?

- A **valid Inventory of Hazardous Materials (IHM)**.
- An **International IHM Certificate**, valid for **5 years**, issued by the **RO** or **flag State**.



Final Survey

All **in service ships going for recycling** to comply if:

- flying the flag of a state party to the Convention, or
- being recycled in a country party to the convention.

When?

- Any **ship going for recycling** on or after **26 June 2025**

What is required?

- **IHM part I** and valid **certification**
- IHM **parts II & III**
- a **ship specific recycling plan** from an authorised recycling facility
- An **international ready for recycling certificate**. Valid for **3 months**. Issued by **RO** or **flag State**.



Ship Recycling Facility Certification

All **recycling facilities** operating in countries party to the convention.

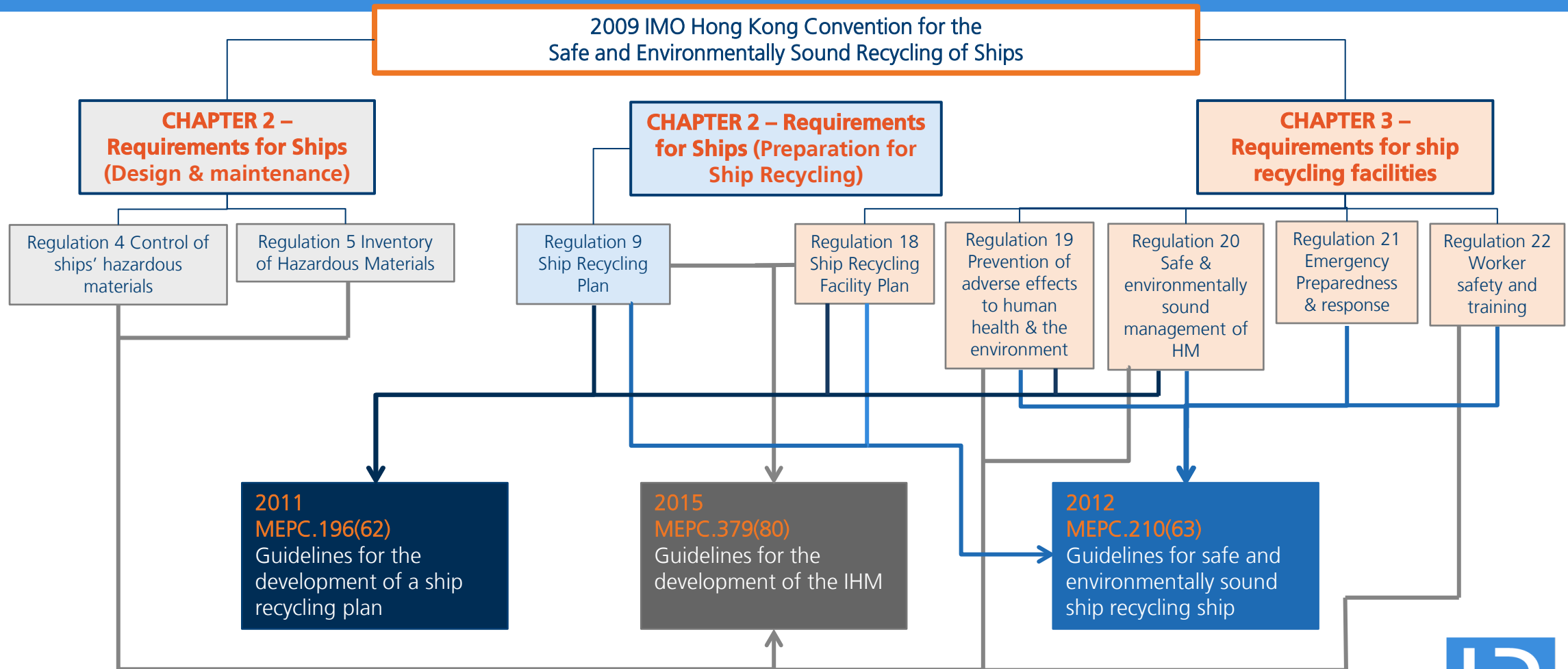
When?

SRF certification need certification from **26 June 2025**.

