

Industry Guidance to Ship Suppliers and Shipowners on

Materials Declarations for Inventories of Hazardous Materials



November 2022

1 Background

The development and maintenance of the Inventory of Hazardous Materials (IHM) is the key requirement for shipowners under the Hong Kong Convention (HKC) and EU Ship Recycling Regulation (EUSRR). Whilst the HKC has not yet come into force, the EUSRR has, and has wide application (to shipowners within the EU, vessels flagged within the EU and non-EU vessels calling to EU ports).

Fundamental to the development and maintenance of the IHM is the collection of available information relevant to the ship's construction and equipment through the Material Declaration (MD) and the Supplier's Declaration of Conformity (SDoC). These are required by the EUSRR (and the HKC when it comes into force) to be provided by the suppliers of relevant parts and equipment delivered to the shipyard (IHM-development for new ships) and shipowners (IHM-Maintenance).

The IHM requirements apply for the entire life cycle of a ship, and there are specific provisions relating to each stage in the ship's life to ensure that hazardous materials can be identified as far as possible, and their disposal properly planned in the ship recycling process.

This *Industry Guidance* concerns only Part I of the IHM which covers the "structure and equipment of ships" and which needs to be prepared and maintained during the operational lifetime of the ship. Part I has three subparts and this guidance addresses Parts I-2 and I-3 only. This guidance does not address Part I-1 which is on paints and coating systems.

More extensive guidance on the development of an IHM and compliance with the HKC and EUSRR can be found in the [*Transitional Measures for Shipowners Selling Ships for Recycling*](#).

2 Purpose

This *Industry Guidance* is specifically aimed at clarifying the exchange of information between shipowners and suppliers through the supplier's submission of MDs and SDoCs. It will assist shipowners and suppliers in understanding and complying with their obligations with respect to MD and SDoC under the HKC and EUSRR, reducing the administrative burden for shipowners and suppliers, and ensuring the provision of accurate information necessary for the maintenance of IHM.

The application of the EUSRR and voluntary compliance with IHM requirements under HKC or through companies' environmental policies, has caused a significant increase in shipowners' requests for MDs to suppliers. As a consequence of this willingness to demonstrate compliance with the EUSRR and HKC, shipowners and service providers to whom IHM management has been delegated have made MD requests for equipment delivered to the ship, in excess of what is required under the EUSRR or HKC regimes. This has placed a considerable administrative burden on suppliers, and can make the maintenance of the IHM by the owner significantly more complicated. Similarly, a lack of awareness by suppliers of their responsibilities in providing accurate MDs on request can also impact on the accuracy of IHM.

3 Statutory Framework

The EUSRR and the HKC rely upon IMO Resolution MEPC.269(68) – 2015 Guidelines for the Development and maintenance of the Inventory of Hazardous Materials (“the IMO-Guidelines”), which include the requirement for suppliers to provide MDs and SDoCs. For the purposes of implementing the EUSRR, the European Maritime Safety Agency (EMSA) has also issued *Best Practice Guidance on the Inventory of Hazardous Materials* (the EMSA Guidance).

The purpose of the MD is to inform the shipowner whether or not relevant items supplied by the supplier contain hazardous materials. An MD must be supplied where the item will be part of the ships structure or equipment, regardless of whether or not hazardous materials are present (i.e. “Zero Declaration”).

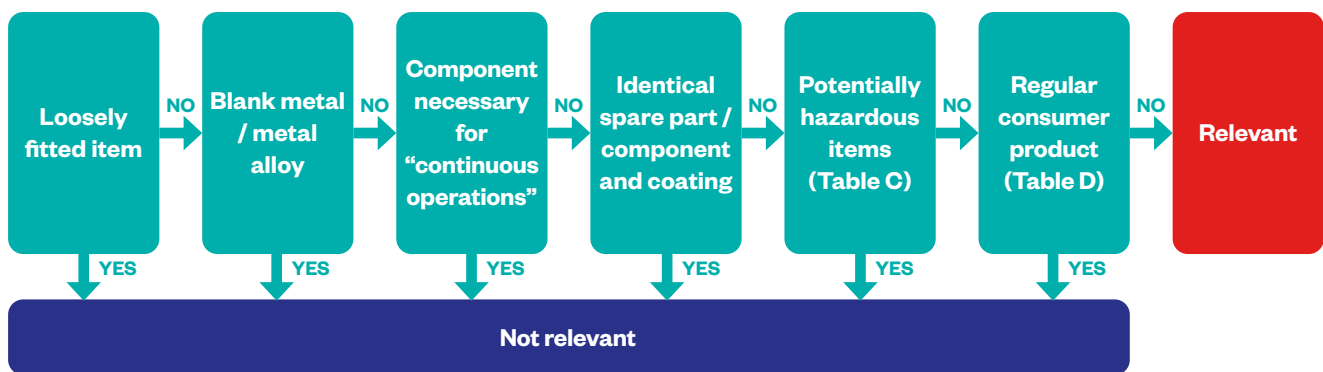


Figure 1: Flow diagram on Material Declaration Relevance

However, an MD is not required for:

- “Loosely fitted equipment” that is not part of the permanent ship’s structure (MEPC.269(68) 3.2.3);
- Materials listed in Table B that are inherent in solid metals or metal alloys, such as steels, aluminium, brasses, bronzes, plating and solders (MEPC.269(68) 3.3.1);
- Components necessary for continuous ship operations (e.g. additives) (MEPC.269(68) 4.5.3);
- Printed Circuit Boards (MEPC.269(68) 3.3.2);
- Identical parts, components and coatings (MEPC.269(68) 4.3.2);
- Potentially hazardous items (Table C) in stores and as waste (MEPC.269(68) 3.2.2); or
- Regular consumer products (Table D) (MEPC.269(68) 3.2.2).

