INTERTANKO

# Processes for the Development and Maintenance of Part 1 of the Inventory of Hazardous Materials

TWENTY 20

INTERTANKO

# Processes for the Development and Maintenance of Part 1 of the Inventory of Hazardous Materials (IHM)

All rights reserved. No part of this publication may be reproduced in any material form (including photocopying or storing it in any medium by electronic means and whether or not transiently or incidentally to some other use of this publication) without the written permission of INTERTANKO. Applications for INTERTANKO's written permission to reproduce any part of this publication should be addressed to the publisher.

© INTERTANKO 2020

While every effort has been made to ensure that the information contained in this publication is correct, neither the authors nor INTERTANKO can accept any responsibility for any errors or omissions or any consequences resulting therefrom.

No reliance should be placed on the information or advice contained in this publication without independent verification.

*Vers.1 – August 2020*

**Introduction** 3

**Background** 3

**1. Process for the Development of the IHM Part 1** 4

1.1 Notes on Figure 1: Process for the Development of the IHM Part 1 6

**2. Processes for Maintaining the IHM Part 1** 6

2.1 Obtaining the Material Declarations (MDs) and Supplier's Declaration of Conformity 7

2.2 Requisition of Spare Parts and Consumables 11

2.3 Onboard Process for checking the IHM and the Spare parts / Supplies on board 12

2.4 Designated person for maintaining the IHM 12

2.5 Regular review of the IHM 13

**3. Additional considerations** 14

3.1 IHM Maintenance Log 14

3.2 Use of software for maintaining the IHM Part 1 14

3.3 Asbestos management procedures 14

**References** 16

**Example IHM Maintenance Log** 17

# Introduction

The following document provides examples of process maps for developing and maintaining Part 1 of the Inventory of Hazardous Materials (IHM Part 1) on existing vessels in order to satisfy the requirements of both the EU Ship Recycling Regulation (EU SRR) and the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships (HKC). Together with the example process maps, general guidance on the procedures and a commentary on issues associated with compliance have been provided. This has been drafted based on experience, feedback and exchanges from and within INTERTANKO's Environment Committee.

## Background

Noting the 31 December 2020 deadline for enforcement of the EU SRR, INTERTANKO's Environment Committee agreed it was worthwhile sharing their experiences of developing and maintaining the IHM Part 1. As there are several resources already available for Members to gain an in-depth and detailed understanding of the EU SRR and HKC, the first-hand experiences of Members have instead been shared with a focus on the management processes and procedures that will need to be established in order to develop the IHM Part 1, as well as those procedures that will be necessary to ensure the IHM Part 1 remains updated and compliant. Illustrations have been used as a means of quickly summarising the example management processes.

A simple summary of the two compliance regimes associated with the requirement to develop and maintain IHMs is provided below. More detailed information on the EU SRR and HKC can be obtained from your Administration and/or Class Society. The full text of the regulations as well as industry guidance is available on INTERTANKO's website, www.INTERTANKO.com. Specific questions may also be directed to: **environment@INTERTANKO.com**.

### Hong Kong Convention and the IHM

While the HKC has not yet entered into force (*as of July 2020*), the International Maritime Organization (IMO) Guidelines for developing IHMs establishes the international standard and template for an IHM that will be applicable to both the HKC as well as the EU SRR. As such, developing an IHM in compliance with the HKC and its associated Guidelines will assist with compliance with the HKC when it enters into force and will also facilitate certification for compliance with the EU SRR. Note however, the small variance in hazardous materials that are to be included in Part 1 of IHM for compliance with the EU SRR.

### EU Ship Recycling Regulation and the IHM

From 31 December 2018, new EU-Flagged ships – and from 31 December 2020 existing EU-Flagged and non-EU-Flagged ships – calling at EU ports and anchorages should have on board a verified IHM which shall identify at least the hazardous material contained in the structure or equipment of the ship, their location and approximate quantities. The verified IHM is to be accompanied by a Statement of Compliance (non-EU-Flagged) or Inventory Certificate (EU-Flagged). The IHM is to be verified by Officers of Flag Administrations or by a Recognised Organisation authorised by the Flag Administration.

