



Antigua and Barbuda
Maritime Administration

SOLAS Circular
No. 2021-001
Rev 1
26 April 2021

**SUBJECT: Enforcement of EU Ship Recycling regulation no. 1257/2013 (EU SRR)
Relating to the Inventory of Hazardous Materials**

REFERENCE:

- a) [EU Ship Recycling Regulation No. 1257/2013](#), relating to the Inventory of Hazardous Materials (IHM)
- b) [SOLAS Circular 2020-006](#) Inventory of Hazardous Materials (IHM) – Asbestos Found Onboard.
- c) [Miscellaneous Circular 2020-001](#) Novel Coronavirus (2019-nCoV)

TO: Ship-owners, operators, masters and officers of Antigua and Barbuda flagged ships, and recognized organizations.

1. PURPOSE

This Circular provides information on the notice recently adopted by the EU Commission providing guidelines on the enforcement of obligations under the EU Ship Recycling Regulation No. 1257/2013, relating to the Inventory of Hazardous Materials (IHM).

2. APPLICATION

This Circular applies to all Antigua and Barbuda flagged ships.

3. BACKGROUND

[SOLAS Circular 2020-006](#) Inventory of Hazardous Materials (IHM) – Asbestos Found Onboard gives details of the Inventory of Hazardous Materials (IHM) and Statement of Compliance (SoC) requirements, for Antigua and Barbuda ships visiting EU ports, from the 31 December 2020.

ADOMS wishes to draw the attention of all concerned to a notice recently adopted by the EU Commission providing guidelines on the enforcement of obligations under the EU Ship Recycling Regulation No. 1257/2013, relating to the Inventory of Hazardous Materials (IHM).

4. OBLIGATIONS AND RESPONSIBILITIES

1. Where, due to Covid-19 restrictions, it has not been possible to conduct the IHM initial survey, agreement has been given to our Recognized Organizations (ROs) to carry out remote surveys. This is subject to the RO complying with their remote survey procedures and using their trained and fully certified exclusive RO surveyors.
2. This is consistent with the remote audits and survey procedures, detailed in our [Miscellaneous Circular 2020-001](#) during the present Covid-19 pandemic.

3. In addition, there are several cases where ships will not be in full compliance with the IHM and SoC requirements, by 31 December 2020.
4. Reference should be made to the above EU Commission Notice which is available at:
https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:JOC_2020_349_R_0001
and provides guidance for a harmonized approach towards enforcement by the EU port State authorities.
5. Where the shipowner has started the process of IHM certification, but completion has been delayed due to Covid-19, then consideration will be given to postponement of the IHM compliance, until not later than 30 June 2021.
6. The shipowner will first however need to provide accepted evidence, that all possible measures were taken to undertake this IHM verification.
7. In such cases, our RO will then issue a Statement to this effect and this document should be placed onboard, together with the other documents showing the status of the IHM certification process, for port State inspections.

Issued by

Antigua and Barbuda
Department of Marine Services and Merchant Shipping
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