

Subject

Amendment of IMO's Guidelines for the development of the Inventory of Hazardous Materials regarding Ship Recycling Convention (RESOLUTION MEPC.405(83))

ClassNK

Technical Information

No. TEC-1353
Date 2 July 2025

To whom it may concern

At the eighty-third session of the International Maritime Organization (IMO) Marine Environment Protection Committee (MEPC 83), amendments to the guidelines for the development of the Inventory of Hazardous Materials (IHM), as required under the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, were discussed and were subsequently adopted on 11 April 2025 as RESOLUTION MEPC.405(83) "AMENDMENTS TO THE 2023 GUIDELINES FOR THE DEVELOPMENT OF THE INVENTORY OF HAZARDOUS MATERIALS (RESOLUTION MEPC.379(80))".

A summary of the amendments to the Guidelines is provided below.

- The amendments to the "2023 Guidelines for the Development of the Inventory of Hazardous Materials" adopted on 7 July 2023, clarifying the threshold values of cybutryne in anti-fouling system coating samples, either taken from wet paint containers or taken directly from hull.

The Member Governments were invited to apply the amendments as soon as possible, and no later than 26 June 2025.

Given such short notice between the publication of the RESOLUTION MEPC.405(83) (hereinafter referred to as the "2025 revision of the IMO Guidelines") and its application date, ClassNK would request all concerned stakeholders to take the necessary actions as outlined below with respect to the 2025 revision of the IMO Guidelines.

-1. Actions for Ships Already Holding IHM Part I

- (1) The persons responsible for the IHM maintenance are requested to confirm that, in principle, the Material Declarations (MDs) prepared on or after 26 June 2025 are based on the new format in accordance with the 2025 revision of the IMO Guidelines. In addition, the IHM maintenance procedures should be revised.
- (2) "An Example of Procedure to Maintain Part I of IHM" published on the ClassNK website has already been updated to version 2025.06 to reflect the 2025 revision of the IMO Guidelines. Therefore, if the current IHM maintenance procedures have been established based on the previous example, replacing "Appendix 6: Material Declaration" with the new version would ensure compliance with the 2025 revision of the IMO Guidelines.

(To be continued)

NOTES:

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- (3) ClassNK surveyor will confirm that the format of the MDs prepared on or after the issuance date of this Technical Information comply with the 2025 revision of the IMO Guidelines at IHM related surveys.
- 2. Actions for Development of IHM Part I by New Ship Method
- (1) As the 2025 revision of the IMO Guidelines amends the threshold for cybutryne in anti-fouling system coatings, the application of which is already prohibited on new ships, only administrative changes to the format of the MD are required for new ships.
- (2) Suppliers are requested, in principle, to prepare MDs in the new format compliant with the 2025 revision of the IMO Guidelines for submissions made on or after 26 June 2025.
- (3) Shipyards are requested, in principle, to request suppliers to prepare MDs in the new format compliant with the 2025 revision of the IMO Guidelines for any MDs to be received on or after 26 June 2025.
- (4) ClassNK will remind applicants, during the document review of IHM Part I submitted on or after the issuance date of this Technical Information, to collect MDs in the new format compliant with the 2025 revision of the IMO Guidelines.
ClassNK kindly requests the MDs to be prepared in the new format for new ships as far as practicable.
- (5) Please note that, notwithstanding the above, MDs may need to be collected again using the new format in case the flag State specifically requires MDs in accordance with the 2025 revision of the IMO Guidelines.
- 3. Other Actions by ClassNK
- (1) For PrimeShip-GREEN/SRM users, ClassNK has released a system update to support the development of the Inventory of Hazardous Materials, in response to the adoption of the 2025 revision of the IMO Guidelines.
All MDs prepared using PrimeShip-GREEN/SRM will be in the new format.
- (2) For non-PrimeShip-GREEN/SRM users, ClassNK provides the new format of the MD compliant with the 2025 revision of the IMO Guidelines, which can be downloaded from our website. This format is provided as an Excel file.

(To be continued)

- (3) Also, PrimeShip-GREEN/SRM has been updated to implement a new function for MD registration, enabling users to import data from the new MD format downloaded from our website.

Previously, MDs submitted by suppliers not using PrimeShip-GREEN/SRM were required to be manually entered into the system by individual IHM Part I developers or those responsible for IHM maintenance.

With this update, IHM Part I developers or maintenance personnel can register MDs semi-automatically in PrimeShip-GREEN/SRM when suppliers prepare MDs using the Excel file in (2) above.