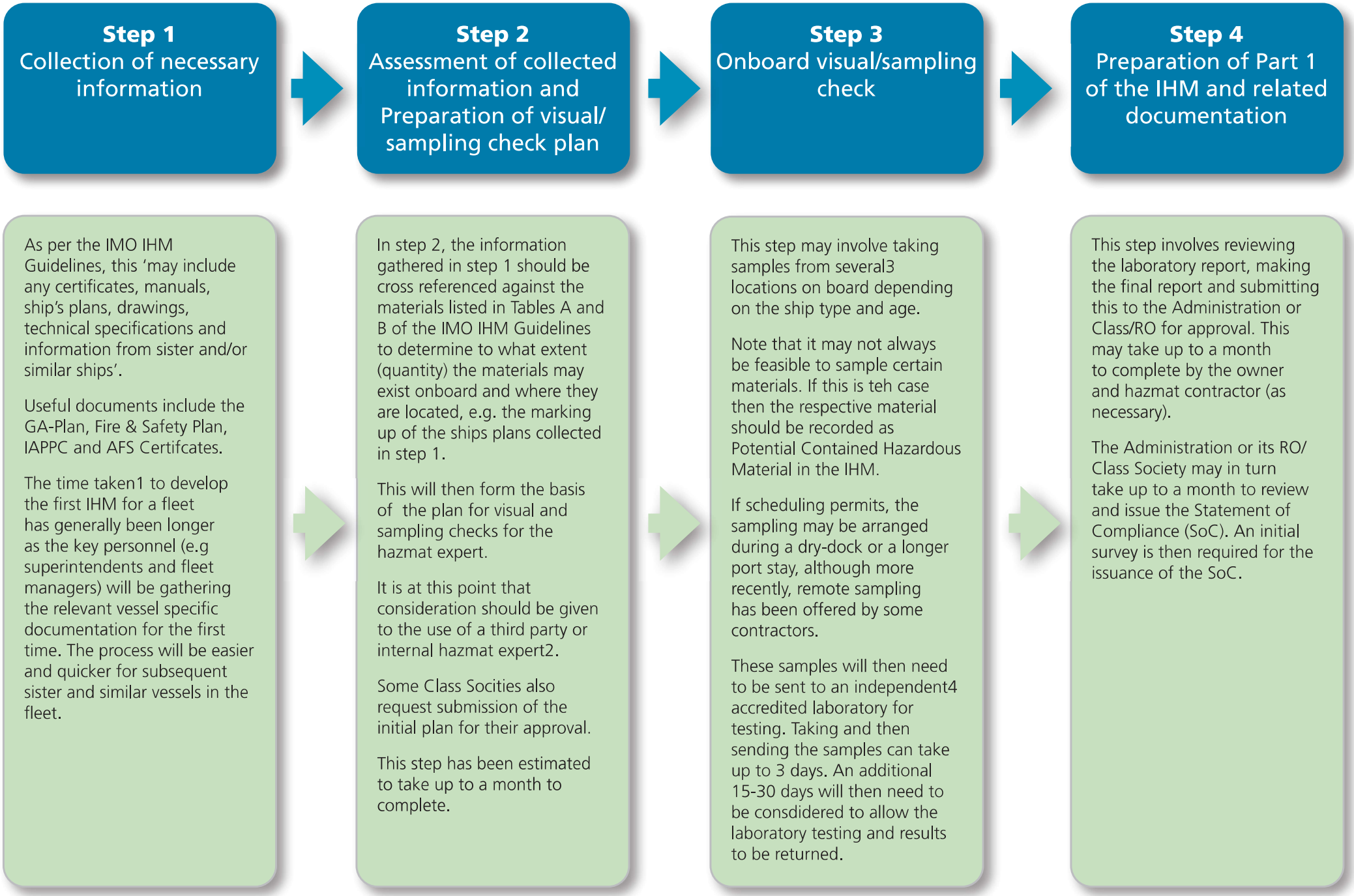
# 1. Process for the Development of the IHM Part 1

The diagram for developing the IHM Part 1, Figure 1, is based on the five steps recommended in the IMO's Guidelines for the development of the inventory of hazardous materials 2015 (IMO IHM Guidelines), section 4, and the flow diagram for developing the IHM Part 1 (appendix 4). This is supplemented by notes based on information received from INTERTANKO Members that have gone through the process of developing the IHM Part 1 for tankers within their fleet. The significant difference with the diagram offered in Figure 1 and the IMO's flow diagram is the merging of steps 2 and 3.

The European Maritime Safety Agency's (EMSA) Guidance on the Inventory of Hazardous Materials (EMSA IHM Guidance) also provides useful guidance on the development of the IHM Part 1 including an alternative version of the development process covering the collection and assessment of hazardous materials information for both new building and existing ships. Extensive cross-reference to the IMO IHM Guidelines is included in the EMSA IHM Guidance.

An understanding of the materials and their respective threshold values to be included in the IHM Part 1 is essential for those involved in developing the IHMs. Consideration must therefore be given to the materials and their threshold values contained in Appendixes I and II of the HKC (see also Tables A and B in Appendix I of the IMO IHM Guidelines) as well as Annexes I and II of the EU SRR.

**Figure 1. Process for the Development of the IHM Part 1**



### 1.1 Notes on Figure 1: Process for the Development of the IHM Part 1

1. **Timing.** Based on information received, estimated timeframes for developing IHMs, from start to receipt of the Statement of Compliance, vary from 3-6 months for the first vessel within a fleet and 1-3 months for each subsequent vessel.

2. **Hazmat Experts.** Some owners and managers have opted to train and certify internal personnel as hazmat experts in order to facilitate the process of developing the IHM. Internal hazmat experts can also assist with providing an oversight when maintaining the IHM. It is advisable to consult with the Administration early on if internal hazmat experts are intended to be used within the company. Some Administrations require approved hazmat contractors to be used and/or require approval with specific Class Societies. Any hazmat expert used (internal or third party) needs to be fully independent of the verifying and approval authority.

3. **Sampling.** Sampling is a complicated procedure and will require an evaluation of all relevant documentation for the vessel by a hazmat expert in order to determine, on a case-by-case basis, whether sampling is necessary and to what extent, e.g. the number of samples and the internationally recognised standards for sampling certain hazardous materials.

4. **Independence.** The laboratory, vessel owner/manager and the Class Society verifying the IHM should remain independent of one another. See also section 3.1 on hazmat experts and independence.

# 2. Processes for Maintaining the IHM Part 1

Implementing logical and practical processes for maintaining Part 1 of the IHM properly should ensure that the company maintains compliance with the EU SRR and HKC requirements during the lifetime of the vessel but they can also help minimise the administrative burden on the ship and shore staff.

