Ship Recycling

Summary of IHM Services

by Classification Societies

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1. Introduction

EU Regulation 1257/2013 on Ship Recycling is aimed at facilitating early ratification of the IMO Hong Kong Convention (hereinafter referred to as HKC) on Ship Recycling, both within the European Union and in third countries, by applying proportionate controls to ships and ship recycling facilities on the basis of that Convention. The EU Regulation has implications for the superyacht sector since it requires yachts to record their Inventory of Hazardous Materials (IHM) which includes not only those that were present at the time of the build but also modifications made and equipment fitted during its subsequent life. Furthermore in addition to the IMO and EU recycling legislation designers and builders need to be aware of their obligations under UN and EU waste policy.

Because of the possible early date of application to new EU flagged ships, ICOMIA called for an industry wide meeting at METS on 19 November 2014 to discuss how to address the challenges of this Regulation. It was agreed to start with a survey of organisations involved in survey and certification of the IHM and/or providing services for preparing IHMs. SYBAss then offered to investigate IHM-related services provided by Classification Societies.

A draft SYBAss report of the IHM survey has been discussed by the Industry Working Group on 15 January in Antibes. The outcomes of that meeting are included in this revision of the report.

Five Classification Societies have been contacted and the obtained information is summarized in this report. Additional information is given in the annexes to this report whilst also references to IHM related Class publications are listed.

2. IMO Hong Kong Convention on Ship Recycling

The EU Regulation 1257/2013 on Ship Recycling is to a large extent based on the IMO Hong Kong Convention (HKC) on Ship Recycling and contains various references to the HKC and related Guidelines.

For readers who are not familiar with the HKC a short summary of requirements is given in this chapter. The information is extracted from Resolution MEPC.179(62) HKC 2011 Guidelines Development Ship IHM (see section 2.6). These comprehensive IMO Guidelines and/or derived Guidelines by Classification Societies (see Annexes) should be consulted for more details. This report focusses on the mandatory Inventory of Hazardous Materials (IHM).

The objectives of the IHM are to provide ship-specific information on the actual hazardous materials present on board in order to protect health and safety of the crew, and to protect health and safety of workers at ship recycling facilities and avoid environmental pollution when the ship is going for recycling.

The IHM consists of three parts:

Part I: Materials contained in ship structure or equipment. Part I of the IHM shall be developed for new and existing ships.

Part II and Part III: Operationally generated wastes and stores. These Parts shall be developed prior to recycling of the ship. As it is unlikely that superyachts will be recycled in the here considered period, Parts II and III are not addressed in this report.
Materials that shall be listed in Part I of the IHM are divided in two categories:

**Table A**: Comprises materials listed in appendix 1 of the HKC. All Table A materials, if present on board, shall be included in the IHM.

**Table B**: Comprises materials listed in appendix 2 of the HKC. Table B materials, if present on board, shall be included in the IHM of new ships if above the threshold values. For existing ships Table B materials shall be listed as far as practicable.

### 2.1. Development of Part I of the IHM for new ships

For new ships, the shipbuilder is responsible for developing Part I of the IHM during the design and construction stage in partnership with equipment suppliers and Classification Society.

### 2.2. Development of Part I of the IHM for existing ships

For existing ships, the shipowner is responsible for developing Part I of the IHM. The shipowner may draw up expert assistance, however such expert or expert party should not be the same as the person or party authorised by the Administration to approve the IHM (often a Classification Society).

The determination of hazardous materials on board existing ships should, as far as possible, be conducted as prescribed for new ships. Alternatively the below procedures may be applied, but these procedures should not be used for any new installation resulting from the conversion of existing ships after the initial preparation of the IHM.

The following procedure should be followed:

1. Collection of necessary information;
2. Assessment of collected information;
3. Preparation of Visual/Sampling Check Plan;
4. Onboard Visual/Sampling Check; and
5. Preparation of Part I of the IHM and related documentation.

### 2.3. Maintaining and updating Part I of the IHM during operations

The HKC requires that the shipowner maintains the IHM, throughout the life of the ship.

If any machinery or equipment is added, removed or replaced or the hull coating is renewed, Part I of the IHM should be updated according to the requirements for new ships. Updating is not required if identical parts or coatings are installed or applied.

Part I of the IHM should belong to the ship and the continuity and conformity of the information should be confirmed, especially if the flag, owner or operator of the ship changes.

### 2.4. Requirements for ascertaining the conformity of the IHM

The conformity of the IHM for new ships (or new installations) should be ascertained by reference to the *Supplier's Declaration of Conformity* (SDoC) and the related *Material Declarations* (MD) collected from suppliers.
For maintaining and updating the IHM shipowners should implement the following measures in order to ensure the conformity of Part I of the IHM:

1. Designate a responsible person (ashore or on board);
2. Establish and supervise a system to ensure necessary updating of the IHM;
3. Maintain the IHM;
4. Provide related documents as required for the survey or sale of the ship.

Guidance on how to complete MD and SDOC forms is provided in Annexes 8 and 9.

2.5. IHM Survey and Certification

The HKC identifies the following surveys to be performed by the Administration or organisation recognised by the Administration (often a Classification Society):

**Initial survey**: to verify whether Part I of the IHM has been prepared in accordance with the HKC. Note that there are different requirements for the initial surveys of new ships and those for existing ships.

**Renewal survey**: to be carried out at intervals not exceeding five years.

**Additional survey**: at the request of the shipowner after change, replacement or significant repair of the structure, equipment, systems, fittings, arrangements and material, which have an impact on the IHM.

**Final survey**: conducted before a ship is taken out of service and before the recycling of the ship has started.

Note that most Classification Societies consider an annual survey essential to developing an IHM which will retain its usefulness throughout the life of the ship.

