

IMO Frequently Asked Questions

Implementing the Hong Kong Convention

The Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009, will enter into force globally on 26 June 2025.

The International Maritime Organization (IMO) responds below to frequently asked questions about the Hong Kong Convention and its guidance, and what the entry into force means for international shipping and ship recycling.

What is the Hong Kong Convention (HKC)?

The Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009, (the **HKC** or **Convention**) is a treaty adopted by the International Maritime Organization (**IMO**) in order to ensure that ships, when being recycled after reaching the end of their operational lives, do not pose any unnecessary risks to human health, safety and to the environment. The HKC was adopted at a diplomatic conference held in Hong Kong, China, from 11 to 15 May 2009 and will enter into force on 26 June 2025. The entry-into-force date was set in June 2023 when all required criteria were met:

- .1 not less than 15 States;
- .2 not less than 40% of the world's merchant shipping by gross tonnage; and
- .3 ship recycling capacity of not less than 3% of the gross tonnage of the combined merchant shipping of those States mentioned above.

IMO is the United Nations specialized agency responsible for developing global standards for ship safety and security and for protecting the marine environment and the atmosphere from any harmful impacts of shipping.

When will the HKC enter into force?

The Convention will enter into force globally on 26 June 2025.

How many countries have signed up to the HKC?

As of September 2024, the treaty has been ratified by 24 countries representing 57.73% of the world fleet.

What key aspects does the HKC intend to address?

Key aspects include:

- .1 **Ship Recycling Facility operations:** The Convention sets out requirements for Ship Recycling Facilities to ensure they operate safely and without harming the environment. Facilities must prepare a Ship Recycling Facility Plan (SRFP), in accordance with the Guidelines for safe and environmentally sound ship recycling (resolution MEPC.210(63)), including, inter alia, details of:
 - .1 prevention of adverse effects to human health and the environment;
 - .2 Safe and environmentally sound management of hazardous materials;
 - .3 Emergency preparedness and response;
 - .4 Worker safety and training; and
 - .5 Reporting on incidents, accidents, occupational diseases and chronic effects.

- .2 **The Inventory of Hazardous Materials (IHM):** Ships must maintain a detailed inventory of hazardous materials (IHM), for new ships from 26 June 2025 and for existing ships no later than 26 June 2030 or prior to being recycled if this is earlier, taking into account 2023 Guidelines for the development of the Inventory of the Hazardous Materials (resolution MEPC.223(64)).

The IHM helps identify and manage risks during operations and during the actual recycling process and must be verified by the Administration or by its recognized organization.

The IHM consists of:

 - .1 part I - hazardous materials contained in the ship's structure and equipment;
 - .2 part II - operationally-generated waste;
 - .3 part III – stores.

Parts II and III of the IHM must be prepared prior to the ship's being recycled.

- .3 **Safety and Environmental Protection:** The Convention embraces the “cradle to grave” concept for the purpose of addressing all environmental and safety aspects relating to ship recycling, taking them into account from the ship design stage onwards and right through to the end of the ship’s life, and including also the responsible management and disposal of associated waste streams in a safe and environmentally sound manner. Furthermore, the Convention establishes guidelines and procedures to protect human health and the environment from the dangers posed by toxic materials found in ships, such as asbestos, heavy metals, and other hazardous substances.

- .4 **Certification and Compliance:** The Convention ensures, via the schemes of surveys, certification, verification and inspection of port State control, that ships and ship recycling facilities comply with the requirements of the Convention.

Which key stakeholders are involved in the HKC?

Numerous stakeholders have responsibilities under the Hong Kong Convention, including, inter alia, the following:

- .1 shipbuilders
- .2 shipowners
- .3 supply chain to the maritime industry
- .4 ship recycling facilities
- .5 National Authorities (Competent Authorities and Administration)
- .6 Recognized Organizations
- .7 Port State Control Officers

To support these stakeholders, the IMO's Marine Environment Protection Committee (**MEPC**) has developed and adopted six sets of guidelines to assist in the implementation and enforcement of the Convention's technical standards.

What is the available IMO guidance for the HKC?