The full list of the hazardous materials to be documented is reproduced in the tables at Schedule A of this *Industry Guidance*.

Appendix 1 of the IMO Guidelines provides details of the relevant hazardous materials. The EUSRR lists two additional hazardous materials, which can be found in Appendix 1 and 2 of the EUSRR. These are:

- Perfluorooctane sulfonic acid (PFOS) (Appendix 1); and
- Brominated Flame Retardant (HBCDD) (Appendix 2).

Annex B to the EMSA Guidance provides the threshold levels for these additional hazardous materials.

Appendix 1 of the IMO Guidelines contains Tables A, B, C and D, which provide the materials and items that must be recorded at the various stages of a ship's life. The following table provides an overview of the requirements:

Inventory of Hazardous Materials	Building and operation	Prior to recycling	
	Part I Structure and equipment	Part II Hazardous wastes	Part III Stores
Table A Materials Mandatory for all ships and installations	✓		
Table B Materials Mandatory for all ships and installations, voluntary for existing ships	✓		
Table C Materials Potentially hazardous items		✓	✓
Table D Materials Regular consumable goods potentially containing hazardous materials	Excluded items		✓

Tables A and B correspond to IHM Part I, which has to be certified and then maintained by the shipowner during the operational life of the ship. The sample MD at Schedule C of this *Industry Guidance* reflects Tables A and B and the EMSA Guidance for the two additional substances as required under EUSRR.

For the preparation of a ship for recycling Parts II and III of the IHM apply. The level of detail to be recorded is lower and no additional declarations in the form of MD and SDoC are required from suppliers for such products. It is therefore unnecessary to consider Tables C and D for IHM Maintenance and related MDs or SDoCs.

Sections 6 and 7 of the Annex to the IMO Guidelines set-out the supplier's obligations to provide the MD and SDoC (Appendices 6 and 7 of the IMO Guidelines provide examples of the MD and SDoC). Slightly revised versions of these documents including the two additionally required substances by EUSRR are provided at Schedule C and B of this *Industry Guidance*.

3.1 Responsibility of the shipowner

Part I of the IHM when initially developed, approved and certified, must be maintained throughout the life of the ship. Updates to IHM Part I are required "if any machinery or equipment is added to, removed or replaced or the hull coating is renewed according to the requirements for new ships". As such an MD and SDoC are to be provided by suppliers for any such items supplied.

IHM Part I must be updated during the vessel's life cycle, if "new" items are incorporated into the vessel's permanent structure or other relevant changes to it occur. IHM Part I does not require updating if e.g. an identical replacement occurs.

Updating of IHM Part I is made possible by the suppliers' MDs, and MDs that report hazardous materials which are not presently documented in IHM Part I will need to be recorded in it as part of IHM maintenance. Changes to IHM are also required in case of relocations or removals of hazardous items falling under scope of IHM Part I.

Shipowners should have a system in place to ensure that MDs are requested only when necessary, that they are received from suppliers in completed form, that they are reviewed and that IHM Part I is updated as necessary. Only a system that achieves all of this will enable shipowners to be compliant with their obligations under the EUSRR, and in due course the HKC.

3.2 Material Declaration Requests

MDs are fundamental to the IHM and, with time, the provision of MDs with the relevant equipment should become standard practice within the procurement and supply chain. Until that point, the process starts with the shipowner making a request to the supplier for those order items where an MD is required.

To avoid unnecessary administration for suppliers and owners, it is important to ensure that MD requests are relevant as per requirements of the HKO/EUSRR.

Those tasked with maintaining the IHM Part I should identify those order items where an MD is required. In practical terms MDs are not necessary for stores, consumables, metals and loose equipment or otherwise exempted items (see Section 2 and Schedule A). All requests for MDs should be carefully considered, reviewed, and MDs should be provided as necessary. These guidelines and in particular Schedule A, should be consulted if uncertainty arises between the supplier and shipowner on the necessity to provide a MD. Where a supplier considers that an MD is not required, they should provide the shipowner with a written explanation for their further consideration.

Some typical examples of MD requests that are often made, where no MD is in fact necessary, include:

1. Tools (whether hand, mechanical, electrical or diesel powered);
2. Televisions, PCs or related equipment, toaster, microwave, fridge etc – all household-like electrical equipment;
3. Identical replacement parts for existing machinery;
4. Uncoated metal parts like ball bearings, piston rings, push rods, steel plates;
5. Provisions;
6. Linen or clothing;
7. Ropes and lines;
8. Consumables (Table D); and
9. Food & beverages.

In addition to the above, a risk-based approach for MDs may be additionally and mutually agreed between shipowners and suppliers for universal materials (e.g. gasket sheets) for ensuring that no delivery contains Table A materials.

It should be noted that a good approach to IHM Part 1 maintenance is to aim for reduction of hazardous materials onboard. However, some products cannot be produced without substances listed in Table B (e.g. lead-acid batteries) and contractual requirements where suppliers are obliged to deliver only products which are free of any and all hazardous materials are neither appropriate nor practicable.

