

IHM Renewal: Readiness Requirements Through Robust IHM Maintenance

Newsletter as on 19 August 2024

upon a five yearly basis from the date of issuance of the **IHM Certificate or Statement of Compliance (SoC)**, an **IHM Renewal survey must be conducted by a Recognized Organization or Administration to safeguard adherence to the regulation**. It is estimated that the same volume of vessels with IHM Part I developed during 2019/2020 will require renewal surveys in 2024/2025.

Additionally, lately, several certification bodies have also reported seeing more and more IHM Renewal surveys due together with other statutory renewal certification as a part of a harmonization requirement, along with increased number of support cases with questions about IHM Renewal surveys and IHM Maintenance requirements.

KEY INSIGHTS ON IHM MAINTENANCE PROCEDURES & REQUIREMENTS + PSC INSPECTIONS:

One can assuredly state that to complete a successful IHM Renewal, comprehensive and thorough IHM Maintenance is epitome. Therefore, **it is imperative to understand what needs to be done to properly maintain the Inventory and to ensure smooth IHM Renewal Surveys as well as ongoing Port State Control (PSC) inspections**.

It is also noteworthy to state that in accordance with the Hong Kong Convention (HKC) and EU SRR regulation, the PSC follow very clear-cut and 'black and white' inspection checklists to verify IHM vigilance and implementation onboard vessels. **Consequently, as per PSC inspections, vessels found not holding an IHM Certificate/SoC or found with an expired IHM Certificate/SoC and/or in non-compliance with the control measures of HazMat in the related Appendices/Annexes are subject to detainable deficiencies. Additionally, no implementation of an IHM Maintenance programme will be reported to the administration for redressal at the next call/survey**. Accordingly, a detailed inspection may be carried out in accordance with relevant IMO/EU guidelines.

The following are key requirements for necessary IHM Maintenance implementation:

Establishing a IHM Maintenance Procedure/Manual & Appointing an IHM Designated Person(s): Shipowners must establish an IHM Maintenance procedure/manual, which is integrated into the shipowner's safety management system and appoint a person responsible for IHM Maintenance, typically named an IHM Designated Person(s) (IHM DP).

Defining a suitable review period for all vessel purchases: Based on the IHM Maintenance procedure, the IHM DP shall review all purchases made for each vessel within an acceptable period (e.g. bi-monthly or quarterly) as should be defined by the ship owner in the IHM maintenance procedure.

Consistent Collection of MD & SDoC forms for ALL Purchased Products: For purchased products, which fall into the scope of IHM Part I, Material Declaration (MD) and Supplier Declaration of Conformity (SDoC) forms must be consistently collected from the suppliers for ALL purchased products. Even if there are no hazardous materials in a product, MD/ SDoC forms must still be collected as they are the shipowner's evidence that the product is free of hazardous materials.

Maintaining a Change Log & continual update to IHM Part I of any Declared Hazardous Material with issuance of new revisions, including revision dates and revision numbers: If a hazardous material is declared above the specified threshold values in a product, the IHM DP shall update the Inventory and issue a new revision with date and revision number. The IHM DP should record the conducted activities in a change log.

Maintaining a consistently updated IHM Part I, supplemented by MDs & SDoCs: As the Recognized

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Document ID: News20240819-02

Organization conducting the IHM Renewal survey will examine the previous version of the IHM Part I and compare it with the updated IHM Part I, supplemented by the new MD and SDoC, all versions must be maintained on board. If an item of equipment that contains a hazardous material is removed from the vessel, it too must be removed from the IHM Part I as well. It should be noted that when the term “on board” is used, this means that having digital solutions in place is also acceptable.

Partnering with a third party IHM Maintenance service provider: To optimally manage IHM Maintenance, which is centralized, fully digitalized and diligently kept up to date, ship owners/managers can employ the services of a trusted third-party service provider, who will handle the end-to-end administrative requirements of IHM Maintenance at a vessel or fleet level.

KEY INSIGHTS ON IHM RENEWAL SURVEYS:

The following are key requirements for IHM Renewal surveys (applicable every 5 years from the date of the initial IHM survey):

- Ship’s existing IHM Certificate/SoC.
- The updated IHM (Part I), reflecting any change, replacement or significant repair of structure, equipment, systems, fittings, arrangements and materials since the last survey.
- Implementation of IHM Maintenance system onboard.
- Ship’s IHM Part I maintenance record, MDs and SDoCs reflecting the ship’s hazardous materials management since last IHM survey.

During the IHM Renewal survey, typically the Recognized Organization or Administration will verify that:

- A vessel-specific, maintained and updated IHM Part I is provided on board together with a valid compliance declaration.
- The procedure for maintaining the IHM Part I is on board and integrated into the safety management system.
- The IHM Part I is consistent with the arrangement, structure and equipment of the vessel.

To conclude, without deterrence or delay, ship owners/managers must establish and/or sustain strong IHM Maintenance procedures in proper readiness for IHM Renewal and to avoid any findings of non-compliance.

CTI-Maritec IHM Maintenance Services & Solutions:

Unmatched Experience: Being a leading IHM Part I service provider for 13+ years, we provide a holistic solution to deliver gold-standard IHM & IHM Maintenance services for over 5000 vessels, globally.

Speedy Support from Dedicated Personnel: All our IHM Maintenance clients receive personalized support from dedicated executives that comprehensively maintain all aspects in robust adherence with regulatory requirements.

Digitalised Systems & Platforms: Our IHM Maintenance services & solutions are managed digitally to ensure the utmost ease of access and accuracy of records.

For more information on IHM Maintenance and IHM survey services & solutions, please visit https://www.maritec.com.sg/services/IHM_Recycling or please write to us at admin@maritec.com.sg.

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