Since the adoption of the Convention, MEPC has developed and adopted the following guidelines to assist States in the implementation and enforcement of the Convention's technical standards:

- .1 2011 Guidelines for the Development of the Ship Recycling Plan (resolution [MEPC.196\(62\)](#));
- .2 2012 Guidelines for Safe and Environmentally Sound Ship Recycling (resolution [MEPC.210\(63\)](#));
- .3 2012 Guidelines for the Authorization of Ship Recycling Facilities (resolution [MEPC.211\(63\)](#));
- .4 2012 Guidelines for the survey and certification of ships under the Hong Kong Convention (resolution [MEPC.222\(64\)](#));
- .5 2012 Guidelines for the inspection of ships under the Hong Kong Convention (resolution [MEPC.223\(64\)](#)); and
- .6 2023 Guidelines for the development of the Inventory of the Hazardous Materials (resolution [MEPC.379\(80\)](#)).

What is the schedule for the implementation of the HKC?

There are different requirements for new ships, existing ships, ships destined to be recycled, and for ship recycling facilities.

From 26 June 2025:

- .1 **New ships** must have an International Certificate on Inventory of Hazardous Materials;
- .2 **All ships going for recycling (new and existing ships)** must have an International Ready for Recycling Certificate;
- .3 **Ship Recycling Facilities** must have a Document of Authorization to conduct Ship Recycling (DASR).

From 26 June 2030 or before ships' going for recycling if this is earlier:

- **existing ships** must have an International Certificate on Inventory of Hazardous Materials.

Forms for all these certificates can be found in the appendices of the Convention.

Clearly, this can create a backlog if existing ship compliance is left until June 2030. However, the Convention is intended to be harmonized with other statutory surveys. Furthermore, flag States and class societies are expected to introduce their own phase-in requirements to avoid such a backlog.

Which ships does the HKC apply to?

A 'Ship is defined as follows:

"Ship means a vessel of any type whatsoever operating or having operated in the marine environment and includes submersibles, floating craft, floating platforms, self-elevating platforms, Floating Storage Units (FSUs), and Floating Production Storage and Offloading Units (FPSOs), including a vessel stripped of equipment or being towed."

This is a very broad definition, covering a wide variety of vessels. It can also be seen not to be 'time constrained'. Once a vessel has been used as a 'ship', even for a very short time, it is always considered a 'ship' under the HKC.

The Convention applies to all ships entitled to fly the flag of a Party to the Convention, with the exception of ships of less than 500 GT, ships operating throughout their lives only in waters subject to the jurisdiction of a Party of warships, and naval auxiliaries or other ships operated by a Party used on government non-commercial service.

For ships that are not within the scope of the Convention, each Party shall ensure, by the adoption of appropriate measures not impairing operations or operational capabilities of such ships owned or operated by it, that such ships act in a manner consistent with the Convention, so far as is reasonable and practicable.

What will ships need to do, when the HKC is in force?

The HKC establishes key responsibilities for ships and shipowners during operations, and to ensure safe and sustainable ship recycling at the end of the ship's working life. The main requirements for ships are:

- .1 *Inventory of Hazardous Materials (IHM)*: Shipowners are required to prepare and maintain an Inventory of Hazardous Materials for each ship. This document must detail all hazardous materials present on board, including their location and quantity.
- .2 *Safe and Environmentally Sound Ship Recycling*: Ships flying the flag of a party to the Convention can only be dismantled at authorised Ship Recycling Facilities that comply with the standards set forth in the Convention, which include safe working conditions and environmental protections.
- .3 *Ship Recycling Plans*: Prior to the recycling of a ship, shipowners must provide their authorised ship recycling facility with a completed IHM in order that a ship-specific Ship Recycling Plan can be prepared.
- .4 *Documentation and Certification*: Shipowners are responsible for providing the necessary documentation and certification to demonstrate compliance with recycling standards and to facilitate inspections by relevant authorities.
- .5 *Implementation of Procedures*: Shipowners should establish and implement management procedures to ensure compliance with the requirements of the Convention throughout the ship's lifecycle, including during dismantling.
- .6 *Cooperation with Authorities*: Shipowners have to cooperate with relevant authorities and provide any information necessary for inspections and other regulatory procedures.
- .7 *Compliance with Reporting Requirements*: Shipowners must complete and submit the required reports and documentation regarding the hazardous materials found on their vessels as part of ongoing compliance with the Convention.

What specific surveys will ships be subject to, when the HKC is in force?