3.3 Role of IHM Service Providers

In accordance with the IMO and EMSA Guidance, the shipowner should nominate a designated person for IHM Maintenance. The designated person may be an internal appointment (ashore or onboard), or the role may be assigned to an external consultant. In both situations, the duties of the designated person should be incorporated in the shipowner's quality management system. Shipowners may use the services of external consultants or service providers to maintain IHM for the vessels, and in such circumstances, liability for the accuracy of the IHM remains with the owner.

3.4 Responsibility of the supplier

On receipt of a request from a shipowner or their representative for an MD and SDoC, suppliers should identify and declare in an MD whether or not the materials listed in Table A and Table B (and the two additional substances introduced by EUSRR) are present above the threshold value specified in Appendix 1 and 2 of the IMO Guidelines and Annex B of the EMSA Guidance. If the required information is not available, the supplier should obtain it from its sub-supplier. The supplier to the vessel (known as the Tier 1 supplier) shall be responsible for the information provided to the shipowner and must issue its own MD and SDoC. The supplier shall not pass on documents issued by its sub-suppliers, but should retain all supporting documents provided to him by its sub-suppliers.

Under both the EUSRR and the HKC the supplier is only obliged to provide an MD where the item supplied is one that requires an MD. Where an MD request is received for an item that does not require one then the supplier should advise the shipowner accordingly and reference these guidelines, in particular section 3.4.6.

3.4.1 SDoC

The SDoC is a supplier specific document, confirming that all associated MDs comply with the statutory requirements (HKC, EUSRR and Res.MEPC.269 (68)). Suppliers can use the same form of SDoC for all their customers, which describes the legal instruments and, if applicable, the supplier's own management approach. A specimen SDoC is found at Appendix 7 of the IHM Guidelines, and is attached as Schedule B - Form of SDoC to this guidance.

ISO 30005 standard offers a unique numbering system for MDs and SDoCs.

3.4.2 Scope of SDoC

The supplier must state the extent of the coverage provided by a SDoC, as follows:

1. Limit its coverage to a specific order;
2. Cover repeated orders of similar products; or
3. General applicability for all orders by any customer.

Where a supplier selects to issue a SDoC to cover all MDs issued by the supplier to the customer, this can usefully limit the administrative burden for otherwise issuing multiple SDoCs.

3.4.3 SDoC - ID Number

Each SDoC must contain a SDoC - ID Number. This is very important as it forms the essential link between the SDoC and all associated MDs. Every MD has to have a clear reference to an SDoC, and this is achieved by each MD stating a valid SDoC - ID number. The supplier should choose a unique numbering system for SDoCs.

3.4.4 How to complete a SDoC

The following diagram demonstrates how suppliers should complete a SDOC.

SUPPLIER'S DECLARATION OF CONFORMITY

for Material Declaration Management

(according to IMO Resolution MEPC.269(68) and EU Ship Recycling Regulation)

Company name

1) SDoC ID No. SD-MMYYYY-AbrSuppl.-onoingNo.

2) Issuer's name: _____

Issuer's address: _____

3) Scope of SDoC

☐	Valid for this order and listed product(s) only
☐	Valid for repeated order of listed product(s) only
☒	Valid for all orders and customers (typical choice)

4) The object of declaration described above is in conformity with the requirement of the following documents:

Document No.	Title	Edition	Date
MEPC. Res 269(68)	Guidelines for the Development of Inventory of Hazardous Materials	2015	15.05.2015
SRCONF 45	International Hong Kong Convention for the Safe and Environmentally Sound Recycling of Ships	2009	19.05.2009
ISO 30005	Ships and marine technology — Ship recycling management systems — Information control for hazardous materials in the manufacturing chain of shipbuilding and ship operations	2012	01.05.2012
REGULATION (EU) No 1257/2013	Regulation of the European Parliament and of the Council of 20 November 2013 on ship recycling and amending Regulation (EC) No 1013/2006 and Directive 2009/16/EC	2013	20.11.2013
related to: REGULATION (EU) No 1257/2013	EMSA's Best Practice Guidance on the Inventory of Hazardous Materials	2016	28.10.2016

6) Additional Information: _____

Signed for and on behalf of: _____

(Place of issue)

7) _____
(Name, function)

Object(s) of the declaration:

- 1) _____
- 2) _____
- 3) _____
- 4) _____
- 5) _____
- 6) _____
- 7) _____
- 8) _____
- 9) _____
- 10) _____

(Date of issue)

(Signature)

(Signature)

(Signature)

(Signature)

Choose a unique numbering system for SDOCs

Make entries only if scope of this SDoC is limited to specific products. If SDoC is not limited to specific products, leave this section blank or insert under 1) "all products supplied"

Here, references to the legal requirements (SR/CONF/45 and Res. MEPC.269(68), etc.) and certificates or quality manuals (e.g. ISO 9001, ISO 30005) applicable for the provision of IHM related information and documents are contained. The most common requirements have been included, and can be amended if necessary

Company name or stamp

Signature and date of issue are essential to include

Name and function are essential to include

3.4.5 Material Declarations

The Material Declaration is a product-specific document and a “check list” on whether or not any of the homogenous materials (see 3.4.7) contained in a supplied product contain any of the listed hazardous materials above the related threshold levels (if applicable). It is important to understand that the MD is required whether or not hazardous materials are present. All MDs must refer to a valid SDoC, by reference to the SDoC - ID Number.

