

Category: Instruction No.: 5-2020

Operational Nautical Our ref. and file No.: 2020/781

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IHM-certification and the use of Supplier Declaration of Conformity (SDoC) and Material Declaration (MD)

1. Purpose

- 1.1. Instructions to Class (IC) 5-2020 aim to clarify what need to be verified by ROs relating to the Company's¹ documentation associated with identifying and specifying materials comprising the inventory of hazardous materials (IHM) specific to each ship and keep such inventory current and up to date.

2. Application

- 2.1. IC 5-2020 applies to ships registered in the Norwegian Ordinary Ship Register (NOR) or the Norwegian International Ship Register (NIS).

3. Definitions

- 3.1. N/A

4. References

- 4.1. Agreement of 1 June 2002 between the Ministry of Trade, Industry and Fisheries and Ros' concerning surveys of ships registered in a Norwegian ship register (the Agreement) article 2.2.
- 4.2. Norwegian Regulation 6 December 2018 No. 1813 on Recycling of Ships and mobile offshore units which, inter alia incorporates Regulation (EU) 1257/2013 on ship recycling into the Norwegian legal order.
- 4.3. Annex I paragraph 3.3.6
- 4.4. Annex II paragraph 3.2.6

5. Background

- 5.1. In accordance with Regulation (EU) 1257/2013 Article 5, the IHM of a ship should be compiled, taking into account the IMO guidelines developed for The Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009.

¹ Reference is made to SOLAS Reg. IX/1.2

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- 5.2. The European Maritime Safety Agency (EMSA) has developed a best practice guidance on IHM largely based on the relevant IMO-guidelines and an indicative list of items possibly containing hazardous materials has been developed.
 - 5.3. Information about hazardous materials is foreseen to be provided to the Company by suppliers using standardized documents; Supplier's Declarations of Conformity (SDoC) and Material Declarations (MD).
 - 5.4. The NMA considers that collecting, considering and properly maintaining SDoCs and MDs for all items taken on board or all items on the indicative lists, in every case for every company, cannot be regarded as an absolute requirement.
 - 5.5. Noting article 5 of Regulation (EU) 1257/2013, the NMA considers that other solutions ensuring reliable information on the presence of listed hazardous materials on board ships can be accepted. Such solutions could include the use of purchase order procedures which require suppliers to provide SDoC and MD in the applicable formats whenever the supplied item contains specifically listed materials, in addition to the use of general declarations from suppliers.
 - 5.6. Neither the EMSA-guidelines nor the IMO-guidelines are mandatory under international law. NMA is requesting and will accept declarations which positively document hazardous materials which comprise the IHM-register.
 - 5.7. The NMA considers that adequate procedures to ensure proper maintenance of the IHM can be achieved without having to collect declarations when threshold values pertaining to items delivered to the ship are not exceeded.

6. Repeal

- 6.1. None

7. Item

- 7.1. RO shall verify that the Company requires and ensures that suppliers identify and declare, when relevant, the presence of hazardous materials which exceed the relevant threshold values, using the applicable formats.
- 7.2. RO shall verify that the Company's practices for developing and maintaining the IHM be supported by the Company's general procedures and quality management; i.e. by
 - 7.2.1. using standardized text in Company purchase orders;
 - 7.2.2. accepting general declarations from suppliers;
 - 7.2.3. implementing specific verification procedures for high-risk items.

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