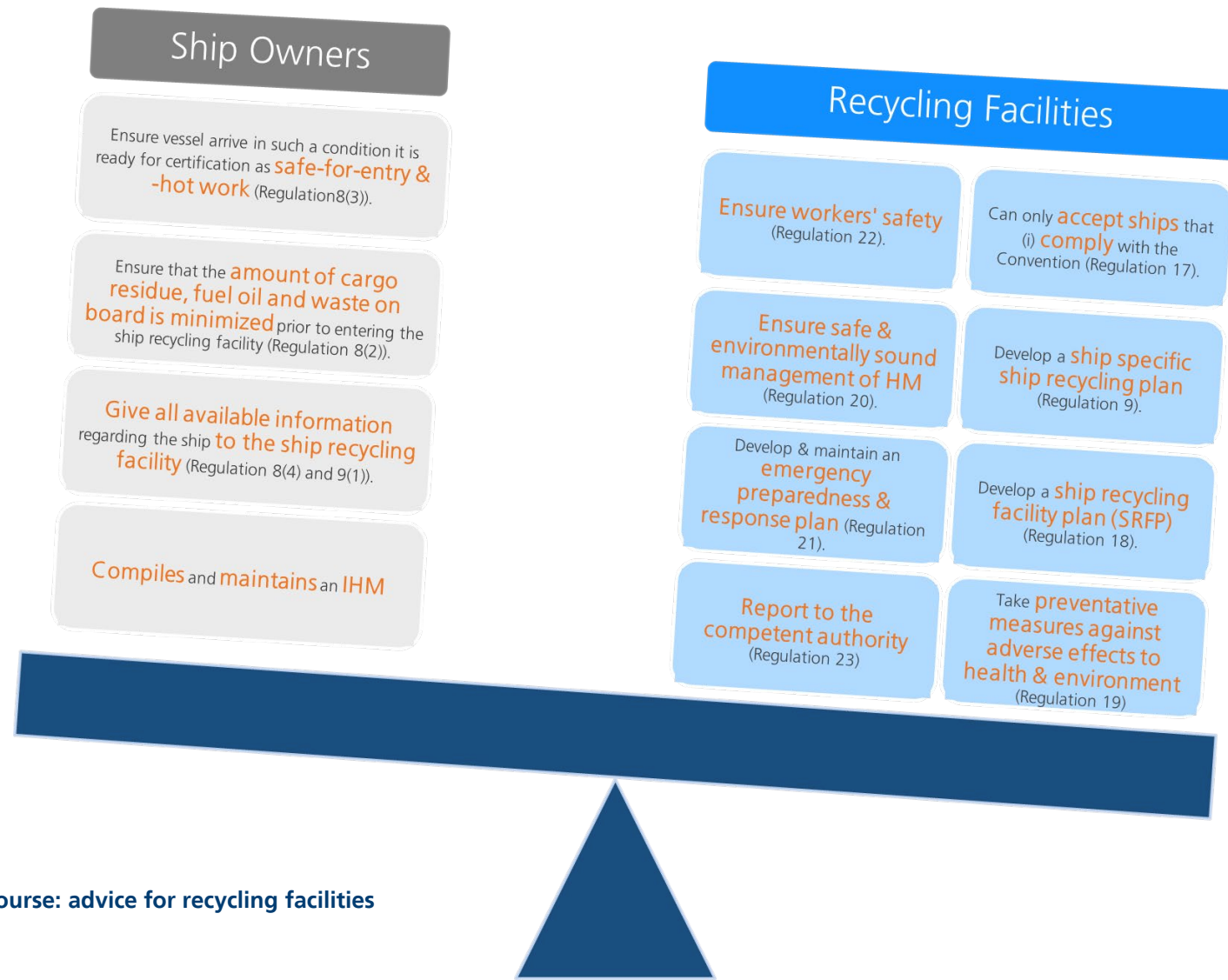
What is required?

- **Ship Recycling Facility Plan**
- Produce **ship specific recycling plans**
- Access to appropriate **medical and waste treatment facilities**.
- Be **authorised** by their competent authority
- Hold a valid **Document of Authorisation for Ship Recycling (DASR)**.

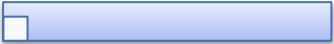
IMO Hong Kong Convention, 2009: Regulations & Guidelines



Hong Kong Convention 2009: The responsibilities of the ship owner & recycling facility



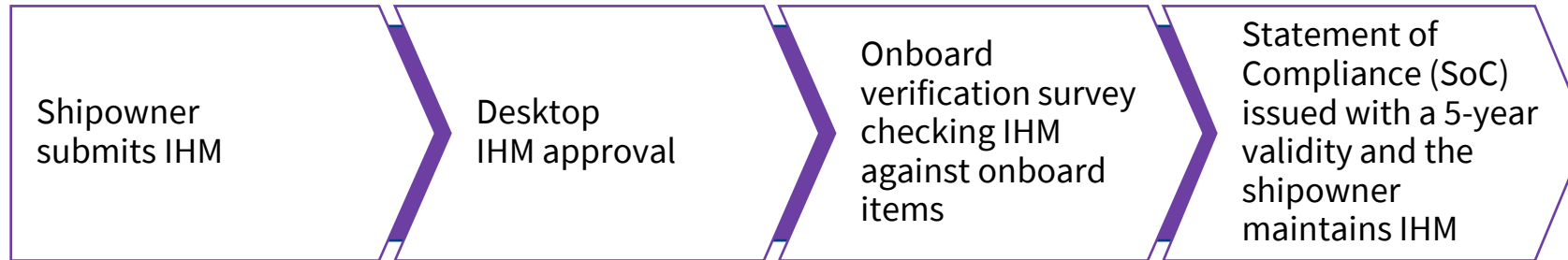
Guidelines for Environmentally Sound Ship Recycling (MEPC.210(63))