3.4.6 Completing a Material Declaration

When a product does not contain a hazardous material, or where it is present in a concentration below any specific threshold value, a “No” entry should be made and no further details are required in the respective column(s). In such cases a group of similar products can be covered by a single MD (e.g. O-Rings of different dimensions).

Where a listed hazardous material is contained (above the given threshold level – if any) a “Yes” entry is required and further details are to be provided in the columns “quantity” and “unit” and further specified in the far right column. In such cases, a single MD must be issued for each product, because it is necessary to identify the quantity of hazardous materials and that most likely varies in different products.

The following is important to note:

- “SDoC ID-No.” in the MD form and its associated SDoC form must be the same;
- “Company name” in MD & “Issuer’s name” in SDoC must be the same; and
- “Address” in MD and the “Issuer’s name” in SDoC form must be the same.

3.4.7 Homogeneous materials

A homogeneous material is a material of uniform composition throughout that cannot be mechanically disjointed into different materials, meaning that the materials cannot, in principle, be separated by mechanical actions such as unscrewing, cutting, crushing, grinding and abrasive processes. The following provides examples of homogeneous materials: figure 1 shows the layers of paint and figure 2 a cable with six different homogenous materials.

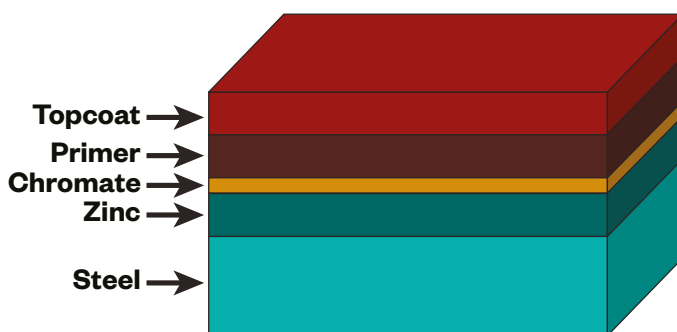


Figure 2: Five homogenous materials

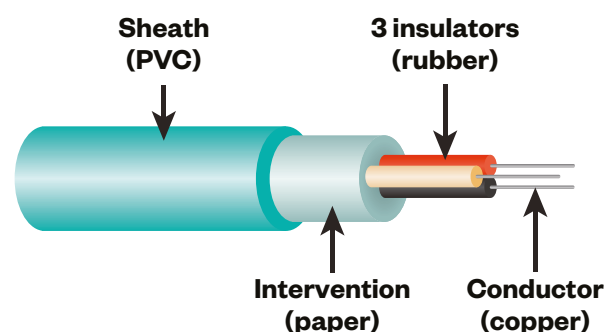


Figure 3: Six homogenous materials

Where a listed hazardous material is contained above its specific threshold level in a homogeneous material, in the “Quantity-section the weight of the homogenous material containing hazardous materials is to be specified (not the weight of pure hazardous material itself). In the right column of MD the exact location and material containing the hazardous material is to be specified. For further clarity, a diagram or drawing can be attached.

3.4.8 Further Points to Note

In addition to the information provided above, the following additional information should be noted:

There are widely varying national definitions for “asbestos free”. For the purposes of HKC and EUSRR any concentration > 0.1% of the six different types of asbestos is relevant for IHMs. Please check carefully.

For RoHS-compliant electronics and electrical appliances required information is mostly already available (Table A and Table B line 1-6).

Suppliers may find it convenient to retain a library of previously submitted MDs for future use. However, very great care must be taken and suppliers must be aware that the specifications between different sub-suppliers may vary, or specifications may be changed during production without further notice.

3.4.9 MD – ID Number

All MDs should carry a unique MD – ID Number.

3.5 How to complete a MD

The following diagram demonstrates how suppliers should complete a MD.

MATERIAL DECLARATION

Type 1: Self Declaration

<Date of declaration>
Date:

<MD ID Number>
MD-ID-No.

<Other information (e.g. client, shipbuilder, hull no. if applicable)>
Remarks

<Product information>

Product Name	Product Number	Delivered Unit		Product Information
		Amount	Unit	

<Material information>

This material information shows the amount of hazardous materials contained in 1 Unit:

Table	Material Name		Threshold Value	Present above threshold level		IF YES Material Mass		IF YES Information on where it is used
				Yes/No	Mass	Unit		
TABLE A Materials listed in appendix 1 of the Convention	Asbestos	Asbestos	0.1%*					
	Polychlorinated biphenyls (PCBs)	Polychlorinated Biphenyls (PCBs)	50mg/kg**					
	Ozone depleting substances	Chlorofluorocarbons (CFCs)	No threshold level					
		Halons						
		Other fully Halogenated CFCs						
		Carbon Tetrachloride						
		1,1,1-Trichloroethane						
		Hydrochlorofluorocarbons						
		Hydrobromofluorocarbons						
	Methyl Bromide							
	Bromochloromethane							
	Anti-fouling systems containing organotin compounds as a biocide		2,500 mg total tin/kg					

Table	Material Name		Threshold Value	Present above threshold value		IF YES Material Mass		IF YES Information on where it is used
				Yes / No	Mass	Unit		
TABLE B Materials listed in appendix 2 of the Convention	Cadmium & Cadmium Compounds		100 mg/kg					
	Hexavalent Chromium and Hexavalent Chromium Compounds		1,000 mg/kg					
	Lead and Lead Compounds		1,000 mg/kg					
	Mercury and Mercury Compounds		1,000 mg/kg					
	Polybromated Biphenyl (PBBs)		50 mg/kg					
	Polybrominated Diphenyl Ethers (PBDEs)		1,000 mg/kg					
	Polychloronapthalenes (Cl>=3)		50 mg/kg					
	Radioactive substances		No threshold value					
	Certain Shortchain Chlorinated Paraffins		1%					

<Supplier (respondent) information>

Company name	
Division name	
Address	
Contact person	
Telephone No.	
Fax No.	
E-mail address	
SDoC ID No.	SD-MMYYYY-AbriSuppl.-ongoingNo.