2.6. IMO Guidelines related to the IHM

The above information has been extracted from the relevant Guidelines developed by the International Maritime Organization (IMO):

- IMO Resolution MEPC.179(62) HKC 2011 Guidelines Development Ship IHM;
- IMO Resolution MEPC.222(64) HKC 2012 Guidelines Survey & Certification;
- IMO Resolution MEPC.223(64) HKC 2012 Guidelines for the Inspection of Ships;

Many details for preparing Part I of the IHM can be found in the above Guidelines for the Development of Ship’s IHM. It is expected that this guideline will be updated in 2015, mainly with regard to the hazardous materials listed in Tables A and B (e.g. threshold values).

The IMO Guidelines can be obtained from the SYBAss secretariat upon request (pdf format).
3. **EU Regulation on Ship Recycling**

3.1. **Differences between EU Regulation and HKC**

EU Regulation 1257/2013 on Ship Recycling (hereinafter referred to as EU Regulation) essentially applies ship recycling requirements to ships flagged with EU Member States, as well as certain requirements to non-EU flagged ships calling at EU ports. Each new ship shall have on board an inventory of hazardous materials, which shall identify at least the hazardous materials referred to in Annex II of the EU Regulation and contained in the structure or equipment of the ship, their location and approximate quantities (refer to Annex 7). The EU Regulation is mostly aligned with the Hong Kong Convention but some aspects differ. The requirements for an EU IHM are expected to be more onerous than for the Hong Kong Convention’s Inventory.

At present the size threshold for compliance with the Regulation is 500 GT but there are concerns this may be reduced later.

Detailed guidance on this regulation is being developed for the European Commission by EMSA and is expected to be published in the middle of 2015 (refer also to section 5.2). Further guidance will be produced by the associations once received and evaluated.

Note that according to existing regulatory instruments (e.g. SOLAS and MARPOL) a number of hazardous materials is prohibited and/or restricted for installation or use on newbuildings, as well as for replacement or repair – refer to Annex 6.

3.2. **Application dates of the EU Regulation**

- Application dates of the EU Regulation are as follows: EU-flagged newbuildings are required to have onboard a verified IHM with a Statement of Compliance not later than 6 months after the date that the combined maximum annual ship recycling output of the ship recycling facilities included in the European List constitutes not less than 2.5 million light displacement tonnes, but not before 31 December 2015 and not later than 31 December, 2018.

- Existing EU-flagged vessels are required to have onboard a verified IHM with a Statement of Compliance at the latest by 31 December 2020 (or if the ship is to be recycled, the IHM should be on board from the date when the EU list of ship recycling facilities is published).

- Non-EU-flagged vessels calling at EU ports are also required to have onboard a verified IHM with a Statement of Compliance at the earliest by 31 December 2020.

For new ships the EU Regulation applies when:

a. the building contract is placed on or after the date of application of this Regulation;

b. in the absence of a building contract, the keel is laid or the ship is at a similar stage of construction six months after the date of application of this Regulation or thereafter; or

c. the delivery takes place thirty months after the date of application of this Regulation or thereafter;

d. applies to both commercial and private yachts.
Note that for superyachts condition c may apply given the often long time lapse between date of contract and delivery.

The timeline of application dates of the EU Regulation is depicted in the figure below.

4. **Summary of IHM services by Classification Societies**

4.1. **Classification Societies that have been consulted**

The IHM-related services offered by Classification Societies are largely based on the related IMO Guidelines. The following Classification Societies have been consulted:

- American Bureau of Shipping (ABS)
- Nippon Kaiji Kyokai (ClassNK)
- Det Norske Veritas – Germanischer Lloyd (DNV-GL)
- Lloyds Register of Shipping (LR)
- Registro Italiano Navale (RINA)

The IHM services offered by these Classification Societies are discussed in the following sections. For additional information refer to the Annexes 1 to 5. Although SYBAss has taken care in the collection of these data, the information may be incomplete.

The documents mentioned in Annexes 1 to 5 can be obtained from the SYBAss secretariat upon request (pdf format). However, preferably the referred documents, or any additional information, should be obtained through the classification society’s contact mentioned at the end of each Annex.

4.2. **IHM Services provided**

Note that the summary of services below is based on information received to date by SYBAss from Classification Societies or derived from their website in case no reply was received upon a request for information.
All five Classification Societies provide IHM services. Some years ago such services were often connected to a Green Passport class notation. Since the adoption of the Hong Kong Convention Classification Societies will issue an IHM Statement of Compliance instead of a Green Passport class notation on completion of the ship’s IHM verification. This IHM Statement of Compliance will be converted into an International Certificate on Inventory of Hazardous Materials after the entry into force of the EU Regulation or Hong Kong Convention. Note that some of the documents referred to in the Annexes are still using Green Passport terminology.

At this time it is assumed that Classification Societies will apply the HKC approach with regard to EU Regulation 1257/2013 on Ship Recycling. However this needs to be verified once the EU guidance on this matter is published (expected later this year).

All five Classification Societies perform IHM survey and certification activities and provide necessary guidance to shipyards and shipowners, including templates for the Supplier’s Declaration of Conformity (SDoC) and the related Material Declarations (MD).

Some Classification Societies provide expert IHM assistance through a separate consulting subsidiary, for instance for the preparation of Visual/Sampling Check Plan and onboard check.

Some Classification Societies provide computer based systems for compiling IHMs, ranging from interactive dynamic pdf forms (LR) to web-based systems (ClassNK and DNV-GL).

Note that IHM services need not necessarily be obtained from the same Classification Society under which the ship is built, although this can be advantageous from efficiency point of view.

5. General IHM observations

In this chapter some IHM points of attention are listed as well as a few comments from external parties.

5.1. Some IHM Attention points

In this section a number of attention points is listed as obtained from the information received, as well as views expressed in “SYBAss and the Ship Recycling Convention”, P.C. Kuiper et al, SWZ|Maritime 2011.

For the development of the IHM for new ships, shipbuilders and suppliers have to exchange and store a huge number of paper documents. This may be a serious burden for shipbuilders and suppliers. SYBAss believes that the interactive and web-based systems offered by several Classification Societies can be very useful tools for handling all “building blocks” when composing IHMs.