Facility Management	Facility Operation	Worker Safety & health	Environmental compliance
☐  ☐ Company information ☐ Training programme ☐ Worker management ☐ Records management	☐  ☐ Facility information ☐ Permits licences and certification ☐ Accessibility of ships ☐ Ship Recycling Plan ☐ Vessel arrival management ☐ Ship Recycling methodology ☐ Reporting upon completion	☐  ☐ Worker health and safety ☐ Key safety & health personnel ☐ Job hazard assessment ☐ Safe-for-entry ☐ Safe-for-hot work ☐ Welding cutting heating and grinding ☐ Drums, containers and pressure vessels ☐ Prevention of falling from heights and accidents caused by falling objects	☐  ☐ Environmental monitoring ☐ Management of Hazardous Materials ☐ Environmentally sound management of Hazardous Materials ☐ Prevention of adverse effects to the environment

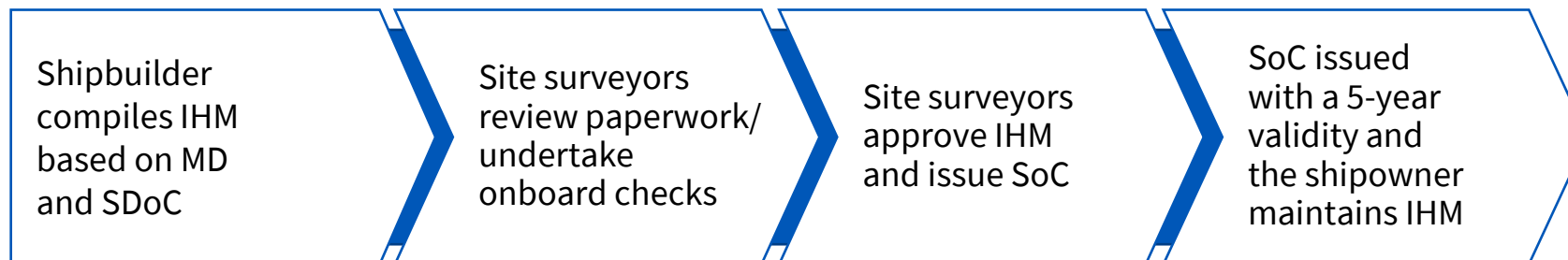


The process for existing vessels and those at build

EXISTING VESSELS



AT BUILD



Statement of Compliance on Inventory of Hazardous Materials (IHM HKC)

(Note: This Statement shall be supplemented by Part I of the Inventory of Hazardous Materials)

Issued under the provisions of the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 (hereinafter referred to as "the Convention") under the authority of the Government of Hong Kong.

Particulars of ship

Name of Ship	Distinctive number or letters	Port of Registry	Gross tonnage	IMO number	Ship Owner Name	Ship Owner Address	IMO registered owner identification number	IMO company identification number	Date of Construction

Particulars of Part I of the Inventory of Hazardous Materials

Part I of the Inventory of Hazardous Materials identification/verification number: []

Note: Part I of the Inventory of Hazardous Materials, as required by regulation 5 of the Annex to the Convention, is an essential part of the Statement on Inventory of Hazardous Materials and must always accompany the Statement on Inventory of Hazardous Materials. Part I of the Inventory of Hazardous Materials should be compiled on the basis of the standard format shown in the guidelines developed by the Organization.

This is to certify:

1. that the ship has been surveyed in accordance with regulation 10 of the Convention;

2. that the survey shows that Part I of the Inventory of Hazardous Materials is in accordance with the Convention.

Completion date of survey on which this Statement is based: []

This Statement is valid until: []