For further details, please refer to PrimeShip-GREEN/SRM.

The latest information on instructions in relation to the requirements of the Ship Recycling Convention is available on the following ClassNK website.

TOP > Products & Services > Statutory Services > Ship Recycling Convention
<https://www.classnk.or.jp/hp/en/activities/statutory/shiprecycle/index.html>

For any questions about the above, please contact:

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Attachment:

1. RESOLUTION MEPC.405(83)

ANNEX 13

RESOLUTION MEPC.405(83) (adopted on 11 April 2025)

AMENDMENTS TO THE 2023 GUIDELINES FOR THE DEVELOPMENT OF THE INVENTORY OF HAZARDOUS MATERIALS (RESOLUTION MEPC.379(80))

THE MARINE ENVIRONMENT PROTECTION COMMITTEE,

RECALLING Article 38(a) of the Convention on the International Maritime Organization concerning the functions of the Marine Environment Protection Committee conferred upon it by international conventions for the prevention and control of marine pollution from ships,

RECALLING ALSO that the International Conference on the Safe and Environmentally Sound Recycling of Ships held in May 2009 adopted the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 (the Hong Kong Convention) together with six Conference resolutions,

NOTING that regulations 5.1 and 5.2 of the annex to the Hong Kong Convention require that ships shall have on board an Inventory of Hazardous Materials which shall be prepared and verified taking into account guidelines, including any threshold values and exemptions contained in those guidelines, developed by the Organization,

RECALLING that, at its sixty-second session, it adopted, by resolution MEPC.197(62), the *Guidelines for the development of the Inventory of Hazardous Materials*,

RECALLING ALSO that, at its sixty-eighth session, it adopted, by resolution MEPC.269(68), the *2015 Guidelines for the development of the Inventory of Hazardous Materials*, which superseded the Guidelines adopted through resolution MEPC.197(62), to improve the guidance on threshold values and exemptions,

RECALLING FURTHER that, at its eightieth session, it adopted, by resolution MEPC.379(80), the *2023 Guidelines for the development of the Inventory of Hazardous Materials* (2023 Guidelines), which superseded the Guidelines adopted through resolution MEPC.269(68), as a consequence of the introduction of controls on cybutryne through the amendments to annex 1 to the *International Convention on the Control of Harmful Anti-fouling Systems on Ships, 2001* (AFS Convention) (resolution MEPC.331(76)), which entered into force on 1 January 2023,

RECOGNIZING the need for amendments to the 2023 Guidelines to clarify the relevant threshold values in respect of cybutryne when samples are directly taken from the hull or when samples are taken from wet paint containers,

HAVING CONSIDERED, at its eighty-third session, the recommendation made by the Sub-Committee on Pollution Prevention and Response at its twelfth session,

1 ADOPTS amendments to the *2023 Guidelines for the development of the Inventory of Hazardous Materials* as set out in the annex to this resolution;

2 INVITES Member Governments to apply the 2023 Guidelines, as amended, as soon as possible, and no later than 26 June 2025;

3 AGREES to keep the 2023 Guidelines, as amended, under review in the light of experience gained with their application.

ANNEX

AMENDMENTS TO THE 2023 GUIDELINES FOR THE DEVELOPMENT OF THE INVENTORY OF HAZARDOUS MATERIALS (RESOLUTION MEPC.379(80))

Appendix 1

Items to be listed in the Inventory of Hazardous Materials

1 Row A-4 of table A is replaced by the following:

"

A-4	Anti-fouling systems containing organotin compounds as a biocide	x			2,500 mg total tin/kg ⁷
	Anti-fouling systems containing cybutryne	x			1,000 mg/kg ⁸ or 200 mg/kg ⁸

⁷ This threshold value is based on the *2022 Guidelines for brief sampling of anti-fouling systems on ships* (resolution MEPC.356(78)).

⁸ These threshold values are based on appendix I of the *2022 Guidelines for survey and certification of anti-fouling systems on ships* (resolution MEPC.358(78))."

Appendix 6

Form of Material Declaration

2 The last row of table A is replaced by the following:

"

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 A (materials listed in appendix 1 of the Convention)	Anti-fouling systems containing cybutryne	200 mg/kg ²⁰				

²⁰ This threshold value is based on appendix I of the *2022 Guidelines for survey and certification of anti-fouling systems on ships* (resolution MEPC.358(78)) for samples taken from wet paint containers."
