

VARUNA SENTINELS RESOURCE

# EU SRR vs Hong Kong Convention

Side-by-side comparison of the two ship recycling regimes governing IHM compliance for vessels of 500 GT and above

Edition: April 2026

# Why this matters

The Hong Kong Convention (HKC) entered into force on 26 June 2025 — globally binding for all ratifying flags. The EU Ship Recycling Regulation (EU SRR, 1257/2013) has been in force since 2013 for EU/EEA flags and EU port calls. The two regimes substantially overlap but are **not identical**. EU SRR adds substances, restricts approved facilities, and introduces criminal liability under Directive (EU) 2024/1203 by 21 May 2026.

**One certificate, dual compliance: EU Implementing Decision 2026/116 introduced a unified ICIHM format that satisfies both regimes — but the underlying IHM Part I content must still meet the broader EU substance list.**

Dimension	Hong Kong Convention (HKC)	EU Ship Recycling Regulation (EU SRR)
<b>Adopted</b>	15 May 2009 (Hong Kong, China)	20 November 2013 (Regulation 1257/2013)
<b>In force</b>	26 June 2025 (globally)	30 December 2013; fully applicable since 31 Dec 2018
<b>Geographic scope</b>	Ships flying flag of any ratifying State on international waters	EU/EEA-registered ships globally + non-EU ships at EU/EEA ports
<b>Tonnage threshold</b>	500 GT and above	500 GT and above
<b>Substance list</b>	Appendix 1 + Appendix 2 (asbestos, PCB, ODS, and 10 other listed substances)	HKC list plus additional substances: PFOS, brominated flame retardants, and 10 other listed substances
<b>IHM verification</b>	Recognised Organisation (typically IACS class) or State of flag	EU-specific verification by national authorities
<b>Approved recycling facilities</b>	Yards with Document of Authorization of Ship Recycling (DASR)	EU Ship Recycling Facilities List (15th edition Feb 2026)
<b>End-of-life certificate</b>	International Ready for Recycling Certificate (IRRC)	EU SRR update; unified format under Decision 2026/116
<b>Penalties</b>	Flag-State enforcement; PSC detention; loss of trade privileges	EU Member State penalties + Directive 2024/1203 criminal liability
<b>Continuous IHM maintenance</b>	Required throughout operational life	Required throughout operational life
<b>MEPC.405(83) cybutryne 200 mg/kg</b>	Yes — applies to MDs from 26 June 2025	Yes — applies via unified IMO regime

## Key 2026 deadlines at a glance

Date	Event	Impact
<b>1 January 2026</b>	PFOS firefighting foam ban (SOLAS Ch. II-2)	All ships — IHM Part I update needed for replaced foams
<b>19 January 2026</b>	EU Implementing Decision 2026/116 ICIHM format	EU/EEA flags — unified certificate
<b>26 February 2026</b>	HKC applies to existing Cyprus-flagged ships	Cyprus fleet — ICIHM at first harmonised renewal survey
<b>27 February 2026</b>	EU Ship Recycling Facilities List 15th edition	EU/EEA ships — first German yard added

Date	Event	Impact
30 April 2026	First FuelEU Maritime balance deadline (2025)>5,000 GT EU port calls	
21 May 2026	EU Directive 2024/1203 transposition deadlineEU Member States — criminal liability for environmental offences	
21 May 2026	EU Waste Shipment Regulation digital procedureEU Member States — criminal liability for environmental offences	Free-of-fair-ship fully digital
27 April – 1 May 2026	IMO MEPC 84 in London	Net-Zero Framework + future GHG measures
26 June 2030	HKC final deadline for existing ships ICIHM	Backstop date — earlier renewal events apply first

## Ready to Implement?

Book a 30-minute call with our IHM specialists.

We'll review your fleet's specific obligations and map a continuous compliance plan.

**SCHEDULE A COMPLIANCE CALL**

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