* 0.1% in principle, if 1% is applied, it should be recorded in Remarks section

** 50 mg/kg is to be used as threshold for reporting existing PCB only. NOTE: All new materials are to be free of any PCBs!

*** Additional material to be listed acc. to Annex 1 and Annex 2 of the EU Ship Recycling Regulation No. 1257/2013

The object of declaration described above is in conformity with the IMO Guidelines for the development of Inventory of Hazardous Materials Resolutions MEPC.269(68) (and, for EU-Ships: EMSA's Best Practice Guidance on the Inventory of Hazardous Materials)

Important Notice: The content and specifications of this form may not be changed or amended. Any changes or amendments by others than the author of this form constitute a breach of copyright law.

(Date DD/MM/YYYY)

(Signature and Company Stamp)

IMPORTANT NOTICE: Any significant change in material content may render this declaration invalid

Choose a unique numbering system for MDs

A group of products can be covered by one MD (e.g. O-Rings of different dimensions and not containing HazMats)

Associated SDoC-ID no. is essential to include

Choose a logical unit for the delivered product (for example: piece, kg, m, m², m³, etc.), both must agree

In case the hazardous material is not contained in a supplied product, or below the specific threshold level, a "No" entry is made and no further details are required in the respective line(s). In case a listed hazardous material is contained (above the given threshold level - if any - otherwise any concentration is to be declared) a "Yes" entry is required and further details are to be provided under the columns "quantity", "unit", and where it is included

Signature and date are essential to include

4 Dialogue and Reporting

MDs and SDoCs should be reviewed by the shipowner or its representative in the context of the ship specific IHM once they have been received. Where the forms are not fully compliant, the shipowner should provide the supplier with the reasons for their rejection in the spirit of a collaboration to achieve effective compliance with the IHM requirements. Collaboration between shipowners and suppliers in the development and maintenance of IHM Part I is fundamental to facilitating safe and environmentally sound ship recycling, and the wider effort to reduce the environmental impact of shipping.

Additional guidance on common mistakes in MD and SDOC are provided in Schedule D of this document.

Schedule A – Appendix 1 from the 2015 Guidelines for the Development of Inventories of Hazardous Materials

(Table A)

APPENDIX 1

ITEMS TO BE LISTED IN THE INVENTORY OF HAZARDOUS MATERIALS

Table A – Materials listed in appendix 1 of the Annex to the Convention

No.	Materials		Inventory			Threshold value
			Part I	Part II	Part III	
A-1	Asbestos		x			0.1% ⁴
A-2	Polychlorinated biphenyls (PCBs)		x			50 mg/kg ⁵
A-3	Ozone depleting substances	CFCs	x			no threshold value ⁶
		Halons	x			
		Other fully halogenated CFCs	x			
		Carbon tetrachloride	x			
		1,1,1-Trichloroethane (Methyl chloroform)	x			
		Hydrochlorofluorocarbons	x			
		Hydrobromofluorocarbons	x			
		Methyl bromide	x			
A-4	Anti-fouling systems containing organotin compounds as a biocide	Bromochloromethane	x			2,500 mg total tin/kg ⁷

⁴ In accordance with regulation 4 of the Convention, for all ships, new installation of materials which contain asbestos shall be prohibited. According to the UN recommendation "Globally Harmonized System of Classification and Labelling of Chemicals (GHS)" adopted by the United Nations Economic and Social Council's Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals (UNSCGHS), the UN's Sub-Committee of Experts, in 2002 (published in 2003), carcinogenic mixtures classified as Category 1A (including asbestos mixtures) under the GHS are required to be labelled as carcinogenic if the ratio is more than 0.1%. However, if 1% is applied, this threshold value should be recorded in the Inventory and, if available, the Material Declaration and can be applied not later than five years after the entry into force of the Convention. The threshold value of 0.1% need not be retroactively applied to those Inventories and Material Declarations.

⁵ In accordance with regulation 4 of the Convention, for all ships, new installation of materials which contain PCBs shall be prohibited. The Organization set 50 mg/kg as the threshold value referring to the concentration level at which wastes, substances and articles containing, consisting of or contaminated with PCB are characterized as hazardous under the Basel Convention.

⁶ "No threshold value" is in accordance with the Montreal Protocol for reporting ODS. Unintentional trace contaminants should not be listed in the Material Declarations and in the Inventory.

⁷ This threshold value is based on the *Guidelines for brief sampling of anti-fouling systems on ships* (resolution MEPC.104(49)).