For the development of the IHM for existing ships, expert assistance seems to be indispensable. However note that an expert party should not be the same as the party authorised by the Administration to approve the IHM.

It seems currently very difficult to identify all the materials used in the thousands of parts in all the systems of a ship. It also appears virtually impossible to obtain a complete list of all material declarations from suppliers of systems and parts of a ship. In an earlier study was found that no more than 80% of the material deliveries were accompanied by a material declaration. This will be a real risk during the early application stages of the EU and HKC ship
recycling regulations, when not all Tier 1 and Tier 2 suppliers will have their MD systems fully developed. At this time it is unknown how Administrations will deal with such inevitably incomplete IHMs. Refer to Annex 3.5 for DNV-GL’s and to Annex 4.10 for LR’s comments on this matter.

To enforce the delivery of Material Declarations, builder’s and operator’s purchase departments are strongly advised to include related clauses in the contracts with suppliers of equipment, systems and installations.

With the entry into force of the EU ship recycling regulations at relative short notice, Classification Societies expect an increasing workload for their IHM Services. Builders and owners are therefore advised to start preparing IHMs at an early stage, especially when they do this for the first time and have to develop and test their related procedures and systems.

It seems likely that shipowners, being aware that the EU and HKC ship recycling regulations shall in due course also apply for existing ships, will ask builders to deliver IHMs with new ships in anticipation of the entry into force of the EU and HKC ship recycling regulations. Also builders may consider the inclusion of an IHM in their scope of delivery as a selling point.

It therefore seems wise for shipbuilders, even without an immediate necessity to do so, to start an IHM pilot project for one of their newbuilds in order to get their IHM procedures and systems in place, thus ensuring a smooth IHM preparation and certification process for the time to come.

5.2. EMSA comments on the draft of this report

As advised by the IHM Industry Workgroup on 15 January, SYBAss has through its IMO contact received comments on the draft of this IHM report from the European Maritime Safety Agency (EMSA).

EMSA is one of the EU’s decentralized agencies and provides technical assistance and support to the European Commission and Member States in the development and implementation of EU legislation on maritime safety, pollution by ships and maritime security. EMSA also provides services related to port state control to EU member states.

Based on a quick reading of the draft of this IHM report the EMSA’s representative made the following comments:

The report is generally correct and offers a good overview of the services offered by class societies in this field.

There are however a number of issues (which are not reflected):

- IHMs according to the HKC might not meet all the requirements of the EU Regulation. For a start, there are couple of substances not contemplated under HKC but under the EU Ship Recycling Regulation (PFOs, brominated flame retardants);
- Class Societies are issuing Statement of Compliances. Yet the EU Ship Recycling Regulation requires the flags to issue Hazardous Materials Certificates...This is an issue since the HKC has not entered into force (a solution for this is underway);
- Class Societies are offering these services but there are no requirements for HazMat Experts (the Commission will issue guidance on this);
Testing laboratories or sampling companies would need to abide to some rules (not defined under HKC or the related guidelines). Again the European Commission plans to issue guidance on this (lab requirements, minimum number of samples, etc).

As you can see above, there are a number of issues that need to be sorted out under the EU Ship Recycling Regulation. Also, time is running. By 2020 all ships should be ready in terms of documents/IHMs. Given that there are around 85,000 ships around the world (many calling at the EU), it may mean roughly 10,000 IHMs to be developed per year until 2020... Port State Control enforcement will start earlier in the EU...

5.3. First time IHM experience of a SYBAss member

As advised by the IHM Industry Workgroup on 15 January, SYBAss has contacted a SYBAss member that recently completed an IHM for one of their newbuildings. Their experiences are listed below, but note that these are rather recent. The SYBAss member has informed me that these will be discussed with Lloyds Register of Shipping (LR) shortly and any unclear issues may have been solved by now.

Early this year we have submitted our first IHM forms to LR. Our experiences when preparing the forms are following:

- Most suppliers have used the standard SDoC and MD forms. However some suppliers have developed their own system. At this time LR accepts both type of forms;
- The MD form is clear. However in many cases the purpose of the SDoC is unclear;
- After receipt of all forms the “LR pdf” has to be completed (refer to Annex 4.9). Not all items of the LR pdf form correspond with information collected with the SDoC and MD forms.
- There is still much uncertainty about which components require an SDoC and MD and which not. For example, it is clear that metal components of hull and superstructure do not require IHM forms, but what about televisions? IHM forms are required for ship cabling, but not for cabling inside televisions. Televisions are considered as black boxes which are taken from board for recycling, so it seems to suffice to have them listed in the IHM as one unit. In many cases no IHM forms are requested for interior materials, although this seems to depend on the judgment of individual surveyors.
- It is true that it is difficult to get 100% coverage of all hazardous materials on board. To illustrate this: some suppliers supply “a box of nuts costing 100 Euros” and are reluctant to issue IHM forms for such limited supplies. However for all bigger installations and components it was possible to collect all required IHM forms.
1. Annex 1 - IHM services offered by ABS

ABS addresses the EU Regulation in a separate document: ABS Summary EU Regn 1257-2013. However the Green_Passport_Guide summarized here does not yet refer to the EU Regulation.

The IHM services provided by ABS are summarized below. For full descriptions see the mentioned ABS documents.

1.1. ABS - Guide for the Class Notation Green Passport (GP)


This Guide is largely based on the IMO guide, extended with specific ABS additions and comments that are mostly related to survey and certification issues. The below text should be read in conjunction with the IMO guide discussed in Chapter 2.

1.2. ABS - IHM Services for the initial approval of new ships

(ABS Document Green_Passport_Guide_e-Feb14, section 3)

Documentation in the form of IHM booklet, drawings, or tables noting the use of hazardous materials, quantity and location, are to be submitted to the ABS Plan Review Office for review. Upon completion of the review of the IHM by the ABS Plan Review Office, an onboard auditing survey is to be carried out by an ABS Surveyor.