IHM Part I¹ surveys and certification (throughout the operational life of the ship)

Ships will be subject to:

- .1 an initial survey before the ship is put in service or, for existing ships, before the International Certificate on Inventory of Hazardous Materials is issued;
- .2 a renewal survey at intervals specified by the Administration, but not exceeding five years; and
- .3 an additional survey may be made at the request of the shipowner after a change, replacement, or significant repair of the structure, equipment, systems, fittings, arrangements and material.

¹ Part I of the IHM (hazardous materials contained in the ship's structure and equipment)

Ready for Recycling surveys and certification (prior to recycling)

Once a decision has been taken to recycle the ship, a final survey will be required, prior to the ship being taken out of service and before the recycling of the ship has started.

The final survey will verify that:

- .1 the IHM (Parts I, II and III)² is in accordance with the requirements of the Convention;
- .2 the Ship Recycling Plan properly reflects the information contained in the IHM, and contains information concerning the establishment, maintenance and monitoring of Safe-for-entry and Safe-for-hot work conditions;
- .3 the Ship Recycling Plan has been either explicitly or tacitly approved by the Competent Authority authorizing the ship recycling facility;
- .4 the Ship Recycling Facility(ies) where the ship is to be recycled holds valid authorization in the form of a Document of Authorisation to Conduct Ship Recycling (**DASR**)

An International Ready for Recycling Certificate will be issued for a period specified by the Administration that shall not exceed three months.

How will a ship's compliance be checked?

Ships may be subject to the inspection of Port State Control in any port or offshore terminal of another Party to the Hong Kong Convention. This inspection may include verifying that there is onboard a valid International Certificate on Inventory of Hazardous Materials or, if the ship is scheduled to be recycled, an International Ready for Recycling Certificate.

However, all possible efforts must be made to avoid a ship being unduly detained or delayed.

What is expected of Port State Control?

For initial inspections, the port State control officer (**PSCO**) should verify that there is onboard the International Certificate on Inventory of Hazardous Materials or the International Ready for Recycling Certificate, both supplemented by the Inventory of Hazardous Materials (**IHM**), and examine reports from previous port State control inspections.

The PSCO should confirm that certificates are properly completed and signed, that the required surveys have been performed, and that the identification details on the IHM correspond to the certificate.

If these are valid and appropriate, and if the PSCO's general impressions and visual observations onboard confirm compliance with the Convention, the PSCO should generally confine the inspection to any reported deficiencies.

² Part II of the IHM (operationally-generated waste); Part III of the IHM (Stores)

The PSCO may proceed to a more detailed inspection if there are clear grounds for this, such as:

- .1 evidence that a required certificate is missing or clearly invalid;
- .2 evidence that the IHM is missing or clearly invalid;
- .3 the absence of structure or equipment identified in the part I of the IHM;
- .4 the absence of an entry in part I of the IHM for structure or equipment that the PSCO believes to contain hazardous materials listed in appendices 1 or 2 to the Convention; and
- .5 no evidence of implementation of procedures on board the ship for maintaining part I of the IHM.

A more detailed inspection should be limited to verifying that controls of hazardous materials in appendix 1 are effectively implemented. Failure to update the IHM should not constitute a detainable deficiency but any inconsistencies in the IHM should be reported to the ship's flag and be redressed at the time of the next survey.

What deficiencies will be detainable under the HKC?

In exercising its functions, the PSCO should use professional judgment to determine whether to detain a ship until any noted deficiencies are corrected or to allow it to sail with certain deficiencies that do not pose an unreasonable threat to the safe and environmentally sound recycling of ships. In doing so, the PSCO should be guided by the principles and requirements of the Convention.

To assist the PSCO in assessing whether to detain a ship, the following deficiencies are considered to be of such a serious nature that may warrant the detention of the ship involved:

- .1 failure to carry onboard a valid International Certificate on Inventory of Hazardous Materials, or, if appropriate, a valid International Ready for Recycling Certificate
- .2 non-compliance with the control measures for hazardous materials listed in appendix 1 of the Convention

What about ships registered under a flag which hasn't ratified the HKC?

Such ships must not be issued with the relevant certificates. However, port States which are Parties will expect the ships to comply with the requirements of the Convention, so as to ensure no more favourable treatment is given to such ships.

How will non-Party ships be inspected under the HKC?

Non-Party ships are not entitled to be issued with either an International Certificate on Inventory of Hazardous Materials or an International Ready for Recycling Certificate. Therefore, the PSCO should ask for documentation that contains the same information as in the aforementioned certificates supplemented by an IHM.