The EU SRR states that the IHM should be properly maintained and updated throughout the operational life of the ship. EMSA's IHM Guidance also provides useful information on establishing a life-cycle process for the maintenance of the IHM, stating that the *"IHM should be updated according to … the relevant provisions of the IMO guidelines and that respective changes to the IHM should be made accordingly and all the relevant documentation (e.g. Material Declaration (MD) and Supplier's Declaration of Conformity (SDoC) in case of machinery or equipment is added or sampling reports in case of random sampling) should be collected and maintained…"*. If adequate documentation is not available during the operation of the vessel, EMSA recommends sampling during maintenance. This is also recommended by many Class Societies.

A generic example of a process that moves on from the initial development stage and into the ongoing maintenance stage is offered in Figure 2.

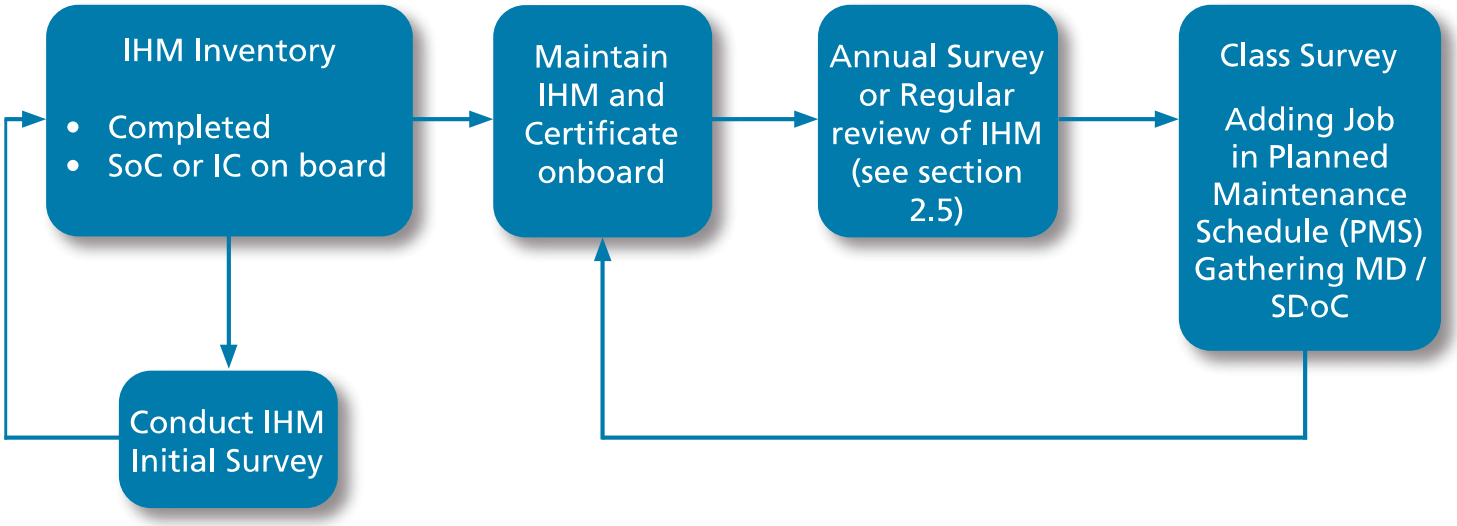



**Figure 2. Example process for maintaining the IHM**

Based on the example in Figure 2 the following two management systems will need to be updated in order to take into account the suggested processes offered below:

1. Purchase / Procurement management system and;
2. Repair and maintenance management system.

Together with these two management systems, the responsibilities for the task of maintaining the IHM will also have to be communicated to several departments within the company such as the fleet management and support, HSEQ, newbuilding and technical, and procurement departments.

### 2.1 Obtaining the Material Declarations (MDs) and Supplier's Declaration of Conformity (SDoC)

Ultimately it is the supplier that has the responsibility to provide the MD and SDoC but as part of the ongoing maintenance of the IHM, the role of obtaining the MD and the SDoC from the supplier will rest with the procurement department. This will apply during the development of the IHM as well as during its maintenance when new parts are ordered and installed and when suppliers change over time.

One of the most effective means of ensuring suppliers provide the relevant MD and SDoC is to include this requirement in the supplier's Terms and Conditions. Any such contractual clause should cross reference the need for the information provided by the supplier to meet the requirements of both the EU SRR and the HKC (and their respective guidelines). This can help avoid the purchase and delivery of parts without MDs and SDoCs and consequently avoid lengthy sampling and testing by the Company to determine the hazardous materials profile of the parts. A sample clause is provided in the box overleaf.

**Sample Procurement Clause**

*In order to comply with IMO's Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 (HKC) and its guidelines through the provisions of MEPC.269(58), as well as the European Union's Ship Recycling Regulation (EUSRR) No. 1257/2016,* [insert supplier/contractor name] *will submit a Material Declaration (MD) and Supplier's Declaration of Conformity (SDoC) either together with each delivery or as a general declaration covering all Supplier's Goods. The MD and SDoC should:*

*i. be provided in the format suggested in MEPC Resolution 269(68);*

*ii. contain as a minimum the information required in MEPC Resolution 269(68), and;*

*iii. verify that the products supplied have been assessed for the hazards listed in Appendix I and II of the HKC and Annex I and II of the EU SRR.*

*The MD and SDoC should be supplied in PDF format and sent to* [insert company's procurement contact].

The company should ensure the adequacy of the MD and SDoC supplied by the manufacturer. Noting the above sample procurement clause, the adequacy of the MD and SDoC can be determined by reviewing the information provided by the supplier, which, as a minimum, should contain the information in MEPC Resolution 269(68) – *Guidelines for the Development of the IHM.* This minimum list of information is provided in Table 1, opposite, with additional recommended information included in *Italics*. Note that a recommended standard format for these two documents is available in annexes 6 and 7 of the IMO Guidelines. The use of a standard format is also reflected in 'i' of the above sample clause.