1.3. ABS - IHM services for the initial approval of existing ships

(ABS Document Green_Passport_Guide_e-Feb14, section 4)

Documentation in the form of Visual/Sampling Check Plan, IHM booklet, Hazmat (HM) Checklist, Records of Sample Checks and Location Diagram of Hazmat are to be submitted to the ABS Plan Review Office for approval or information. For the initial approval of the IHM developed, an onboard auditing survey by an ABS Surveyor is to be conducted.

1.4. ABS - IHM Services for Certification, Maintenance, and Survey


Upon completion of the verification surveys, the initial IHM Booklet, consisting of the ship details and Part I of the Inventory, is accepted and a certificate issued. The GP Notation is then granted and included in the ABS Record.

An annual verification survey is to be carried out in the course of completing other periodical surveys. Any changes to the materials in the IHM Booklet’s inventory should be noted by the ship’s crew and verified by the attending Surveyor. Upon satisfactory review and verification, the Green Passport certificate will be endorsed.

In addition to any survey requirements, the maintenance of the GP notation may require incorporation of new requirements that may be incorporated into the ABS Guide from time to time.
1.5. **ABS - Inventory Booklet and Sample Green Passport Form**

(ABS Document *Green_Passport_Guide_e-Feb14, Appendix 2*)

Appendix 2 to the ABS guide provides a Standard Format of Inventory Booklet and Sample Green Passport Form.

1.6. **ABS - Additional information:**

The ABS Document *Green_Passport_Guide_e-Feb14* can be downloaded from:

www.eagle.org (select Rules & Resources | Rules & Guides | search keyword: Green)

1.7. **ABS - Contact information:**

ABS can be contacted via their website www.eagle.org (select About us | Find Us)
2. **Annex 2 - IHM services offered by ClassNK**

2.1. **ClassNK**

Nippon Kaiji Kyokai is the Japanese ship Classification Society. It is also known by the brand name “ClassNK”. For further ClassNK information on recycling see [www.classnk.com](http://www.classnk.com) (select Statutory Services | Ship Recycling Convention). This webpage contains a summary of the IHM requirements as described in chapter 2 and provides EXCEL templates for Material Declarations (MD) and Supplier’s Declaration of Conformity (SDoC). Additional ClassNK comments are listed below.

2.2. **ClassNK - Services for the initial IHM approval of new ships**

In order to develop the IHM for new ships, shipbuilders and suppliers have to exchange and store a huge number of paper documents. This may be a serious burden for shipbuilders and suppliers. ClassNK has developed “PrimeShip-GREEN/SRM” to facilitate IHM development utilizing a Cloud Computing System in cooperation with IBM.

2.3. **ClassNK - Services for the initial IHM approval of existing ships**

According to the IMO Guidelines, shipowners may draw upon “expert assistance” for the development of Part I of the IHM for existing ships. A subsidiary of ClassNK, “ClassNK Consulting Service,” provides services to develop the IHM for existing ships as an “expert” to meet requests from shipowners.

2.4. **ClassNK - Issuance of Statement of Fact (SOF) for the IHM**

ClassNK issues SOF for Part I of the IHM developed in preparation for the incoming Convention. SOF will be smoothly converted into an International Certificate on Inventory of Hazardous Materials after the entry into force of the Convention. ClassNK recommends the early preparation of the IHM because the need for experts is expected to increase drastically after the entry into force of the Convention.

2.5. **ClassNK - PrimeShip-GREEN/SRM, a software tool for the development of IHM**

(PS-Green/SRM Document ebro_primeship-green_srm)

PrimeShip-GREEN/SRM is a software tool for the development of the IHM required for all ships greater than 500GT by the IMO Hong Kong Convention on Ship Recycling. PrimeShip-GREEN/SRM allows suppliers and shipbuilders to exchange information electronically to reduce paperwork related to IHM development.

After registration to the system via Internet, the people engaged in the development of the IHM, including shipbuilders and suppliers, are able to perform all necessary work for IHM development on the system website.

For registration to “PrimeShip-GREEN/SRM,” access [www.psgreensrm.com](http://www.psgreensrm.com), select Register Organization on the login page and input the necessary information.

2.6. **ClassNK - Additional information**

The following PrimeShip-GREEN/SRM documents can be downloaded from
www.psgreensrm.com (select Help | Manuals):

- How to Register;
- How to Prepare MD and SDoC;
- Detailed manual.

2.7. ClassNK - Contact information

Contact person: Masuaki Urata

E-mail: Masuaki Urata <urata@classnk.or.jp>

PrimeShip-GREEN/SRM can be contacted via their website www.psgreensrm.com and mail srpt@classnk.or.jp
3. **Annex 3 - IHM services offered by DNV-GL**

DNV-GL provides a number of services related to the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 (HKC) and the new European Ship Recycling Regulation (EUSRR). The services relate to composing the Inventory of Hazardous Materials (IHM) for new and existing ships, web-based software solutions, availability of specialist in the field of hazardous materials (HazMats) and certification.

The services provided are summarized below. For full descriptions see the referred pdf DNV-GL documents.

### 3.1. DNV-GL - IHM Services for new ships

(DNV-GL document *NB-IHM_2014-08_Web*).

Tasks for the shipyard in preparing the IHM for a newbuild:

1. Identify the component and equipment suppliers;
2. Request the SDoC and MD from suppliers;
3. Collect the SDoC and MD documents MD from suppliers;
4. Organise the SDoC and MD by location and quantity;
5. Prepare Part I of the IHM;
6. Send the IHM to a recognised organisation for certification.

### 3.2. DNV-GL - IHM services for existing ships

(DNV-GL document *FiS-IHM_2014-08_Web*).

The process consists of the following basic five steps:

1. Collection of necessary information, with utilisation of the indicative list;
2. Assessment of collected information;
3. Preparation of Visual/Sampling Check Plan;
4. Onboard Visual/Sampling Check;
5. Preparation of Part I of the IHM and related documentation as well as initial survey and issuance of certificate.

