

A series of informative articles
jointly brought to you by:



NautilusLog
SGS IHM

Uncovering the Myths of IHM and IHM-Maintenance

Part 3: The Myth of Sister Ships and cheap IHMs

Find Part 1 - Introduction [here](#)

Find Part 2 - IHM & Laboratories [here](#)

Thousands of ships are facing the IHM-Deadline on **December 31st 2020** of EU and a good share of them is entirely unprepared. All EU-flagged as well as all EU-visiting ships above 500GT have to have a **certified and maintained IHM Part I** onboard then. In case evidence for becoming compliant in time can't satisfy the PSC-officers, 4 more months might be granted. But ultimately, severe financial penalties, up to and including imprisonment, are possible consequences in EU ports. IHMs are to be developed as per IHM-Guidelines (Res. MEPC 269(68)) of IMO for non-EU flagged vessels. For EU-flagged vessels the EU-Ship Recycling Regulation (EU-SRR) and non-mandatory "Best Practice Guidance" by EMSA is to be considered additionally.

Owners often see IHMs as a compliance aspect with no added value. IHMs are new to shipping and not everyone wants to learn more about it or understand the associated liabilities and risks. Realizing the urgency, owners might want to fix contracts as quickly and cheap as possible. Such clients are the "low hanging fruits" for some "IHM-Experts". If they are class-approved or not doesn't seem to make any difference. Considering additionally that IHM-certification is independent of ships class and IHMs full of assumptions and inconsistencies are stamped, the certificate is neither an indicator for quality nor a hurdle. As such, the formal requirement to have a certified IHM seems to be easily achievable.

As competition amongst IHM-Experts is tough, marketing of services with "very free interpretations" of the requirements and at low-costs seems to offer a convenient service to owners. The costs for IHMs depend to a great extent on application of analysis methods specified in the regulations by the laboratories and number of samples.

- 2 out of 3 listed methods are to be applied for asbestos analysis and prices vary by factor of 5. If only the cheapest method (PLM) is applied, some asbestos containing materials are not identifiable and those IHMs are critical.
- Selection of appropriate sampling points strongly depends on experience and training and are no indication for the quality of IHMs. An IHM based on 500 samples from non-critical materials is much worse than one based on 50 correctly chosen sampling points.

For achieving a low number of samples some propose to use IHMs of sister vessels and offer a big discount as hardly any costs apply. That's a promising business case, but not more. Any experienced IHM-Expert knows that the materials they need to look for still vary onboard ships, whether they're called sisters or not. Henning Gramann adds: "We only found two pretty much identical sister vessels in all of the 500 ships inspected so far. The impacts of major repairs, conversions and also common supplies are accumulating over the operational time and make formerly identical ships more and more incomparable."

It finally depends on the individual quality approach and business ethics of IHM Experts and using an efficient software tool for documentation of onboard activities, communication with the laboratories and generating IHMs and IHM-Reports reduces costs as well. Even though pricing for IHMs and certification is not the sole indicator for quality, the commitment of IHM-Experts to full compliance with EU-SRR and HKC in their true sense is essential. Squeezing words and using loopholes will not succeed and those doing it for short-term business success will probably disappear when market goes down. Then the owner is left alone with all the related liabilities. The IHM is a technical file which may become a risk when ownership changes or incompliances are detected by PSC which subsequently may lead to failing on charterers' orders when a ship is banned from certain ports or detained.

Another indicator for good IHM Expert services is how they guide owners in case asbestos is found onboard. This is the case for around 50% of all ships, independent of their age. As asbestos is banned under SOLAS, it can influence the asset value significantly. Knowledgeable IHM Experts are capable to advise on how to manage most of such finds. If this is not provided by the "IHM-Expert", owners might be pushed towards costly decontamination. Some experts also target the decontamination as follow-up business of their subsidized IHM-services even though decontamination costs may make a ship bankrupt. But a cheap IHM price opens many doors.

Even unwanted, better choose carefully than writing an entire book of lessons learnt!

Please watch out for follow-up articles providing detailed insights and support for IHM-compliance.