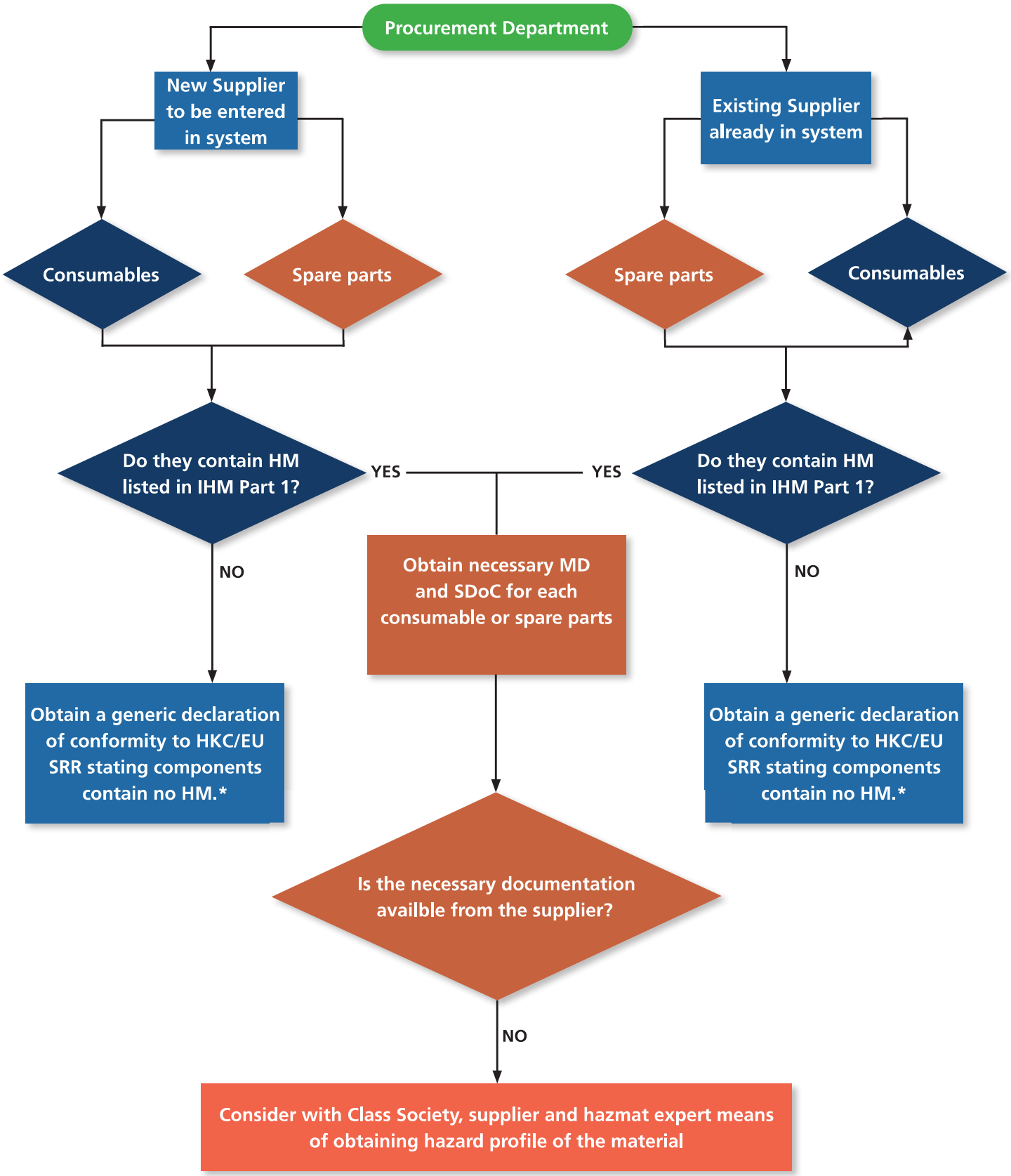
| Material Declaration | Supplier's Declaration of Conformity |
|---|---|
| **1.** *Supplier (respondent) information: Name, address, contact person, telephone numbers and e-mail address;*<br>**2.** date of declaration;<br>**3.** Material Declaration identification number;<br>**4.** supplier's name;<br>**5.** product name (common product name or name used by manufacturer);<br>**6.** product number (for identification by manufacturer);<br>**7.** declaration of whether or not the materials listed in the IHM Part 1 are present in the product above the threshold value stipulated in the IMO Guidelines; and<br>**8.** mass of each constituent material listed in the IHM Part 1 if present above threshold value.<br>**9.** *Material information:*<br>***i.*** *Unit: It has to be stated which unit (e.g. 1 piece, kg, m, $m^2$ or $m^3$) of the mentioned product contains the amount of hazardous materials provided .*<br>***ii.*** *Mass: mass of the homogeneous part or homogeneous product containing a hazardous material above the threshold level.*<br>***iii.*** *Unit: dimension of the given mass (e.g. gram, kilogram).*<br>***iv.*** *Parts of use: where exactly the hazardous material is used and/or additional information to be helpful.* | **1.** *Supplier (respondent) information: Name, address, contact person, telephone numbers and e-mail address;*<br>**2.** unique identification number;<br>**3.** name and contact address of the issuer;<br>**4.** identification of the subject of the Declaration of Conformity (e.g. name, type, model number, and/or other relevant supplementary information);<br>**5.** statement of conformity; e.g. Statement as to whether the hazardous material is present above or below the threshold level.<br>**6.** date and place of issue; and<br>**7.** signature (or equivalent sign of validation), name and function of the authorized person(s) acting on behalf of the issuer.<br>**8.** *Material information:*<br>***i.*** *Unit: It has to be stated which unit (e.g. 1 piece, kg, m, $m^2$ or $m^3$) of the mentioned product contains the amount of hazardous materials provided.*<br>***ii.*** *Mass: mass of the homogeneous part or homogeneous product containing a hazardous material above the threshold level.*<br>***iii.*** *Unit: dimension of the given mass (e.g. gram, kilogram).*<br>***iv.*** *Parts of use: where exactly the hazardous material is used and/or additional information to be helpful* |

