

VARUNA SENTINELS RESOURCE

IHM Audit Checklist

20-point continuous IHM maintenance health check for vessels
of 500 GT and above under HKC and EU SRR

Edition: April 2026

How to use this checklist

Walk through each item with your DPA, IHM Expert and superintendent. Mark **YES**, **PARTIAL** or **NO** against every line. Items marked PARTIAL or NO indicate areas where Port State Control detention risk and EU SRR enforcement exposure are highest. Each gap should have a named owner and a 30/60/90-day remediation plan.

Need a deeper review? Take the free 12-question scorecard at varuna-sentinels.com/hkc-eusrr-readiness-scorecard or book a call.

Section 1 — Certificate & Documentation

01.	International Certificate on Inventory of Hazardous Materials (ICIM) on board, valid and within five-year cycle.	[]	[]	[]
02.	IHM Part I document version-controlled with audit trail of every revision.	[]	[]	[]
03.	All Material Declarations (MDs) on/after 26 June 2025 use MEPC.405(83) format with 200 mg/kg cybutryne threshold.	[]	[]	[]
04.	Suppliers' Declarations of Conformity (SDoC) match each MD on file.	[]	[]	[]
05.	EU SRR substance list applied (PFOS, brominated flame retardants) for EU/EEA-flagged vessels.	[]	[]	[]

Section 2 — Continuous Maintenance Workflow

06.	Documented procedure for IHM update on every structural modification, equipment swap or material substitution.	[]	[]	[]
07.	Supplier MD pipeline auto-flags missing or out-of-format declarations.	[]	[]	[]
08.	Designated person ashore (DPA) receives renewal-deadline alerts ≥90 days in advance.	[]	[]	[]
09.	Annual confirmation surveys passed without IHM-related observations.	[]	[]	[]
10.	Dry-dock IHM update sequenced into yard scope before arrival.	[]	[]	[]

Section 3 — Port State Control Readiness

11.	Audit-ready evidence pack (digital) covering certificate, latest survey report, MDs, sampling results.	[]	[]	[]
12.	Crew briefed on responding to PSC IHM questions; reference copy available on board.	[]	[]	[]
13.	Reconciliation of IHM Part I content against current visible on-board materials.	[]	[]	[]
14.	Detention/observation history reviewed against fleet-wide IHM gaps.	[]	[]	[]

Section 4 — End-of-Life Readiness

15.	IHM Parts II (operational waste) and III (stores) maintained as live registers, not survey-event documents.	[]	[]	[]
16.	Ship Recycling Plan (SRP) draft template aligned with target yard's authorised vessel-type capacity.	[]	[]	[]
17.	Yard shortlist refreshed against current European List edition (15th edition Feb 2026: 41 facilities) and HKC-certified non-EU yards.	[]	[]	[]
18.	International Ready for Recycling Certificate (IRfRC) lead time planned around the 90-day validity window.	[]	[]	[]

Section 5 — PFAS / PFOS / Cybutryne

19.	PFOS firefighting foams replaced before 1 January 2026 SOLAS Chapter II-2 deadline.	[]	[]	[]
20.	PFAS-containing materials inventoried (insulation, cables, paints, gaskets, lubricants).	[]	[]	[]
21.	Antifouling system samples updated against the 200 mg/kg cybutryne threshold (MEPC.405(83)).	[]	[]	[]

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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