Issued at: Southampton

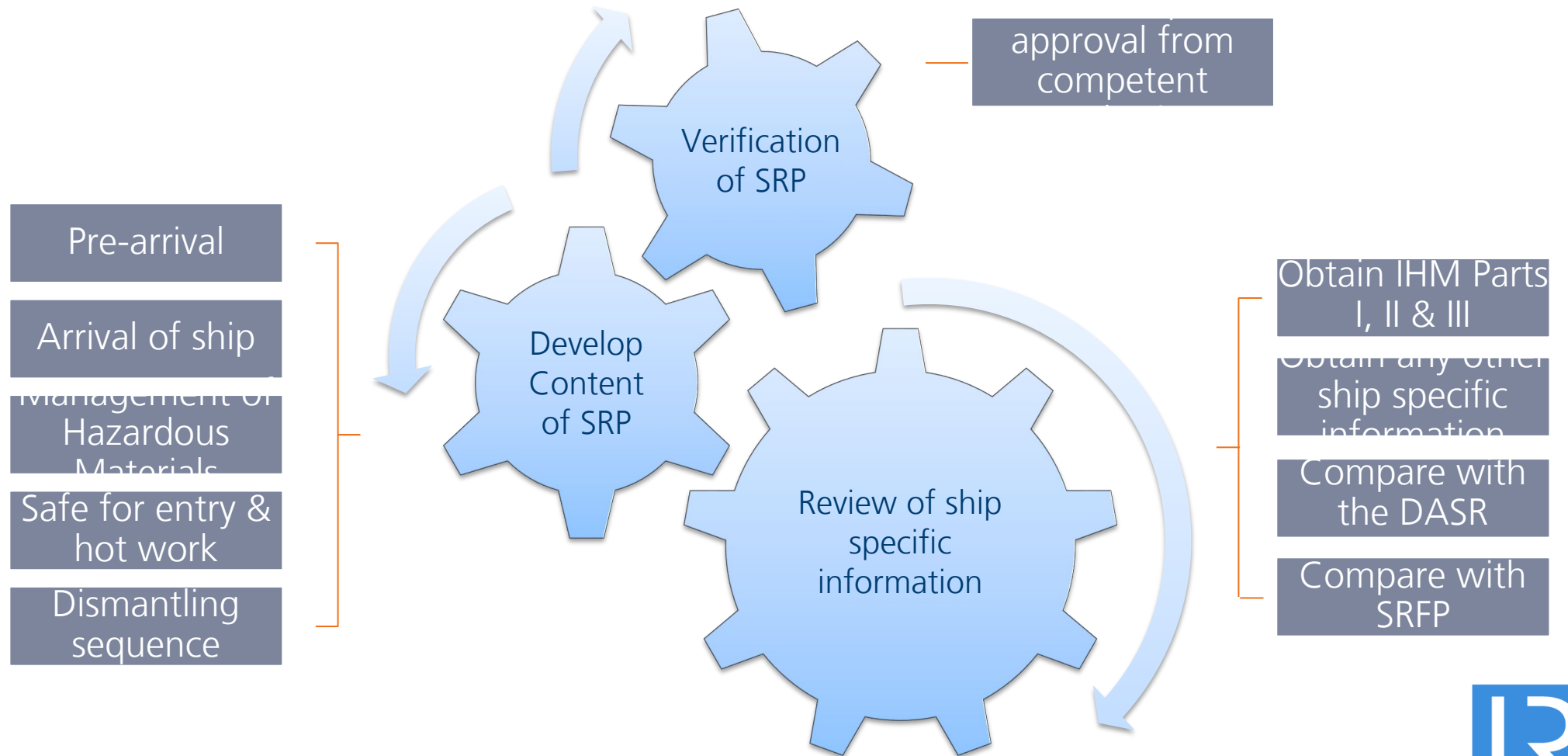
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Form 1001 (2018.02)

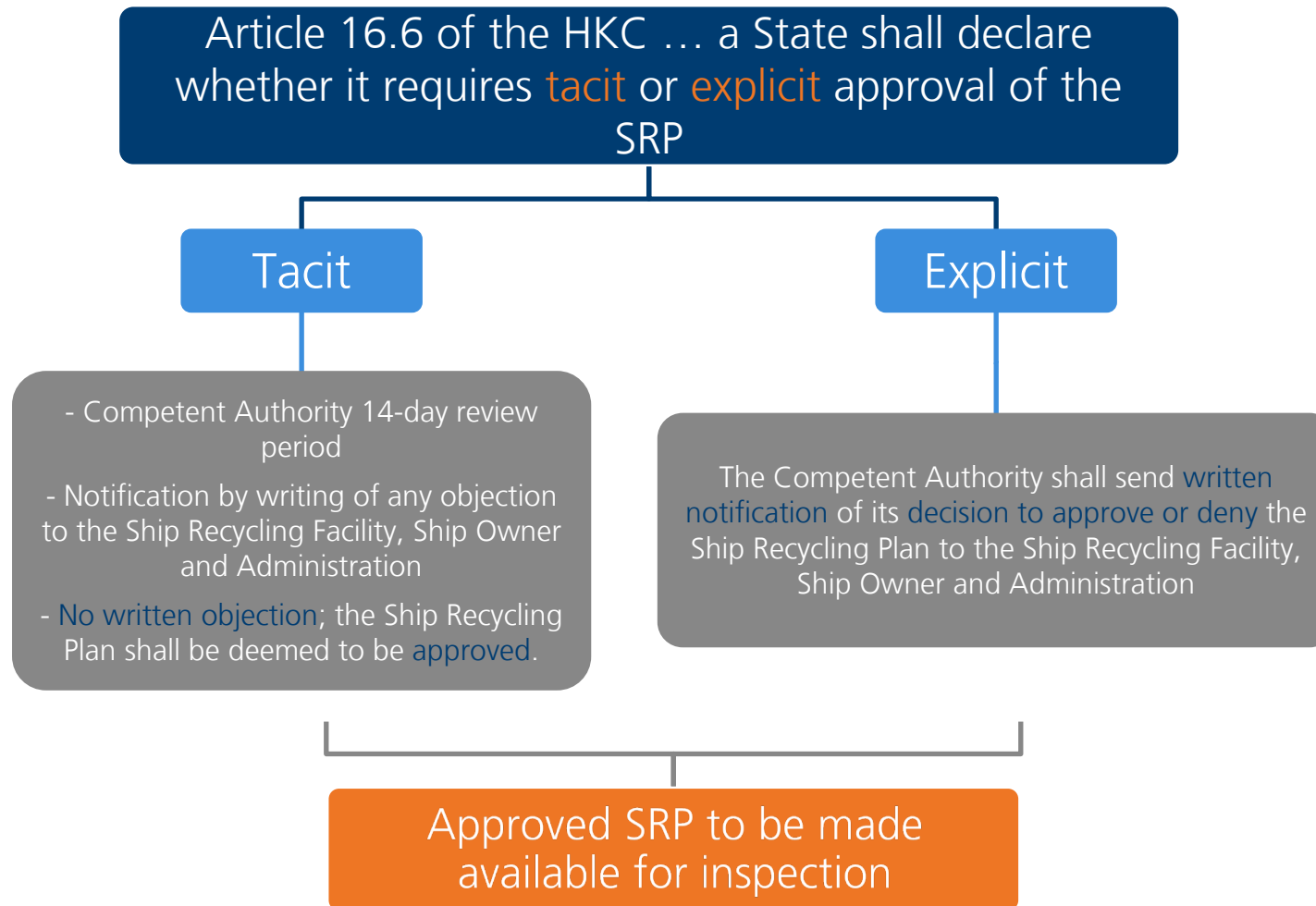
We issue a **statutory certificate** for the majority of EU flagged ships, and a **Statement of Compliance (SoC)** for non-EU flagged ships.