**Table 1. Information to be included in the Material Declaration and Supplier's Declaration of Conformity.**

In the absence of formal guidance offered by the IMO or EMSA, the question relating to whether a separate MD for each and every part is required or whether a single MD for a range of parts will suffice is one that will have to be decided in consultation with the Administration and Class Society during the IHM development process. As this is also a challenge for suppliers as well, then it may be beneficial to establish an exchange between the Administration, Class Society and supplier regarding any generic MDs being considered for the same 'family' of products (e.g. a set range of serial numbers for the same part may use the same MD). It is interesting to note that experience gathered to date suggests that most Class Societies and Administrations will accept materials of the same or similar composition to be grouped together under a single MD.

A further common question relates to updating the IHM when identical spare parts or consumables are used. Section 4.3.2 of the IMO Guideline is clear on this point, stating that, *updating the IHM Part 1 is not necessary if identical parts or coatings are installed or applied.* However, a note in the maintenance log (see section 3.2) and IHM should be made in order to link the date of supply and the item with the existing MD. To add clarity, an MD may be tagged 'historic' or 'actual' depending on whether it was provided with a previous identical spare part or the actual spare part used respectively. A similar process may be considered when replacing identical spare parts that do not have MDs but samples have been taken and tested for inclusion in the IHM.

As noted previously, it is the responsibility of the supplier to provide the MD and SDoC. However, there are still occasions when MDs and SDoCs are not provided or available. If the supplier is unable to provide the MD or SDoC then consideration needs to be given as to how best to establish the hazardous materials profile of the items.




* EMSA's IHM Guidelines go as far as suggesting that *"suppliers should provide their customers with Supplier's Declarations of Conformity and Material Declarations…even when no HM are contained above the applicable threshold values."*

**Figure 3. Example IHM Inventory Process: Obtaining the Material Declaration and Suppliers Declaration of Conformity from the Supplier**

## 2.2 Requisition of spare parts

The following example process focuses on ensuring the necessary information is provided when spare parts that may contain materials identified in the IHM Part 1 are requested by the ship, Figure 4.

