

Isle of Man Ship Registry Technical Advisory Notice

Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships	Ref: 008-23 Issued: 19 th Sep 2023
---	--

1. Introduction

Following ratification by Bangladesh and Liberia, the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships (HKC) has now reached the tonnage criteria outlined in the Convention and will enter into force on 26 June 2025.

The Convention aims to ensure that ships that have entered the end of their operational life are recycled in a manner that does not pose any unnecessary risk to human health and safety or the environment.

2. Application & Key Requirements

The Convention will apply to all ships greater than 500gt and Ship Recycling Facilities operating under the jurisdiction of a party. Ship Recycling Facilities are outside the scope of this notice and this TAN focuses on the requirements pertinent for operation of Manx flagged vessels only. Where an operator wishes to recycle a vessel, they should consult the requirements of the authority under which the Recycling Facility operates.

The Convention will not apply to any warships, naval auxiliary, or other ships owned or operated by a Party and used only on government non-commercial service. It should be noted however, that the definition of the term 'ship' within the Convention is broad and includes floating platforms, FPSU's, non-self-propelled vessels, private yachts and other vessels that generally fall outside the scope of other Conventions.

All vessels falling within scope of the Convention must maintain on board an Inventory of Hazardous Materials (IHM) and a Statement of Compliance issued by the vessels Recognised Organisation (RO) following verification of the IHM.

It should be noted that the EU [Ship Recycling Regulation](#) (SRR) was an early implementation of the HKC, operators complying with SRR (holding a verified IHM), comply with the HKC.

3. Inventory of Hazardous Materials

The Inventory of Hazardous Materials is a ship-specific document. It consists of three parts (I – III) although Part II and III are only required when the decision is made to recycle the vessel. The IHM should be developed using the guidelines contained within MEPC.379(80). Where outside expertise is used to develop the IHM this should be a different entity to the RO verifying the IHM.

4. Hong Kong Recycling and the Basel Convention

When the decision has been made to recycle a ship, it should be noted that there is the possibility of two different regulatory regimes being applied, the HK Convention and the Basel



Convention. The applicable Convention will be dependent upon the type of ship and the regulatory regime of the country where the decision is made to recycle the ship and the country where the ship is to be recycled.

When an operator makes the decision to recycle a vessel expert advice should be sought in both the export and import country to ensure that the recycling process is compliant with both the HK Convention and the Basel Convention (where applicable).

Please note - The Isle of Man Ship Registry cannot give legal advice. Where this document provides guidance on the law it should not be regarded as definitive. The way the law applies to any particular case can vary according to circumstances - for example, from vessel to vessel. You should consider seeking independent legal advice if you are unsure of your own legal position.