Guidelines for Environmentally Sound Ship Recycling (MEPC.196(62))



Approval of the SRP





Certification

Shipowner

1. Compiles IHM Parts II & III
2. Identifies authorised (or EU Listed recycling facility
3. Submits IHM and ship specific documentation to recycling facility

Ship Recycling Facility

- Prepares ship recycling plan
- Submits Ship Recycling Plan to competent authority for approval
- Submits Ship Recycling Plan and copy of authorisations to ship owner

RO/Flag

4. Request final survey services & submits IHM Parts I, II & III, SRP and any applicable authorisations for recycling facility

- Desktop review of IHM Parts I, II & III which should reflect:
 - Locations
 - Quantities
 - Planned operations
- Desktop review to check
 - SRP accurately reflects IHM
 - SRP establishes safe for entry & hot work procedures
 - SRP is approved by national authority
 - Facility is authorised
- Onboard verification of IHM Parts I, II & III
- Issue International Ready for Recycling Certificate (Form 2497) [3 months validity]

5. Send ship for recycling within 3 months window from issuance of Ready for Recycling Certificate



Sample Process – Ship Recycling, the Responsible Ship Recycling Standard

- **Selection of a HKC-compliant SRF**
- **Provision of IHM Part**
- Provision IHM Part II and III (Table C and D)
- Agreement on processing of recycling, e.g.

Step 1 – Ship Owner



- **Review of ship specific documents by SRF for:**
- Ships dimensions and type
- IHM, DASR, SRF or RRC
- Preparation of ship specific SRP acc. to IMO Guidelines.

Step 2 – Ship Recycle Facility



- **Request Final Survey from Classification Society for issuance of Ready for Recycling Certificate (RRC)**
- IHM Part I, II, III and SRP
- Provision of RRC to SRF

Step 3 – Ship Owner



- **Prepare for inspections and clearance**
- Collection of documents required for clearing the ship
- On arrival at final destination ensure full clearance by relevant governments. Applying HSE Procedure phase

Step 4 – Ship Recycle Facility



- **Arrival of ship at SRF**
- Hired master steers ship under guidance of a pilot
- Ship is secured in its position
- HazMat
- Batteries are delivered to approved recyclers

Step 5 – Ship Recycle Facility



- **Decontamination and recycling of the ship including HSE measures**
- Removal of equipment and components.
- HazMats incl. gas freeing and tank cleaning, removal of oil.
- Dismantling sequence to be prepared bearing in mind that no blocks shall fall in the intertidal zone.
- Removal of equipment and components.
- Material Management:

Step 6 – Ship Recycle Facility



- **Clean up of SRF. After finalization of ship recycling, prepare and send reports and documentation to owner:**
- Incident reports
- Waste manifests
- Completion reports
- Statement of Completion

Step 7 – Ship Recycle Facility



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fer world



Challenges



Requirement of the hong kong convention: IHM surveys and certification are to be carried out and recycling only allowed at authorized facilities



Basel convention and basel ban amendment: controlled movement of hazardous wastes across international borders and prohibits export of from OECD states to non-OECD member states.