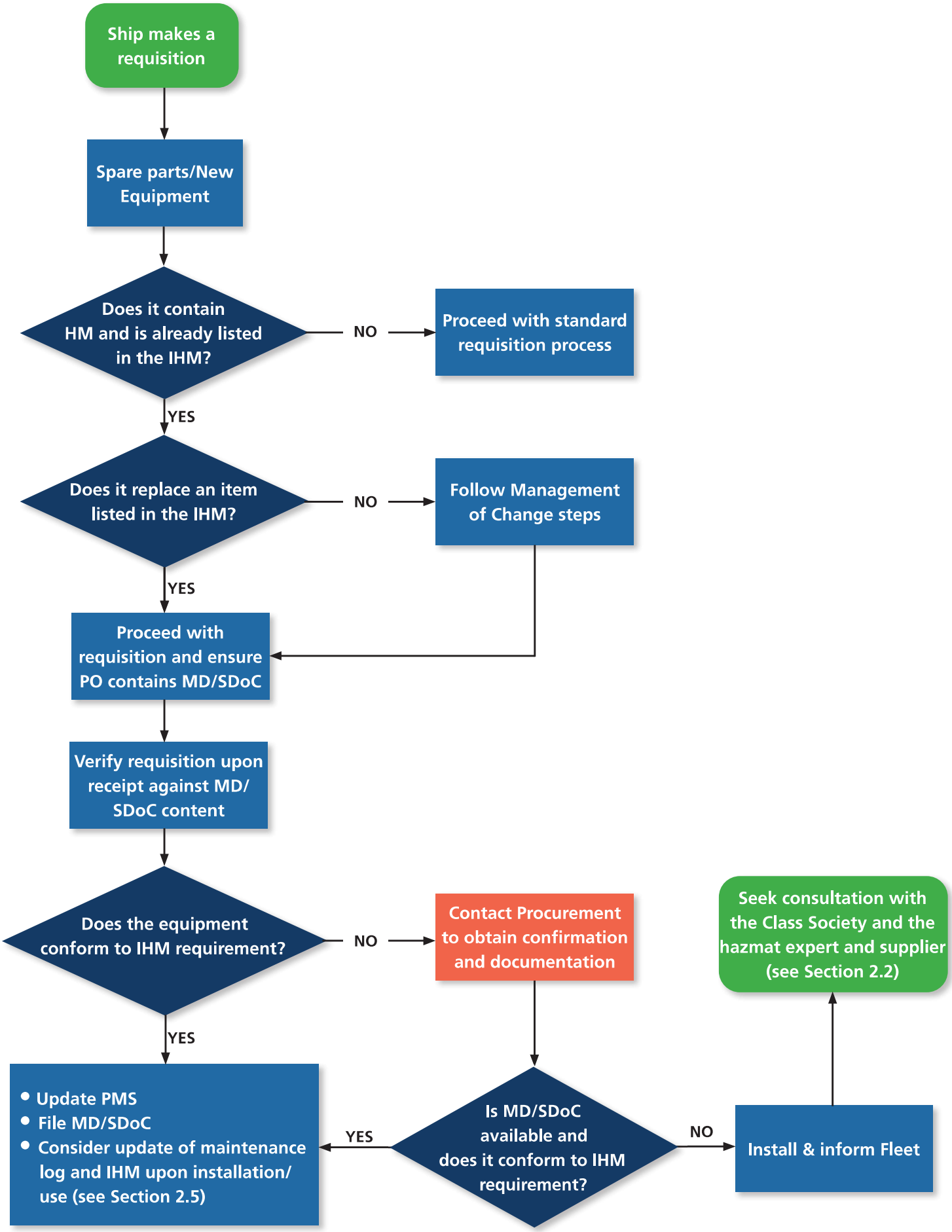



Figure 4. Example IHM Inventory Process: Requisition Process for Spare Parts

### 2.3 Onboard Process for checking the IHM and the spare parts / supplies on board

A process for ensuring that the IHM kept on board is adequately maintained should be developed. The process will ensure that the Master[1] confirms with the designated person (see section 2.4) that all items that have been fitted (installed) or used on board and that have materials included in the IHM Part 1 are reflected accurately in the IHM.

The details (frequency of updating the IHM, means and format for logging spare parts and consumables and designating company personnel) for establishing a company's process and procedures for maintaining the IHM are not defined in the IMO or EU SRR guidelines. As such, it will be up to each company to establish the process and procedures to fit with their current management systems. When developing the process, the company should bear in mind that the implementation of an onboard process for updating the IHM Part 1 forms part of the IHM Certificate and will likely be checked along with the Certificate by port State authorities. However, any such check should be limited to reviewing the presence and implementation of the process rather than an assessment of the content of the process and any associated procedures.

The European Maritime Safety Agency (EMSA) guidance on inspecting ships by port State authorities advises that a port State inspector should first and foremost look to the Statement of Compliance (SoC) when reviewing the IHM. However, inspectors should also ensure that there is an ***onboard procedure*** *for updating the IHM. Penalties will be issued if a ship is found with a non-updated IHM and/or there is* ***no implementation of a procedure*** *on board the ship for maintaining the inventory.* As such, it will be important to be able to document the management system and ensure quality controls are in place that will ensure the credibility of the IHM processes.

### 2.4 Designated person for maintaining the IHM

The HKC, EU SRR and their associated guidelines are not specific as to whether the designated person should be onboard or ashore, nor do the guidelines make any recommendation as to which staff, if onboard, should take on this responsibility. It is therefore up to the company to define the responsibilities and determine the designated person(s) (either onboard or ashore) and have this reflected in the IHM. As a minimum, the IMO Guidance (MEPC.269(68)) states:

Quote

***5.2 Operational stage***

*Shipowners should implement the following measures in order to ensure the conformity of part I of the Inventory:*

1. *to designate a person as responsible for maintaining and updating the Inventory (the designated person may be employed ashore or on board);*
2. *the designated person, in order to implement paragraph 4.3.2, should establish and supervise a system to ensure the necessary updating of the Inventory in the event of new installation;*
3. *to maintain the Inventory including dates of changes or new deleted entries and the signature of the designated person; and*
4. *to provide related documents as required for the survey or sale of the ship.*

Unquote

[1] Contingent on the company's procedures.

The EMSA IHM Guidance advises that *the duties of the designated person should be incorporated in the shipowner's quality management system and should be clearly described in writing taking into account that keeping an updated IHM may be a simplified process but it might also become quite demanding e.g. if a major conversion or extensive repair works are undertaken.*

The EMSA IHM Guidance refers to **training** only in relation to those experts developing the IHM and the necessary qualifications required of an IHM hazmat expert (section 4.3 of the EMSA IHM Guidelines). It is therefore anticipated that any EU PSC inspector will review the Master's or responsible person's onboard understanding of the process for maintaining the IHM taking into account the statutory nature of this certification and the safety hazards which might be associated with the improper handling of hazardous material.

While there is no requirement for training the crew with regard to the maintenance of the IHM, it has been observed that some Administrations are requiring crew training to ensure an understanding of the IHM and the hazardous materials onboard.

Some third-party hazmat contractors are offering their services during the IHM maintenance process. If an external contractor is used for maintaining the IHM as an ongoing function, then this should be clearly defined in the maintenance procedures, together with the frequency of reviewing the IHM. As with the development of the IHM, the hazmat expert used needs to be fully independent of the verifying and approval authority.

## 2.5 Regular review of the IHM

The EU SRR and HKC require updates to be made to the IHM Part 1 only when spare parts and consumables are fitted, installed or used. MDs and SDoCs are therefore not required to be reflected in the IHM Part 1 for spares and consumables that have not yet been fitted or installed. Details regarding spares and consumables kept on board would only be captured at the end of a vessel's life in Part 3 of the IHM. However, some companies have chosen to implement a process that brings forward the step for updating the IHM Part 1 in order to prevent items being delivered or kept onboard that do not have MDs or SDoCs. Obtaining and logging this documentation when the item is placed onboard may assist in preventing delays in the installation and use of spare parts and facilitate the timely updating of the IHM once the item has been fitted. Avoiding spares being delivered onboard without the necessary documentation will also relieve pressure on the crew when priority should be given to the task of replacing the part before completing the necessary IHM related paperwork. See Figure 4 for an associated process map.

It is useful to note that there is no requirement in either the HKC nor the EU SRR to keep copies of the MD and SDoC onboard. However, some apps and PMS software platforms allow these documents to be accessed onboard and could therefore be referred to by the ship's staff during a PSC inspection.