(Table B)

Table B – Materials listed in appendix 2 of the Annex to the Convention

No.	Materials	Inventory			Threshold value
		Part I	Part II	Part III	
B-1	Cadmium and cadmium compounds	x			100 mg/kg ⁸
B-2	Hexavalent chromium and hexavalent chromium compounds	x			1,000 mg/kg ⁸
B-3	Lead and lead compounds	x			1,000 mg/kg ⁸
B-4	Mercury and mercury compounds	x			1,000 mg/kg ⁸
B-5	Polybrominated biphenyl (PBBs)	x			50 mg/kg ⁹
B-6	Polybrominated diphenyl ethers (PBDEs)	x			1,000 mg/kg ⁸
B-7	Polychlorinated naphthalenes (more than 3 chlorine atoms)	x			50mg/kg ¹⁰
B-8	Radioactive substances	x			no threshold value ¹¹
B-9	Certain shortchain chlorinated paraffins (Alkanes, C10-C13, chloro)	x			1% ¹²

⁸ The Organization set this as the threshold value referring to the Restriction of Hazardous Substances (RoHS Directive 2011/65/EU, Annex II).

⁹ The Organization set 50 mg/kg as the threshold value referring to the concentration level at which wastes, substances and articles containing, consisting of or contaminated with PBB are characterized as hazardous under the Basel Convention.

¹⁰ The Organization set 50 mg/kg as the threshold value referring to the concentration level at which wastes, substances and articles containing, consisting of or contaminated with PCN are characterized as hazardous under the Basel Convention.

¹¹ All radioactive sources should be included in the Material Declaration and in the Inventory. *Radioactive source* means radioactive material permanently sealed in a capsule or closely bonded and in a solid form that is used as a source of radiation. This includes consumer products and industrial gauges with radioactive materials. Examples are listed in appendix 10 of Res.MEPC.269(68).

¹² The Organization set 1% as the threshold value referring to the EU legislation that restricts Chlorinated Paraffins from being placed on the market for use as substances or as constituents of other substances or preparations in concentrations higher than 1% (EU Regulation 1907/2006, Annex XVII Entry 42 and Regulation 519/2012).

(Table C)

TABLE C Potentially hazardous items

No.	Properties		Goods	Inventory		
				Part I	Part II	Part III
C-1	Liquid	Oiliness	Kerosene			x
C-2			White spirit			x
C-3			Lubricating oil			x
C-4			Hydraulic oil			x
C-5			Anti-seize compounds			x
C-6			Fuel additive			x
C-7			Engine coolant additives			x
C-8			Antifreeze fluids			x
C-9			Boiler and feed water treatment and test re-agents			x
C-10			De-ioniser regenerating chemicals			x
C-11			Evaporator dosing and descaling acids			x
C-12			Paint stabilizers/rust stabilizers			x
C-13			Solvents/thinners			x
C-14			Paints			x
C-15			Chemical refrigerants			x
C-16			Battery electrolyte			x
C-17			Alcohol, methylated spirits			x
C-18	Gas	Explosives/ inflammables	Acetylene			x
C-19			Propane			x
C-20			Butane			x
C-21			Oxygen			x
C-22		Green House Gases	CO ₂			x
C-23			Perfluorocarbons (PFCs)			x
C-24			Methane			x
C-25			Hydrofluorocarbon (HFCs)			x
C-27			Nitrous oxide (N ₂ O)			x
C-28			Sulfur hexafluoride (SF ₆)			x
C-29	Liquid	Oiliness	Bunkers: fuel oil			x
C-30			Grease			x
C-31			Waste oil (sludge)		x	
C-32			Bilge and/or waste water generated by the after-treatment systems fitted on machineries		x	
C-33			Oily liquid cargo tank residues		x	
C-34			Ballast water		x	
C-35			Raw sewage		x	
C-36			Treated sewage		x	
C-37			Non-oily liquid cargo residues		x	
C-38	Gas	Explosibility/ inflammability	Fuel gas			x

(Table C continued)

TABLE C. Potentially hazardous items

No.	Properties	Goods	Inventory		
			Part I	Part II	Part III
C-39	Solid	Dry cargo residues		x	
C-40		Medical waste/infectious waste		x	
C-41		Incinerator ash ²⁾		x	
C-42		Garbage ²⁾		x	
C-43		Fuel tank residues		x	
C-45		Oily solid cargo tank residues		x	
C-45		Oily or chemical contaminated rags		x	
C-46		Batteries (incl. lead acid batteries)			x
C-47		Pesticides/insecticide sprays			x
C-48		Extinguishers			x
C-49		Chemical cleaner (incl. electrical equipment cleaner, carbon remover)			x
C-50		Detergent/bleacher (could be a liquid)			x
C-51		Miscellaneous medicines			x
C-52		Fire fighting clothing and Personal protective equipment			x
C-53		Dry tank residues		x	
C-54		Cargo residues		x	
C-55		Spare parts which contain materials listed in Table A or Table B			x

2) Definition of garbage is identical to that in MARPOL Annex V. However, incinerator ash is classified separately because it may include hazardous substances or heavy metals.

(Table D)

Table D – Regular consumable goods potentially containing hazardous materials¹⁴

No.	Properties	Example	Inventory		
			Part I	Part II	Part III
D-1	Electrical and electronic equipment	Computers, refrigerators, printers, scanners, television sets, radio sets, video cameras, video recorders, telephones, consumer batteries, fluorescent lamps, filament bulbs, lamps			x
D-2	Lighting equipment	Fluorescent lamps, filament bulbs, lamps			x
D-3	Non ship-specific furniture, interior and similar equipment	Chairs, sofas, tables, beds, curtains, carpets, garbage bins, bed-linen, pillows, towels, mattresses, storage racks, decoration, bathroom installations, toys, not structurally relevant or integrated artwork			x

¹³ Definition of garbage is identical to that in MARPOL Annex V. However, incinerator ash is classified separately because it may include hazardous substances or heavy metals.

