

Hong Kong Convention now effective on 26 June 2025: Are you aware of the requirements & applicability?

Newsletter Update as on 26 June 2025

status in June 2023, thereby fulfilling the minimum ratification requirement. Currently, a total of 24 states have become Contracting States^[2] to the HKC.

In accordance with the established regulations, all newly constructed and existing vessels are mandated to create IHM Part I by June 26, 2030, and must secure either the International Certificate (IC) or the Statement of Compliance (SoC), depending on which is applicable. Additionally, the Ship Recycling Facility is required to have the Document Authorization of Ship Recycling Facility (DASR), which will be issued by the Administration or a Recognized Organization.

The preliminary survey must be aligned with the renewal surveys mandated by other relevant statutory surveys, adhering to the principles set forth in the Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), 2011.

Furthermore, an International Ready for Recycling Certificate (IRRC) will be granted to the vessel during its recycling phase, necessitating the preparation of IHM Parts I, II, and III, the Ship Recycling Plan, and the Certification/DASR of the Ship Recycling Facility during the final survey.

APPLICABILITY:

HKC applies to:

- Ships^[1] more than 500 gross tonnage
- Ships^[1] flying with the flag of a Party
- Ships^[1] flying with the flag of a non-Party operating under Party's authority
- Ship Recycling Facilities operating under Party's jurisdiction

IHM MAINTENANCE REQUIREMENTS

In accordance with the citation from MEPC.379(80) sections 4.3.1 and 4.3.3, it is essential that the IHM Part I is properly maintained and updated. This includes ensuring the continuity of the Inventory, particularly in relation to the name, flag, and shipowner, which should reflect the most current particulars of the ship^[1].

Shipowners are required to develop an IHM Maintenance procedure and/or manual that is incorporated into the shipowner's safety management system. Additionally, they must designate an individual responsible for IHM Maintenance, commonly referred to as the IHM Designated Person (IHM DP). The standard procedure for maintaining the Inventory involves gathering a Material Declaration (MD) and a Supplier Declaration of Conformity (SoC) for items suspected of containing hazardous materials supplied to the ship^[1] for new installations and repair activities. An indicative list of suspected items is available in the MEPC.379(80) guidelines.

If a hazardous material is identified above the designated threshold values in a product, the IHM DP is required to update the Inventory and issue a new revision that includes the date and revision number. The IHM DP must also document the activities performed in a change log.

To effectively manage IHM Maintenance, which is centralized, fully digitalized, and meticulously maintained, ship owners or managers may engage the services of a reliable third-party service provider. This provider will manage all administrative aspects of IHM Maintenance at either a vessel or fleet level.

During the IHM renewal survey, in accordance with Regulation 10.1.2, the survey must confirm that Part I of the IHM meets the convention's requirements. This necessitates that both the shipowner and the ship ensure the Inventory is properly maintained to prevent any deficiencies from being identified during the survey.

PORT STATE CONTROL (PSC) PROTOCOL

Inspections by Port State Control:

Inspection	Inspection Scope
General	Limited inspection to International Certificate (IC) / Statement of Compliance (SoC) for IHM and International Ready for Recycling Certificate (IRRC). (If the certificate is valid, it shall be considered sufficient for the inspection to be approved)
Detailed	A detailed inspection may be carried out when no valid certificate is available or there exists a lack of clarity/evidence of: - The condition of the ship or its equipment does not correspond with the particulars of that certificate, Part I of the IHM or both - There is no procedure implemented on board the ship for the maintenance of Part I of the IHM.

Deficiencies by Port State Control:

Deficiency Type	Grounds for Non-Compliance
Detainable	- No International Certificate (IC) / Statement of Compliance (SoC) of IHM - No International Ready for Recycling Certificate (IRRC) - No control measure of HazMat in table A (e.g. Asbestos)
Non-Detainable (Reported to administration on deficiency and action to be taken)	IHM Maintenance

It is important to note that the Paris Memorandum of Understanding on Port State Control (Paris MoU) is incorporating the HKC as a pertinent instrument. This incorporation is set to be implemented from July 1, 2025, into its inspection framework, and shipowners must ensure that their vessels adhere to the stipulations of the convention.

For more information on Maritec-Naias IHM Compliance Services visit [IHM & Recycling](#) on our website.

Foot Notes:

^[1] Ship can be categorized under "New Ship" and/or "Existing Ship" based on the following:

- 26 June 2025 (Contract date)
- 26 December 2025 (Keel laid, no contract in place)
- 26 December 2027 (Delivery date)
- Existing Ship: a ship which is not a new ship based on above parameters

^[2] Contracting States: Bangladesh, Republic of the Congo, Ghana, India, Japan, Liberia, Marshall Islands, Pakistan, Panama, São Tomé and Príncipe, Serbia, Türkiye, Belgium, Croatia, Denmark, Estonia, France, Germany, Luxembourg, Malta, Kingdom of the Netherlands, Norway, Portugal, Spain.