Access to the MD and SDoC will however be required during the 'renewal' and any 'additional' surveys by Class. The latter will be contingent on whether an additional survey was requested by the owner as part of the ship's annual survey. As per the HKC and EU SRR, an annual survey is not required on a mandatory basis. Any additional surveys are optional and at the discretion of the ship owner. If this additional survey is performed then it, *should verify that Part I of the Inventory of Hazardous Materials is properly maintained and updated to reflect changes in ship structure and equipment, by checking Material Declaration and Supplier's Declaration of Conformity.* Some owners may use a single Class Society irrespective of the Class that each vessel is registered with to approve the IHMs. In this case, the SoC may not be verified annually but every five years. Owing to the fact that some Administrations require the vessel's Class Society to verify the IHM, consultation with the Administration is recommended if a different Class Society is being considered for the IHM.

A manageable and practical **frequency** for updating the IHM should be defined in the Company's maintenance procedure. This should take into account the periodicity of the agreed Class surveys and audits as well as the probability of periodic reviews by PSC inspectors.

# 3. Additional considerations

This document only provides generic examples on the processes for developing and maintaining the IHM Part 1. However, there are several elements that should be considered in further detail by a company embarking on the necessary work for compliance with the EU SRR and HKC.

### 3.1 IHM Maintenance Log

As noted above in regards to the onboard procedure, the maintenance log will form a key part of the procedure for maintaining the IHM and consequently provides evidence that the IHM is being adequately updated. The maintenance log should therefore have the SoC reference included clearly so any cross reference between the SoC and the log can be easily identified.

There is no established, uniform or standardised format for an IHM maintenance log but an example of how such a log could be set-up is provided in the annex. For simplicity, the example largely follows the format of the IHM itself and the model provided in Appendix II of the IMO's IHM Guidelines.

Additional information such as the date of purchase, installation, delivery and replacement of the spare parts or consumables may be added to the maintained log to provide greater historical maintenance information. For consistency and clarity, the location of the HMs in the log should coincide with the General Arrangements Plan with standard units (grams and kilograms or m3 for liquids and gases) for estimated quantities.

### 3.2 Use of software for maintaining the IHM Part 1

To help maintain IHMs, software and apps are being developed by various Class Societies and suppliers which assist both those on board as well as the office (Technical/PMS and Procurement systems) keep track of equipment and materials as required to be included in the IHM. Some Class Societies also offer editable PDFs for the same purpose. If such software is used the company should ensure that it allows for the attachment of documents so that that equipment supplier's MDs and SDoCs can easily accompany an entry. Preferably, the software should also be linked to the PMS software or module or even have the PMS upgraded to undertake the necessary updates automatically in the IHM.

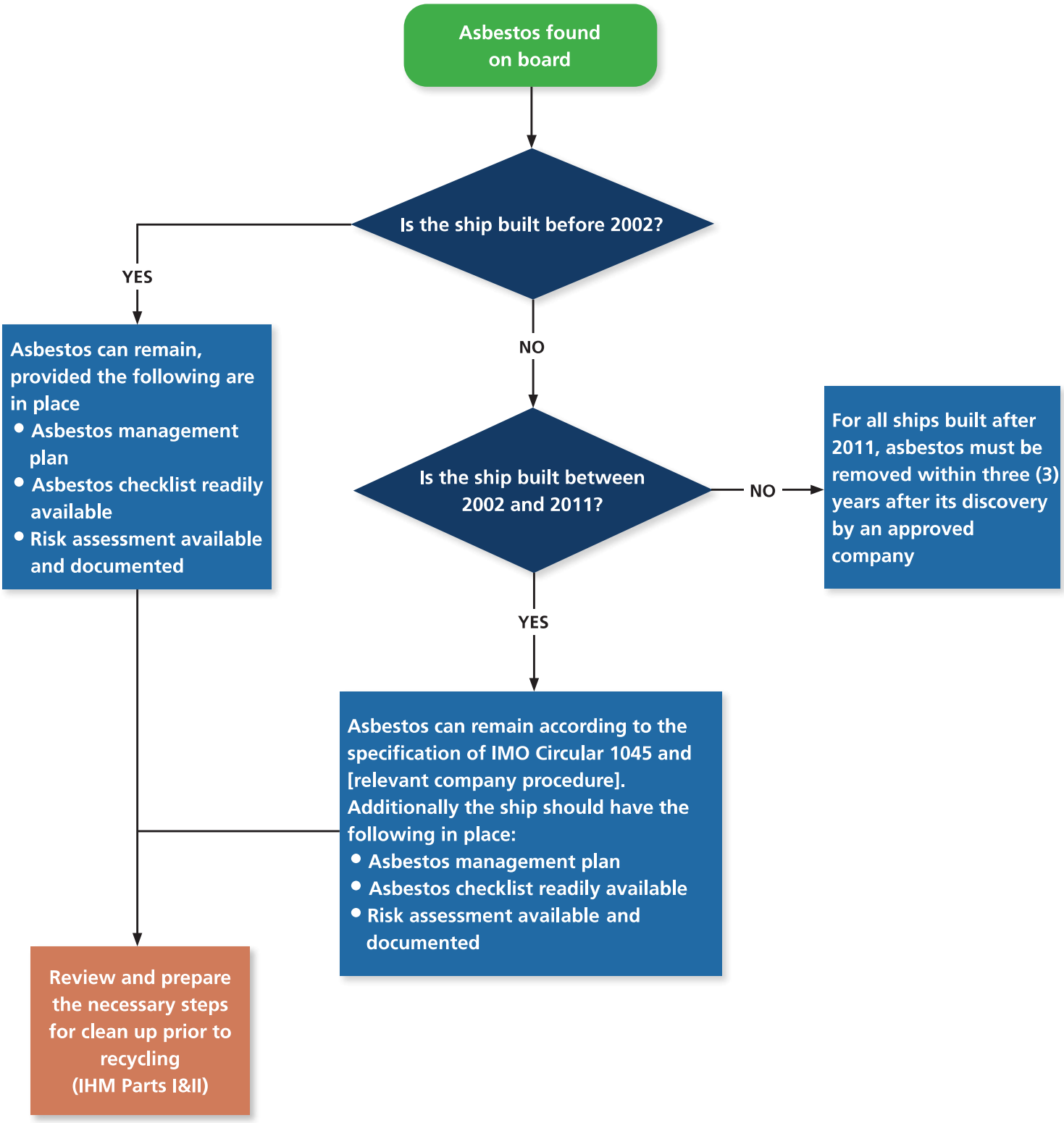
Whichever method is used to maintain the IHM it is important to ensure that during audits and inspections it is easy to demonstrate, that the IHM is being maintained. In addition, internal audits should also be amended to take into account updates to the IHM. Vessel management hand-over check lists should also include the IHM and an audit of whether the IHM for the vessel being delivered into the company was included and had been adequately updated.