¹⁴ This table does not include ship-specific equipment integral to ship operations, which has to be listed in part I of the inventory.

Schedule B – Model Form of SDoC

SUPPLIER'S DECLARATION OF CONFORMITY

for Material Declaration Management

(according to IMO Resolution MEPC.269(68) and EU Ship Recycling Regulation)

1) SDoC ID No.:

2) Issuer's name:

Issuer's address:

3) Scope of SDoC

	Valid for this order and listed product(s) only
	Valid for repeated order of listed product(s) only
X	Valid for all orders and customers (typical choice)

Object(s) of the declaration:

1)

2)

3)

4)

5)

6)

7)

8)

9)

10)

4) The object of declaration described above is in conformity with the requirement of the following documents:

5)

Document No.	Title	Edition	Date of
MEPC. Res 269(68)	Guidelines for the Development of Inventory of Hazardous Materials	2015	15.05.2015
SRCONF 45	International Hong Kong Convention for the Safe and Environmentally Sound Recycling of Ships	2009	19.05.2009
ISO 30005	Ships and marine technology — Ship recycling management systems — Information control for hazardous materials in the manufacturing chain of shipbuilding and ship operations	2012	01.05.2012
REGULATION (EU) No 1257/2013	Regulation of the European Parliament and of the Council of 20 November 2013 on ship recycling and amending Regulation (EC) No 1013/2006 and Directive 2009/16/EC	2013	20.11.2013
related to: REGULATION (EU) No 1257/2013	EMSA's Best Practice Guidance on the Inventory of Hazardous Materials	2016	28.10.2016

6) Additional Information:

Signed for and on behalf of:

(Place of issue)

(Date of issue)

7)

(Name, function)

(Signature)

Schedule C – Model Form of MD

MATERIAL DECLARATION

Type 1: Self Declaration

<Date of declaration>

Date:

<MD ID Number>

MD-ID-No.

<Other information (e.g. client, shipbuilder, hull no. if applicable)>

Remarks

<Supplier (respondent) information>

Company name	
Division name	
Address	
Contact person	
Telephone No.	
Fax No.	
E-mail address	
SDoC ID No.	SD-MMYYYY-AbbrSuppl.-ongoingNo.

<Product information>

Product Name	Product Number	Delivered Unit		Product Information
		Amount	Unit	

<Material information>

Unit

This material information shows the amount of hazardous materials contained in 1 Unit:

1

Table	Material Name		Threshold Value	Present above threshold level	IF YES Material Mass		IF YES Information on where it is used
				Yes/No	Mass	Unit	
TABLE A Materials listed in appendix 1 of the Convention	Asbestos	Asbestos	0.1%*				
	Polychlorinated biphenyls (PCBs)	Polychlorinated Biphenyls (PCBs)	50mg/kg**				
	Ozone depleting substances	Chlorofluorocarbons (CFCs)	No threshold level				
		Halons					
		Other fully Halogenated CFCs					
		Carbon Tetrachloride					
		1,1,1-Trichloroethane					
		Hydrochlorofluorocarbons					
		Hydrobromofluorocarbons					
		Methyl Bromide					
		Bromochloromethane					
	Anti-fouling systems containing organotin compounds as a biocide		2,500 mg total tin/kg				

Table	Material Name		Threshold Value	Present above threshold value	IF YES Material Mass		IF YES Information on where it is used
				Yes / No	Mass	Unit	
TABLE B Materials listed in appendix 2 of the Convention	Cadmium & Cadmium Compounds		100 mg/kg				
	Hexavalent Chromium and Hexavalent Chromium Compounds		1,000 mg/kg				
	Lead and Lead Compounds		1,000 mg/kg				
	Mercury and Mercury Compounds		1,000 mg/kg				
	Polybromated Biphenyl (PBBs)		50 mg/kg				
	Polybrominated Diphenyl Ethers (PBDEs)		1,000 mg/kg				
	Polychloronapthalenes (Cl>=3)		50 mg/kg				
	Radioactive substances		No threshold value				
	Certain Shortchain Chlorinated Paraffins		1%				

* 0.1% in principle, if 1% is applied, it should be recorded in Remarks section

** 50 mg/kg is to be used as threshold for reporting existing PCB only. NOTE: All new materials are to be free of any PCBs!

*** Additional material to be listed acc. to Annex 1 and Annex 2 of the EU Ship Recycling Regulation No. 1257/2013

The object of declaration described above is in conformity with the IMO Guidelines for the development of Inventory of Hazardous Materials Resolutions MEPC.269(68) (and, for EU-Ships: EMSA's Best Practice Guidance on the Inventory of Hazardous Materials)

Important Notice: The content and specifications of this form may not be changed or amended. Any changes or amendments by others than the author of this form constitute a breach of copyright law.

(Date DD/MM/YYYY)

(Signature and Company Stamp)

IMPORTANT NOTICE: Any significant change in material content may render this declaration invalid

Schedule D – Common mistakes

Introduction

This section provides examples of common mistakes in MDs and SDoCs and guidance how to resolve them. An understanding of these issues will ease the preparation of the documents by suppliers and help reduce the workload for all involved.