### 3.3. DNV-GL - Programme for managing hazardous materials on board

(DNV-GL document *HazMat_inspection_2014-08_Web*)

To fulfil individual requirements, DNV-GL has designed an integrated and sustainable programme for managing HazMats onboard ships through the ship’s entire life cycle.

DNV-GL Maritime Advisory service offers “Material Declaration Consulting for Shipyards and Suppliers” based on individually tailored concepts for the smart establishment and management of integrated Material Declaration databases. Furthermore, DNV-GL’s Maritime Academy offers specific advanced training courses.

### 3.4. DNV-GL - Description of the IHM Green Server (IGS)

(DNV-GL document *IHM_IGS_2014-08_Web*)

IGS is a web-based software application for the preparation and maintenance of an IHM, enabling:
• Shipyards to prepare Material Declaration (MD) and Suppliers Declaration of Conformity (SDoC) documentation from the supply chain;
• Shipowners to manage the IHMs of their fleet during the life cycle of the ships;
• HazMat experts to prepare the IHM based on the Visual/Sampling Check Plan (VSCP) inspection pattern.

3.5. DNV-GL - Additional information

Concerning the industry as a whole being not yet ready to provide 100% of the required MDs 100% of the time DNV-GL stressed that the IHM services are still in the developing stage. Therefore suppliers need to adopt the requirements through certain steps up to full compliance effective application of legislation. Certain components can be excluded from investigation scope due to exemption list of the Convention or due to knowledge about product content. The indicative list of the Convention and some individual list of class societies and/or other expert parties give indications for the crucial parts on board of a ship.

DNV-GL has done some IHMs and non-asbestos certification for yachts just recently. Depending on the performance of the shipyard (warehouse management) it seems also to be reliable as well to monitor IHM compliance through store audit. At least for general components used by shipyards that could be considered.

For the purpose of a detailed quotation DNV-GL needs to know more details such as:

• Number of ships
• Ship type
• Ship age
• NB or FIS
• Time line
• Location

For newbuilds the shipyard has to prepare the IHM upon request of the owner. For vessels in operation the shipowner has to manage the preparation and maintenance of the IHM.

3.6. DNV-GL - Contact information

Contact person: Gerhard Aulbert, Global Head of Practice Ship Recycling, Global Practice Ship Recycling DNV GL – Maritime.

E-mail: gerhard.aulbert@dnvgl.com
Mobile +49 172 4200675 | Direct +49 40 36149 7786

www.dnvgl.com | LinkedIn
4. **Annex 4 - IHM services offered by LR**

4.1. **LR - IMO Hong Kong Convention on Ship Recycling**

The Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009, draws upon the existing guidelines that the original Lloyd’s Register ‘Green Passport’ inventory was based on, but it is far larger in terms of scope, and more detailed in application. While the Convention still relies on the concept of a ‘Green Passport’, the term itself is no longer used. It is now known as the ‘Inventory of Hazardous Materials’ (IHM). The IHM still covers the whole life of the ship, from construction and operation to preparation for scrapping at the end of the ship’s useful life.

4.2. **LR - EU Regulation 1257/2013 on Ship Recycling**

The EU Regulation is mostly aligned with the Hong Kong Convention but some aspects differ. The requirements for an IHM are expected to be more onerous than for the Hong Kong Convention’s Inventory. It requires the establishment of a list of approved ship recycling facilities (the “EU List”) which meet the design, construction and operation requirements of the EU but may be anywhere in the world. Guidance is expected to be produced by the European Commission on implementation. Newbuildings will need an IHM not later than 31 December, 2018, whereas ships going for recycling will need an IHM as soon as any EU List is published; but not before 31 December, 2014. The EU List itself is not expected before 31 December, 2016. The situation is complicated, to say the least. Lloyd’s Register is working towards ensuring IHMs and procedures comply with both the EU Regulation but, until the EU guidance is published, LR can't complete this.

LR aims to offer combined HKC and EU Regulation certification services before the application date of the EU Regulation, regardless of flag, thus helping to ensure a level playing field and avoid issues with change of flag during construction / on delivery etc.

Further details on the EU Regulation can be found on Lloyd’s Register’s ship recycling web pages (www.lr.org/shiprecycling).

4.3. **LR - IHM services**

The IHM services provided by LR are summarized below. For full descriptions see the referred LR documents.


This Guide covers Part I of the IHM.

As safety and environmental legislation develops, at which time additional detail may be required. This is why the concepts of maintenance and annual survey are essential to developing an IHM which will retain its usefulness throughout the life of the ship. The Hong Kong Convention requires that the IHM has a ‘renewal survey’ every five years, and that the Inventory is updated whenever there is a ‘significant’ change.
4.5. LR - IHM Services for the initial approval of new ships

(LR Document Guide to the IHM 2014-01, para 2.3.1)

The shipyard prepares the IHM for new ships. An LR new construction site team will review and periodically audit the processes that the shipyard has implemented to capture the hazardous materials used to build the ship. The shipowner’s requirement for an IHM should be included on the ‘Request for First Entry’ which forms the basis of the contract between Lloyd’s Register and the owner for a new ship. When the LR site office receives a ‘Request for First Entry’ they will start liaising with the shipyard to facilitate the process and will provide supporting materials including the LR Dynamic PDF Inventory template (refer to LR Dynamic PDF eForm below).

Although the ‘Request for First Entry’ forms the basis of the contract between LR and the owner, it's actually a direct contract between LR and the Shipyard. (Basically, if the shipowner wants an LR approved IHM on delivery they need to let the shipyard know at contract signing - and it will then be included on the Request for First Entry. IHM can be added as an addendum to the initial contract at a later date).

A major issue in the newbuilding process is the control of subcontractors and subcontracted supply. The only way to control this process is through the supply contract. Therefore, contracts will need to recognise that all relevant materials, locations and quantities have to be identified and the information controlled. With this in mind, the IMO Guidelines utilise the concept of ‘Material Declarations’ (MD). MDs will need to be completed by anyone supplying items, components or materials to go on board the ship for its structure or equipment.