No more favourable treatment should be applied to ships of non-Parties to the Convention.

Can ships which fly the flag of a Party to the HKC be recycled in a Ship Recycling Facility under the jurisdiction of a government which is not a Party to the Convention?

No. Regulation 8 of the Convention is clear that such ships can only be recycled at Ship Recycling Facilities which are authorised in accordance with the HKC.

What is the definition of a Ship Recycling Facility under the HKC?

“Ship Recycling” means the activity of complete or partial dismantling of a ship at a Ship Recycling Facility in order to recover components and materials for reprocessing and re-use, whilst taking care of hazardous and other materials, and includes associated operations such as storage and treatment of components and materials on site, but not their further processing or disposal in separate facilities.

“Ship Recycling Facility” means a defined area that is a site, yard or facility used for the recycling of ships.

What about ship recycling facilities under the jurisdiction of a government which is not a Party to the HKC?

Such ship recycling facilities must not be issued with the relevant certificates. Ships which are registered under the flag of a Party to the Convention are not allowed to be recycled in these facilities.

Can Ship Recycling Facilities acting under the jurisdiction of a Party to the Hong Kong Convention recycle non-Party ships?

As per regulation 17 of the HKC, Ship Recycling Facilities may take non-Party ships provided that they meet the requirements of the Convention, i.e. they must have had the equivalent of an initial survey and a final survey and have documentation that is equivalent to an International Ready for Recycling Certificate (with supporting IHM Parts I, II and III properly completed along with other relevant documentation).

What will Ship Recycling Facilities need to do, when the HKC is in force?

From the date of entry into force, Ship Recycling Facilities operating within the jurisdiction of a Party to the Convention must be authorized by the Competent Authority(ies) of that Party. Each yard must prepare a Ship Recycling Facility Plan (**SRFP**), taking into account the relevant IMO guidelines, which addresses:

- .1 worker safety and training;
- .2 protection of human health and the environment;
- .3 roles and responsibilities of personnel;
- .4 emergency preparedness and response; and
- .5 monitoring, reporting and record-keeping systems.

Additionally, before a ship can be recycled, the Ship Recycling Facility must provide a Ship Recycling Plan (**SRP**) which is specific to each vessel that is to be recycled. It must specify the way an individual ship will be recycled, depending on its particulars and its inventory.

How will a Ship Recycling Facility's compliance be checked?

Each Party will establish legislation, regulations, standards and other mechanisms for authorizing Ship Recycling Facilities. Each Party shall designate one or more Competent Authorities for matters related to ship recycling.

The authorization will be carried out by the Competent Authority(ies) and shall include a verification of documents and a site inspection. A "Document of Authorization for Ship Recycling" (**DASR**) shall be issued and valid for not more than five years.

For the Ship Recycling Facilities authorized by a Party, such Party shall provide to the IMO, if requested, and to those Parties which request it, relevant information on which its decision for authorization was based.

What are the key requirements for National Authorities, under the HKC?

Controls on Ship Recycling Facilities

Each Party must establish legislation, regulations, and standards that are necessary to ensure that Facilities are designed, constructed, and operated in a safe and environmentally sound manner in accordance with the regulations of the Convention.

Each Party must establish a mechanism for authorizing Facilities with appropriate conditions to ensure that each facility meets the requirements of the Convention.

Each Party must establish a mechanism for ensuring that Facilities comply with requirements, including the establishment and effective use of inspection, monitoring and enforcement provisions, including powers of entry and sampling.

Authorization of Ship Recycling Facilities

Facilities will be authorized by a Party; authorization shall be carried out by the Competent Authority, including verification of documentation and a site inspection.

The key documentation to be used, in the first instance, will be the facility's Ship Recycling Facility Plan (**SRFP**), supplemented by supporting documentation.

The authorization shall be valid for a period specified by the Party but not exceeding five years.

The Party will identify the terms for which the authorization will be issued, withdrawn, suspended, amended and renewed, and communicate these terms to each Facility.

If incidents or actions taken at the Facility have the effect that the conditions for the authorization are no longer fulfilled, the Ship Recycling Facility must inform the Competent Authority. The Competent Authority may accordingly decide to suspend or withdraw the authorization or require corrective actions by the Ship Recycling Facility.