### 3.3 Asbestos management procedures

Some companies have introduced asbestos management plans onboard in the event that asbestos is found during the IHM development process and its associated onboard inspections and sampling. Finding asbestos onboard will present a crew health risk, until it is removed/safely managed. As per MSC.1/Circ.1374, *when asbestos is detected on board, in contravention of SOLAS regulation II-1/3-5, action should be taken to have it removed. The removal – assigned to professional asbestos removal companies – should take place within a time frame of 3 years from the date when the contravention is found and should be conducted in close consultation with and, where applicable, under the supervision of the flag State concerned. In such cases, a suitable exemption certificate should be issued by the flag State.*

An example procedure for the management of asbestos, if found on board, is provided in Figure 5. Please also refer to INTERTANKO's Asbestos Management guidelines for additional guidance on asbestos management.

**Figure 5. Example process in the event that asbestos is found on board.**



## References


1. European Union Regulation (EU) 1257/2013 on ship recycling.

2. Guidance on hazardous materials management; asbestos containing materials (ACMs), INTERTANKO, 2014.

3. Guidance on inspections of ships by the port States in accordance with Regulation (EU) 1257/2013 on ship recycling Inspections from the EU port States to enforce provisions of the ship recycling Regulation, EMSA, 2019.

4. Guidance on the Inventory of Hazardous Materials, IHM Development and Maintenance in the context of the EU Ship Recycling regulation, EMSA, 2017.

5. Guidelines for the development of the Inventory of Hazardous Materials, Resolution MEPC.269(68), IMO, 2015.

6. Guidelines for the inspection of ships under the Hong Kong Convention, Resolution MEPC.223(64), IMO, 2012.

7. Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, IMO, 2009.

8. MSC.1/Circ.1374 - Information on Prohibiting the Use of Asbestos on Board Ships, IMO, 2010.

9. Shipping Industry Guidelines on Transitional Measures for Shipowners Selling Ships for Recycling In Preparation for the entry into force of the IMO Hong Kong Convention and the EU Ship Recycling Regulation, Second Edition 2016.

## Example IHM Maintenance Log

Ship's Name: IMO No:

Changes to Paints and Coating Systems containing materials listed in Table A and Table B of Appendix 1 of Resolution MEPC.269(68)

| IHM item no. replaced / deleted* | Application of paint | Name of paint | Location | Materials (classification in appendix 1) | Approx. quantity | Date of change | Signature of Designated Person | Remarks |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

Changes to Equipment and Machinery containing materials listed in Table A and Table B of Appendix 1 of Resolution MEPC.269(68)

| IHM item no. replaced / deleted* | Name of equipment and machinery | Location | Materials (classification in appendix 1) | Parts where used | Approx. quantity | Date of change | Signature of Designated Person | Remarks |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

Changes to Structure and Hull containing materials listed in Table A and Table B of appendix 1 of Resolution MEPC.269(68)

| IHM item no. replaced / deleted* | Name of structural element | Location | Materials (classification in appendix 1) | Parts where used | Approx. quantity | Date of change | Signature of Designated Person | Remarks |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

If the new item is additional to the IHM and does not replace any existing item enter N/A in this column.

**INTERTANKO London**
St Clare House
30-33 Minories
London EC3N 1DD
United Kingdom
Tel: +44 20 7977 7010
Fax:+44 20 7977 7011
london@intertanko.com

**INTERTANKO Oslo**
Nedre Vollgate 4
5th floor
PO Box 761 Sentrum
N-0106 Oslo
Norway
Tel: +47 22 12 26 40
oslo@intertanko.com

**INTERTANKO Asia**
70 Shenton Way
#20-04 Eon Shenton
079118
Singapore
Tel: +65 6333 4007
Fax: +65 6333 5004
singapore@intertanko.com

**INTERTANKO North America**
801 North Quincy Street – Suite 500
Arlington, VA 22203
USA
Tel: +1 703 373 2269
Fax:+1 703 841 0389
washington@intertanko.com

**INTERTANKO Athens**
Karagiorgi Servias 2
Syntagma
Athens 10 562
Greece
Tel: +30 210 373 1772/1775
athens@intertanko.com


www.intertanko.com

INTERTANKO