MD Requests for equipment and stores delivered to the ship, far in excess of what is required under the EUSRR or HKC regimes can overwhelm suppliers, with varying consequences, all of which are detrimental to, and/or inconsistent with, the shipowners' obligations in relation to the maintenance of IHM:

- i. suppliers refuse to supply certain ships/shipowners altogether;
- ii. suppliers refuse or fail to provide any MDs at all, whether for items that require them or those that do not;
- iii. suppliers comply with unnecessary requests or spend time rejecting them, at significant cost of manpower, and such costs are passed on to shipowners in increased prices or surcharges;
- iv. some unscrupulous suppliers simply issue MDs without any care or regard for their accuracy, rendering their content inaccurate and worthless;

Similarly, the inaccuracy of the MD and SDoC forms completion from the suppliers may include:

- i. sending MD and the SDoC without being correctly completed, indicating insufficient knowledge of the forms completion instructions;
- ii. sending the MDs instead of the SDoC and vice versa;
- iii. sending MSDS or other technical specification forms instead of MD and SDoC;
- iv. filling in the MD form without having concrete data of the supplied items composition.

None of these outcomes benefit IHM-compliance for the supplier, shipowner, crew or, at the end of the ship's life, the ship recycler who has to incorporate the IHM-information into the recycling planning. As such excessive requests create significant disadvantages for the entire industry and do nothing to further the objective of safer recycling.

Common Mistakes and How to Solve Them

1 SDoC

1 SDoC ID no. is missing.

- ➔ Insert a SDoC ID no. (guidance provided above). One SDoC for a supplier company is advisable and all product specific MDs can then reference this SDoC-ID number.

2 Missing information concerning relevant legislations, standards and norms

- ➔ Insert legal and organisational references as applicable. This clarifies the legal background and avoids mis-understandings. As such, it safeguards suppliers and shipowners alike from conflicts as the background is clearly defined.

At least the following is to be listed:

- Hong Kong Convention
- EU SRR

The following are optional:

MEPC. Res 269(68)

EMSA's Best Practice Guidance on the Inventory of Hazardous Materials

ISO 30005

RoHS

REACH

3 Missing / wrong contact details and signature

- ➔ The SDoC must contain suppliers' contact details and be signed by a representative of the company.

4 Provision of TIER – two documents

As the SDoC is a legal document and is to be requested from / provided by Tier 1 supplier, it is necessary that the Tier 1 supplier provides the documents in its own company name.

2 MD**1 MD ID no. is missing**

- ➔ Insert a unique ID for your MD, as described above. It is advisable to use a structured numbering system, for easy archiving and reuse for future requests.

2 Reference to SDoC ID No. is missing

- ➔ Insert the correct SDoC ID No. (from SDoC). MDs have to show the SDoC-ID number they are related to, otherwise, the combination of the two documents is not legally valid and will not be accepted by customers.

By issuing one “Master SDoC”, the same SDoC ID No. can be used for as many MDs as supplier wants.

3 Amount and / or unit is missing

- ➔ Insert quantity / unit of the declared item, both selections should be identical for ensuring consistency in the details provided. For avoiding order-specific MDs clarify with your customer if he accepts a standard value for quantities delivered.

4 Product name not identical with PO

- ➔ Ensure that the right item name is referenced, so the documents can be related easily to the respective order item and documentation request. Alternatively, the product number should be identical at least.

5 Unnecessary Yes-entries

- ➔ Before making a Yes-entry, check if the item / material falls under any exception as provided (e.g. metal and metal alloys are excluded and not relevant for suppliers documentation). Otherwise, unnecessary entries and follow-up activities onboard are generated during IHM Maintenance for the shipowner / customer.

6 Wrong Quantities

- ➔ If a hazardous material is contained above its specific threshold level, a Yes-entry is required. The threshold relates to the entire homogenous material containing it and therefore the mass and unit of the entire homogeneous material is to be specified. DO NOT insert the mass of the pure HazMat contained in an unspecified mass of a homogenous material which contains it.

7 Missing / wrong contact details and signature

- ➔ The MD must contain suppliers' contact details (and depending on the form be signed).

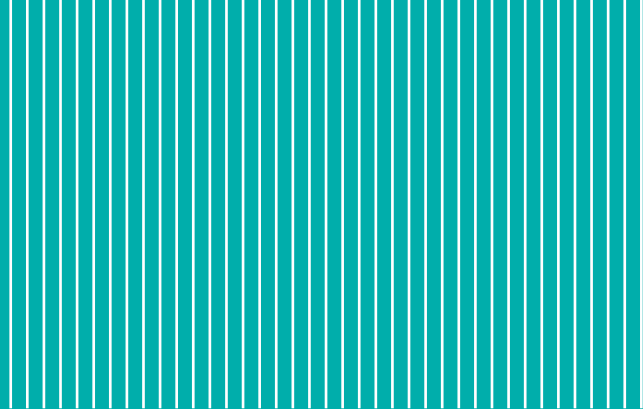
8 Provision of TIER – two documents

- ➔ As the MD is a legal document and was requested from the supplier, it is incumbent on the supplier to provide the documents in their company's name. It is not acceptable that suppliers provide Tier 2 (their supplier) documents. The contract exists between supplier and customer and this needs to be considered in the documents as well. As such a supplier (Tier 1) has to create own documents based on data from its supply chain.



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Shaping the Future of Shipping



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