Limited growth capacity of yards globally for post panamax vessels



China is no longer accepting foreign flagged ships to be scrapped

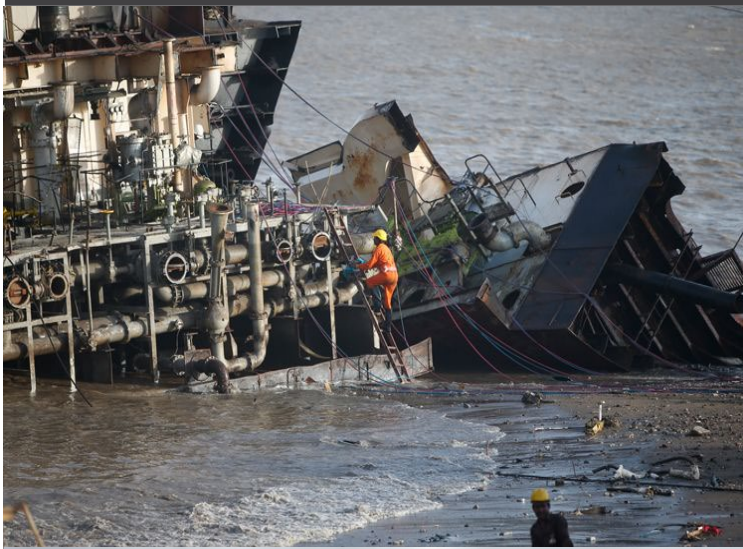


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Working together
for a safer world

Safety and Environment: Pictures 2009 - 2014

Facility Management???



Safety and Environment: Pictures 2009 - 2014

LR Visit in 2010 ???



A ship recycling facility in Bangladesh (Robin Townsend).



A mixed asbestos and glasswool landfill (Robin Townsend).



(HMS) Rodney, Revenge and Nelson being broken in Inverkeithing in 1949.
(© RCAHMS (Aerofilms Collection). Licensor www.rcahms.gov.uk)



Barefooted workers carry plates manually (Robin Townsend).



An oil pit on the beach (Robin Townsend).



Ship Recycling

Practice and regulation today

June 2011



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LIFE MATTERS

to a huge public outcry what had been an unregulated

Safety and Environment: Pictures 2015 – 2020

Facility Management



Improved training and external trainers

Enclosed space entry/rescue training



Working at height training



Fire-fighting training



Working over water training



Health and Wellbeing: Hospital , PPE, Fire Brigade



WASTE ASBESTOS STORAGE AREA.

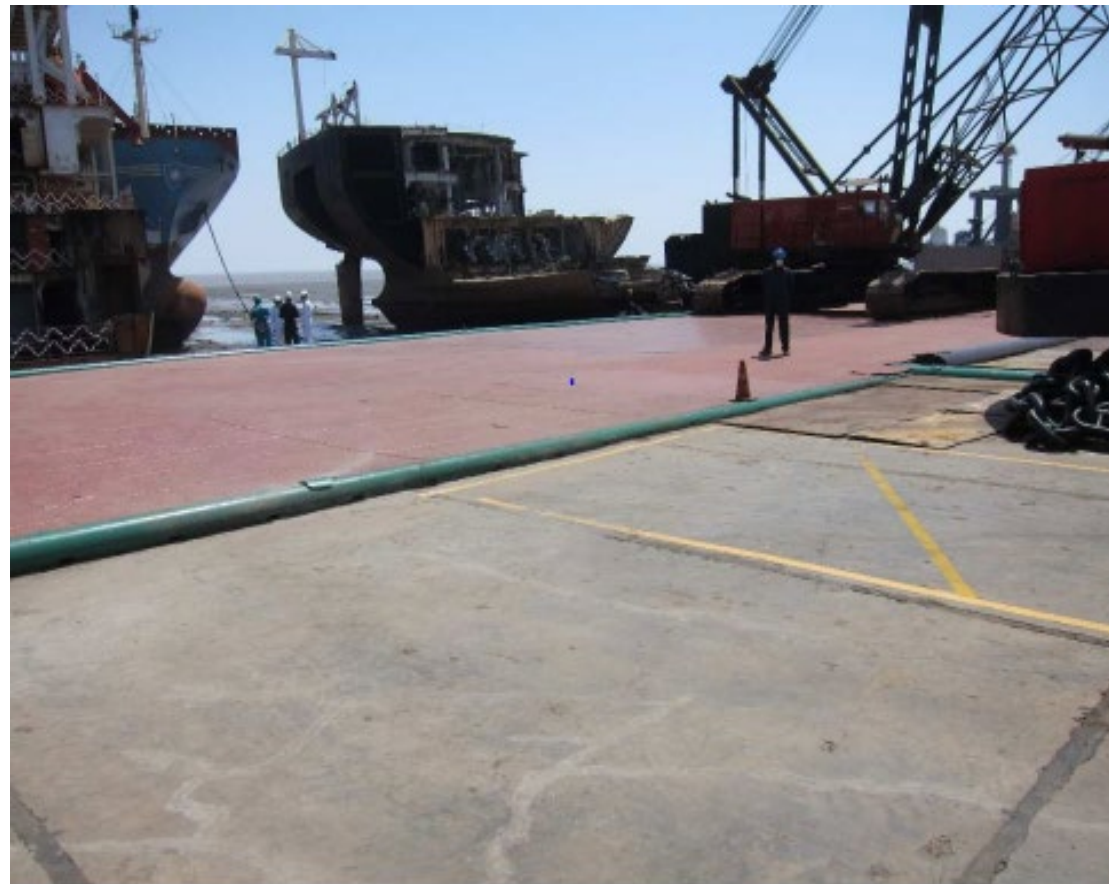


India Ship recycling methodology

Indian yards adopt the beaching/intertidal landing method. Primary cutting of the hull is mainly conducted in the intertidal zone using the interior of ship as an impermeable floor.