LR provides a covering letter which the shipyard can use to explain the use and purpose of the Material Declarations to their subcontractors. An example of this letter along with an example ‘Form of MD’ is provided in the Guide to the IHM 2014-01. The LR site team will undertake spot checks throughout the build process to ensure that the contents of the IHM prepared by the shipyard are an acceptable representation of the items on board. The site team will subsequently issue an approved Inventory and an IHM ‘Statement of Compliance’ on delivery, both of which should remain on board the ship.

4.6. LR - IHM services for the initial approval of existing ships

(LR Document Guide to the IHM 2014-01, para 2.3.2)

The shipowner prepares the IHM and submits it along with the required supporting documentation, including the ‘Visual/Sampling Check Plan’ (refer to Guide to the IHM 2014-01, Chapter 3 below). The Approval Team reviews the Inventory and associated documentation for completeness, and checks hazards that would be expected for ships of a similar age and type have been addressed. The Approval Team will liaise with the shipowner to ensure the IHM meets the requirements of the Hong Kong Convention and to arrange a suitable time and location for the verification survey. On completion of the verification survey the attending surveyor will issue an IHM Statement of Compliance to the ship.
4.7. LR - IHM Services for maintaining the I HM


The Convention requires that the shipowner maintains the I HM, throughout the life of the ship, with renewal surveys at intervals not greater than five years.

For LR class vessels the I HM is reviewed on an annual basis, during the annual class survey, to ensure that the ship continues to comply with the Convention requirements. Any changes made to the approved I HM should be made known to the attending surveyor. When the original Statement of Compliance expires a further five year certificate will be issued by the attending surveyor.

For non-LR class vessels there will be no annual review on board. Instead, an additional survey, either general or partial, according to the circumstances, may be made at the request of the shipowner after a change, replacement or significant repair has taken place. Additionally, three months before the Statement of Compliance expiry date, a renewal will be required before a further five year Statement of Compliance can be issued.

4.8. LR - Compiling the Inventory of Hazardous Materials on board ships


Chapter 3 of LR Guide to the I HM provides guidance on how to compose an I HM for an existing ship.

Note that for existing ships the Hong Kong Convention does require sampling to be carried out: This requirement is as follows: “Existing ships shall comply as far as practicable with paragraph 1... The Hazardous Materials listed in Appendix 1, at least, shall be identified when the Inventory is developed. For existing ships, a plan shall be prepared describing the visual/sampling check by which the Inventory of Hazardous Materials is developed, taking into account the guidelines developed by the Organization.”

Recommend information on LR Approved "Hazardous Materials Service Suppliers" is added to this section - a summary can be found in section 3.2.2 of the LR Guide to the I HM. (In brief, the shipowner can complete the I HM themselves or call upon expert assistance from 'hazmat' experts. If sampling is to be carried out then using expert assistance is a must).

4.9. LR - Dynamic PDF eForm

(LR Document LR Green Passport (I HM) v2 0 and Green Passport (I HM) v2 0 (c)2014 User Guide)

LR provides a Dynamic PDF eForm for compiling the I HM. The PDF eForm contains drop down lists and hover help fields, which act as an additional guide during the compilation process. The Inventory template should be opened with Adobe Free Reader or Adobe Acrobat Standard; Lloyd’s Register cannot accept other versions of the I HM

4.10. LR - Additional information

Following additional information was provided by LR:
LR has been party to pilot projects through LR’s work on the Sustainable Shipping Initiative ‘Closed Loop Materials Management’ work stream. In all instances it’s clear that the industry as a whole is not yet ready to provide 100% of the required MDs 100% of the time. Things are improving, and more and more shipyards / suppliers are encountering the MD forms. The IMO Convention and the EU Regulation will mean that suppliers will have to comply at some stage, and therefore contracts will have to recognise this fact. It’s a slow process and a learning curve for all... For the time being, for both newbuildings and existing ships, LR’s IHM approval and subsequent issuance of a Statement of Compliance is in accordance with Regulation 5.2 of the Hong Kong Convention. In other words, LR is insisting on Appendix 1 hazards (asbestos, TBTs, PCBs and ODS) being excluded / restricted at newbuild – in line with existing SOLAS, MARPOL, AFS regulation – and Appendix 2 hazards being recorded as far as practicable. This is because ships currently under construction will be delivered before the Convention enters into force and will therefore be existing ships. LR will have to change this procedure when the time comes.

- LR provides IHM services since 2004 (Green Passport);
- In 2009 LR issued its first IHM;
- At the time of writing, more than 1,900 ships have signed up for LR’s inventory certification services (1,400+ at new construction and 500+ existing ships, 190 of which aren’t classed with LR).. This includes 12 superyachts;
- LR Approved Service Suppliers can compile the IHM for newbuildings and existing ships.

### 4.11. **LR - Contact information**

Contact person: Jim Heath, Ship Recycling Product Development Manager, Fleet Services.

Lloyd’s Register Marine.

E-mail: [jim.heath@lr.org](mailto:jim.heath@lr.org)

Mobile +44 (0)7823 552 849 | Direct +44 (0)3304 140 160

[www.lr.org](http://www.lr.org) | [LinkedIn](https://www.linkedin.com) | [Twitter](https://twitter.com) | [Facebook](https://www.facebook.com)
5. **Annex 5 - IHM services offered by RINA**

Only limited information was received about IHM services offered by RINA.

5.1. **RINA - Green Passport Plus**

(RINA Document *Green_Passport_Plus*).

In application of the requirements of the HKC, RINA’s Green Passport Plus is a document providing information with regard to potentially hazardous materials utilized in the construction of the ship, its equipment and systems, developed taking into account IMO Resolution MEPC.197 (62) – 2011 Guidelines for the Development of the Inventory of Hazardous Materials.

The Green Passport Plus document accompanies the ship throughout its operating life and incorporates all relevant design and equipment changes, with the final owner delivering the document, with the ship, to the recycling facility.