Approval of Ship Recycling Plans

The ship-specific Ship Recycling Plan (**SRP**) will be either explicitly or tacitly approved by the Competent Authority authorizing the facility.

The Competent Authority must send a written acknowledgement of receipt of the SRP to the ship recycling facility, the shipowner, and the Administration (flag) within three (3) working days of its receipt.

Thereafter:

- .1 where a Party requires explicit approval of the Ship Recycling Plan, the Competent Authority must send written notification of a decision to approve or deny the SRP to the Facility, shipowner and Administration
- .2 where a Party requires tacit approval of the Ship Recycling Plan, the acknowledgment of receipt will specify the end date of a 14-day review period

The Competent Authority will notify any written objection to the SRP to the Ship Recycling Facility, shipowner and Administration within this 14-day review period. Where no such written objection has been notified, the Ship Recycling Plan will be deemed to be approved.

What are the reporting requirements for National Authorities, under the HKC?

Each Party must report to the Organization the following information:

- .1 a list of Facilities authorized in accordance with the Convention and operating under the jurisdiction of that Party
- .2 contact details for the Competent Authority(ies), including a single contact point, for that Party
- .3 a list of the recognized organizations authorized to act on behalf of that Party in the administration of ship recycling matters in accordance with the Convention – and the specific responsibilities and conditions of the authority delegated to the recognized organizations

- .4 an annual list of ships flying the flag of that Party to which an International Ready for Recycling Certificate has been issued, including the name of the Recycling Company and location of the Facility
- .5 an annual list of ships recycled within the jurisdiction of that Party
- .6 information concerning violations of this Convention – and actions taken towards ships and Ship Recycling Facilities under the jurisdiction of that Party

The above information is intended to be recorded in a dedicated module within the Global Integrated Shipping Information System (GISIS), however the required module is not yet ready. In the interim period, as per MEPC.1/Circ.910 of 19 April 2024, Member States are requested to submit the information on ship recycling facilities and the two annual lists of ships required to be reported (.1, .4 and .5 above) via email to med@imo.org using the forms in parts 1, 4 and 5 of the annex to the Circular.

Will there be amendments to the HKC?

The Convention includes text specifying the amendment procedure for the HKC (article 18).

Amendments can only be proposed by States who are Party to the Convention and may be adopted only after the Convention has entered into force. Proposed amendments should be submitted to the Secretary-General who will circulate it to the members of the Organization; it shall then be referred to the Marine Environment Protection Committee (MEPC) for consideration.

How to deal with the issue of the interplay between the Hong Kong and the Basel Conventions with respect to the transboundary movement of ships intended for recycling?

MEPC 82 in October 2024 approved HKSRC.2/Circ.1 on Provisional Guidance on the implementation of the Hong Kong and Basel Conventions with respect to the transboundary movement of ships intended for recycling, which recommends:

Member States should take into account the following provisional guidance on the implementation of the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 (Hong Kong Convention) and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal (Basel Convention) with respect to the transboundary movement of ships intended for recycling:

- .1 States that are Parties to the Hong Kong Convention but are not Parties to the Basel Convention should apply the requirements of the Hong Kong Convention;
- .2 States that are Parties to the Basel Convention but are not Parties to the Hong Kong Convention should apply the requirements of the

Basel Convention, including its Ban Amendment, if they have expressed their consent to be bound by it; and

- .3 States that are Parties to both the Hong Kong Convention and the Basel Convention, including Parties that have expressed their consent to be bound by the Ban Amendment, with an understanding that the provisions of the Basel Convention should not affect the transboundary movements that take place pursuant to the Hong Kong Convention, should consider notifying the Secretariat of the Basel Convention as follows:

"In accordance with Article 11 of the Basel Convention, the Basel Convention Secretariat is hereby notified that [name of the State that is a Party to both the Hong Kong Convention and the Basel Convention] is a Party to the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 (Hong Kong Convention) and will apply the Hong Kong Convention's requirements in respect of transboundary movements of ships* intended to be recycled at a ship recycling facility that has been authorized in accordance with the Hong Kong Convention and is situated under the jurisdiction of a Party to the Hong Kong Convention.

Relevant arrangements have been made to ensure environmentally sound management of hazardous wastes and other wastes (arising from ship recycling) as required by the Basel Convention. Consequently, the provisions of the Basel Convention shall not affect transboundary movements which take place pursuant to the Hong Kong Convention."