Secondary cutting on impermeable floor with drainage.



PPE

Helmets, shoes, safety goggles, gloves and respiratory masks worn by cutters.



Trained workers with full body PPE.



Health and Wellbeing: Accommodation

Ruang Tamu



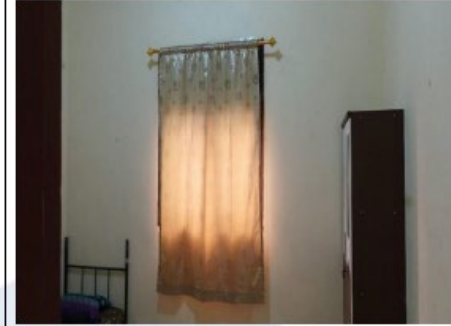
Kamar 1



Kuang tamu



Kamar 1



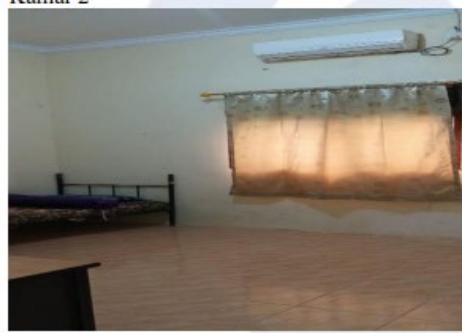
Kamar 2



Ruang Makan



Kamar 2



Ruang Makan



Dapur



Kamar Mandi



Dapur



Kamar Mandi



Health and Safety: Work at Height, Over Water Handling of Hazardous Materials

Rescue equipment

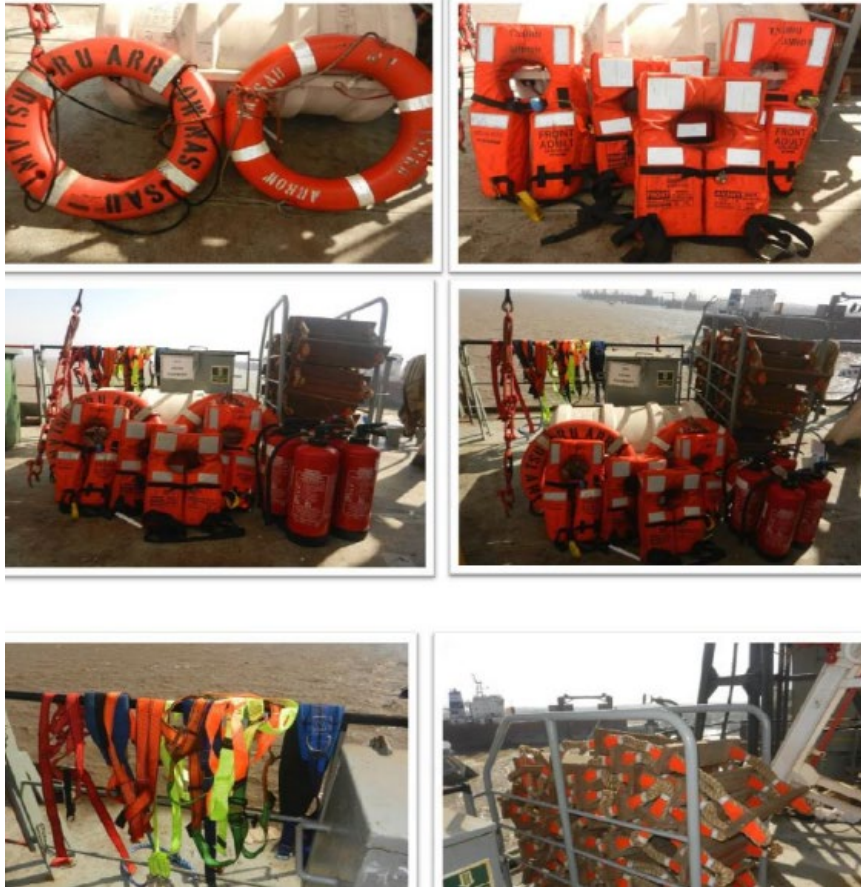


Fig: PPE provided to the worker handling PCB



Pictures of Enclosure Room for removal of ACM on Vessel



Enclosure Room from outside

Enclosure room from outside



Removal of ACM with spraying of water

Removal of ACM with continuous vacuum



Removal of ACM with spanner

Vacuuming done across the area after the work is completed

Developments in Infrastructure of LR Certified yards- HKC Compliance+ EUSRR (Present)

Impermeable re-enforced concrete with drainage, use of double layered steel structures in intertidal zone, use of crane barges, heavy-duty cranes & winches, slag catchers, better facilities for workers, correct PPE and downstream waste mgmt.