5.2. **RINA - Contact information**

Contact person: Fiorenzo SPADONI, Pleasure Vessels Sector Manager

RINA Services S.p.A. Marine

E-mail: [Fiorenzo.Spadoni@rina.org](mailto:Fiorenzo.Spadoni@rina.org)

Mobile +39 335 1998040 | Direct +39 010 5385410

www.rina.org | LinkedIn Twitter Facebook
6. **Annex 6 – EU List of hazards for all ships**

The Annex below represents Annex 1 of EU Regulation 1257/2013 which identifies the hazardous materials whose installation or use on ships is prohibited or restricted. Note that this Annex will likely be revised in the EC/EMSA guidance.

![Image of EU List of hazards for all ships]

### ANNEX I

**CONTROL OF HAZARDOUS MATERIALS**

<table>
<thead>
<tr>
<th>Hazardous Material</th>
<th>Definition</th>
<th>Control measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asbestos</td>
<td>Materials containing asbestos</td>
<td>For all ships, new installation of materials which contain asbestos shall be prohibited.</td>
</tr>
<tr>
<td>Ozone-depleting substances</td>
<td>Controlled substances defined in Article 1(4) of the Montreal Protocol on Substances that Deplete the Ozone Layer, 1987, listed in Annexes A, B, C or E to that Protocol in force at the time of application or interpretation of this Annex.</td>
<td>New installations which contain ozone-depleting substances shall be prohibited on all ships.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Halon 1211 Bromochlorodifluoromethane</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Halon 1301 Bromotrifluoromethane</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Halon 2402 1,2-Dibromo-1,1,2,2-tetrafluoroethane (also known as Halon 11413)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CFC-11 Trichlorofluoromethane</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CFC-12 Dichlorodifluoromethane</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CFC-113 1,1,2-Trichloro-1,2,2-trifluoroethane</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CFC-114 1,2-Dichloro-1,1,2,2-tetrafluoroethane</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CFC-115 Chloropentafluoromethane</td>
<td></td>
<td></td>
</tr>
<tr>
<td>HCFC-22 Chlorodifluoromethane</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Polychlorinated biphenyls (PCB)</td>
<td>Polychlorinated biphenyl means aromatic compounds formed in such a manner that the hydrogen atoms on the biphenyl molecule (two benzene rings bonded together by a single carbon-carbon bond) may be replaced by up to ten chlorine atoms</td>
<td>For all ships, new installation of materials which contain Polychlorinated biphenyls shall be prohibited.</td>
</tr>
<tr>
<td>Perfluorooctane sulfonic acid (PFOS) (2)</td>
<td>'perfluorooctane sulfonic acid' (PFOS) means perfluorooctane sulfonic acid and its derivatives</td>
<td>New installations which contain perfluorooctane sulfonic acid (PFOS) and its derivatives shall be prohibited in accordance with Regulation (EC) No 830/2004 of the European Parliament and of the Council (2)</td>
</tr>
<tr>
<td>Anti-fouling compounds and systems</td>
<td>Anti-fouling compounds and systems regulated under Annex I to the International Convention on the Control of Harmful Anti-fouling Systems on Ships, 2001 (AFS Convention) in force at the time of application or interpretation of this Annex.</td>
<td>1. No ship may apply anti-fouling systems containing organotin compounds as a biocide or any other anti-fouling system whose application or use is prohibited by the AFS Convention.</td>
</tr>
</tbody>
</table>

---

23
<table>
<thead>
<tr>
<th>Hazardous Material</th>
<th>Definitions</th>
<th>Control measures</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>2. No new ship or new installations on ships shall apply or employ antifouling compounds or systems in a manner inconsistent with the AFS Convention.</td>
</tr>
</tbody>
</table>

(1) Not applicable for ships flying the flag of a third country.
7. **Annex 7 – EU List of items for the IHM**

The Annex below represents Annex 2 of EU Regulation 1257/2013 listing the items to be included in the ship’s Inventory of Hazardous Materials.

Note that the Annex will likely be revised in the EC/EMSA guidance.

![EU List of items for the IHM](image-url)
8. Annex 8 – ICOMIA Guidance for Material Declaration

See next page for Form of Material Declaration

<table>
<thead>
<tr>
<th></th>
<th>HOW TO COMPLETE FORM OF MATERIAL DECLARATION (MD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>a</td>
<td>Date of declaration</td>
</tr>
<tr>
<td>b</td>
<td>Material declaration identification number. Supplier must maintain a unique identification number and sequence.</td>
</tr>
<tr>
<td>c</td>
<td>Company/suppliers name</td>
</tr>
<tr>
<td>d</td>
<td>When applicable, division or department responsible for the equipment relating to the MD</td>
</tr>
<tr>
<td>e</td>
<td>Company/suppliers address</td>
</tr>
<tr>
<td>f</td>
<td>Company/supplier contact person. Ideally an employee and if applicable, within the division listed in (d)</td>
</tr>
<tr>
<td>g</td>
<td>Telephone number of company/supplier. If applicable, include direct dial of person responsible for the MD</td>
</tr>
<tr>
<td>h</td>
<td>Fax number of company/supplier. And if applicable, direct fax number</td>
</tr>
<tr>
<td>i</td>
<td>Email address, Include both general and direct email of person responsible for the MD</td>
</tr>
<tr>
<td>j</td>
<td>SDoC Identification Number must be a unique, sequential ID devised by supplier/company (Must be the same as on SDoC form, #1)</td>
</tr>
<tr>
<td>k</td>
<td>Insert a product description or product catalogue name</td>
</tr>
<tr>
<td>l</td>
<td>Product code/number found on the product label or catalogue</td>
</tr>
<tr>
<td>m</td>
<td>“Amount” is the total number of product(s), for example, “m” is the total number of “unit n”</td>
</tr>
<tr>
<td>n</td>
<td>See and select a unit type</td>
</tr>
<tr>
<td>o</td>
<td>Provide extra product description and information besides the name of the product (also to be used on SDoC form, #3)</td>
</tr>
<tr>
<td>p</td>
<td>TABLE A - No Threshold Level - Refer to Appendix 8 IMO IHM Table A Column 1 &gt; If present, match your substance to Material Name in MD Table A Column 1 &gt; Write “No” in MD Table A Column 2 (to demonstrate presence of material) &gt; Ignore shaded MD Table A Columns 3-4</td>
</tr>
<tr>
<td>pi</td>
<td>TABLE A - Threshold Level - Refer to Appendix 8 IMO IHM Table A Column 1 &gt; If present, match your substance to Material Name in MD Table A Column 1 &gt; Depending on Threshold Level, write “yes” or “No” in MD Table A Column 2 &gt; If applicable, complete MD Table A Column 3 by inserting the “Mass” - the total amount of material present in product and the “Unit” - e.g. mg &gt; Complete Table A Column 4 by identifying where material is used in product</td>
</tr>
<tr>
<td>q</td>
<td>TABLE B - Refer to Appendix 8 IMO IHM Table B Column 1 &gt; If present, match your substance to Material Name in MD Table B Column 1 &gt; Depending on Threshold Level, write “yes” or “No” in MD Table B Column 2 &gt; If applicable, complete MD Table B Column 3 by inserting the “Mass” - the total amount of material present in product and the “Unit” - e.g. mg &gt; Complete Table B Column 4 by identifying where material is used in product</td>
</tr>
<tr>
<td>*</td>
<td>If appropriate add other relevant information on product or project related to shipyard or hull number etc.</td>
</tr>
<tr>
<td>**</td>
<td>Company stamp, signature and date</td>
</tr>
</tbody>
</table>
APPENDIX 6