2019



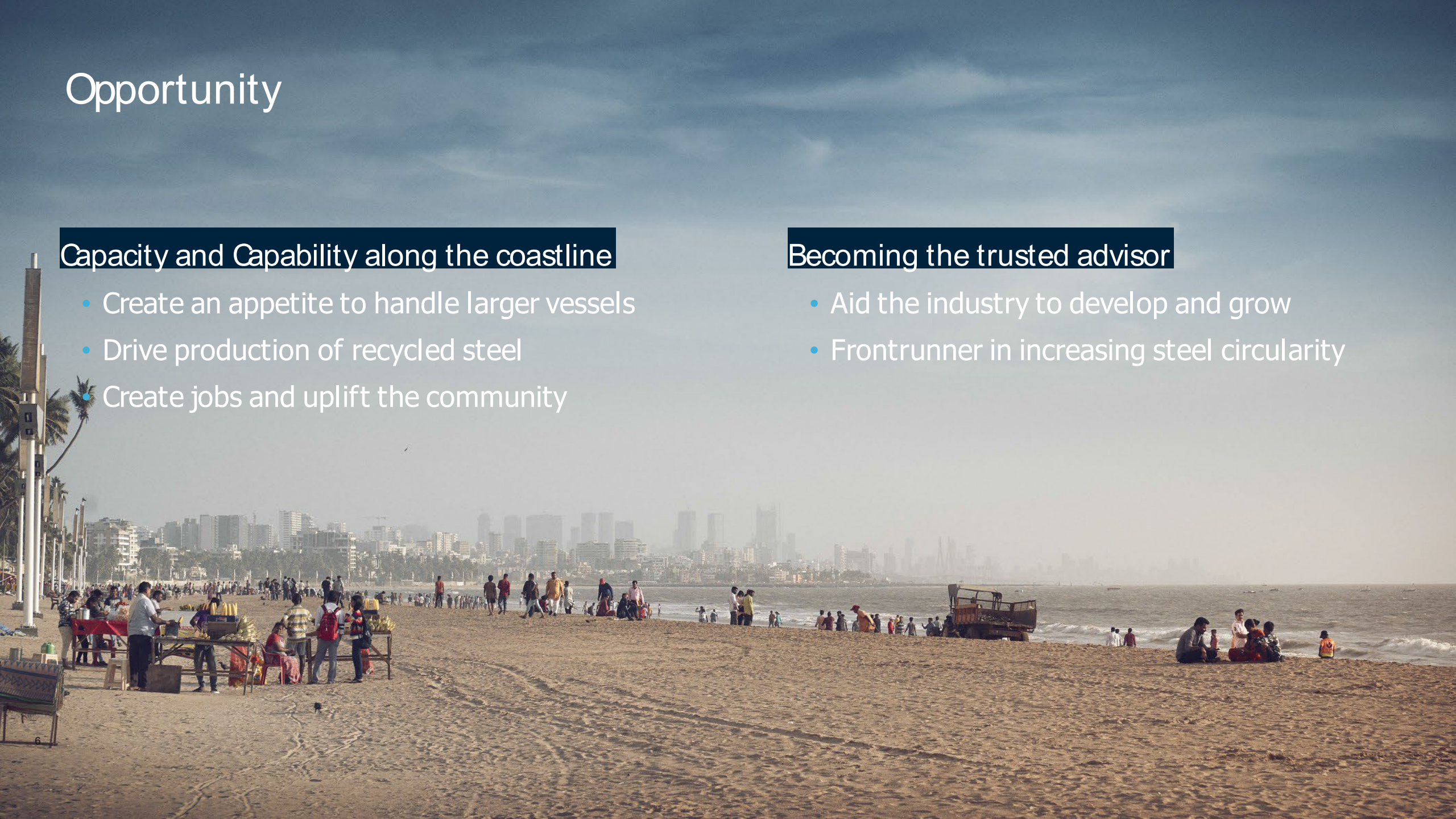
Opportunity

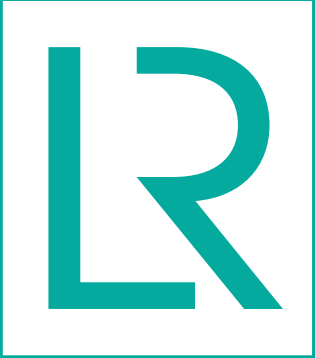
Capacity and Capability along the coastline

- Create an appetite to handle larger vessels
- Drive production of recycled steel
- Create jobs and uplift the community

Becoming the trusted advisor

- Aid the industry to develop and grow
- Frontrunner in increasing steel circularity





Thank you

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