FORM OF MATERIAL DECLARATION

<table>
<thead>
<tr>
<th>&lt;Date of Declaration&gt;</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;MD ID Number&gt; (Supplier to assign a Unique Identifier Number to each MD)</td>
<td></td>
</tr>
<tr>
<td>MD-ID-No.</td>
<td></td>
</tr>
<tr>
<td>&lt;Other Information&gt; (e.g. Shipyard, hull number: if applicable)</td>
<td></td>
</tr>
<tr>
<td>Remark 1</td>
<td></td>
</tr>
<tr>
<td>Remark 2</td>
<td></td>
</tr>
<tr>
<td>Remark 3</td>
<td></td>
</tr>
<tr>
<td>Company Name</td>
<td></td>
</tr>
<tr>
<td>Division Name</td>
<td></td>
</tr>
<tr>
<td>Address</td>
<td></td>
</tr>
<tr>
<td>Contact Person</td>
<td></td>
</tr>
<tr>
<td>Telephone Number</td>
<td></td>
</tr>
<tr>
<td>Fax Number</td>
<td></td>
</tr>
<tr>
<td>Email Address</td>
<td></td>
</tr>
<tr>
<td>S/W ID no.</td>
<td></td>
</tr>
</tbody>
</table>

**Product Information**

<table>
<thead>
<tr>
<th>Product Name</th>
<th>Product Number</th>
<th>Description</th>
<th>Amount</th>
<th>Unit</th>
<th>Product Information</th>
</tr>
</thead>
</table>

**Materials Information**

This materials information shows the amount of hazardous materials contained in.

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 3</th>
<th>Column 4</th>
</tr>
</thead>
</table>

**Table A**

<table>
<thead>
<tr>
<th>Material Name</th>
<th>Threshold Level</th>
<th>Present above threshold level</th>
<th>If yes, material mass</th>
<th>If yes, information on where it is used</th>
</tr>
</thead>
</table>

**Table B**

<table>
<thead>
<tr>
<th>Material Name</th>
<th>Threshold Level</th>
<th>Present above threshold level</th>
<th>If yes, material mass</th>
<th>If yes, information on where it is used</th>
</tr>
</thead>
</table>

**DATE/SIGNATURE**

**COMPANY STAMP**

See next page for Form of Suppliers Declaration of Conformity

<table>
<thead>
<tr>
<th>a</th>
<th>SDoC Identification Number must be a unique, sequential ID devised by supplier/company (also to be used on MD form, j)</th>
</tr>
</thead>
<tbody>
<tr>
<td>b</td>
<td>Name of supplier/company</td>
</tr>
<tr>
<td>c</td>
<td>Address of supplier/company</td>
</tr>
<tr>
<td>d</td>
<td>Provide extra product description and information besides the name of the product (Must be the same as on MD form, a). May list several items covered by separate MD forms</td>
</tr>
<tr>
<td>e</td>
<td>If applicable, insert International Standard; Class certificate or other technical documentation references. Must be in compliance with the latest reviews of design, which normally contain a drawing number. If a revision, particular part may be in compliance with ISO and or National Standards. The date of the revision must be included.</td>
</tr>
<tr>
<td>f</td>
<td>Additional (relevant) information relating to company or product</td>
</tr>
<tr>
<td>g</td>
<td>Company name</td>
</tr>
<tr>
<td>h</td>
<td>As described</td>
</tr>
<tr>
<td>i</td>
<td>Name and function of authorised Company/supplier person. Should be responsible for the MD. When small companies (mostly named mama and papa companies) it will be the owner of the company</td>
</tr>
<tr>
<td>j</td>
<td>Signature of authorised Company/supplier person. Should be responsible for the MD. When small companies (mostly named mama and papa companies) it will be the owner of the company</td>
</tr>
<tr>
<td>*</td>
<td>Company stamp</td>
</tr>
</tbody>
</table>
APPENDIX 7

FORM OF SUPPLIER'S DECLARATION OF CONFORMITY

Supplier's Declaration of Conformity for Material Declaration Management

1) Identification Number: 

2) Issuer's Name: 
   Issuer's Address: 

3) Object(s) of the Declaration: 

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

5) Document No. | Title | Edition/Date of Issue 

6) Additional Information: 

Signed for and on behalf of:  
(Place and date of issue) 

7) (Name, Function) | (Signature) 

Form provided by ICOMIA