

**TO: Główny Inspektor Ochrony Środowiska, Pan Jerzy Kuliński**  
gios@gios.gov.pl

**CC: Minister Środowiska, Pan Maciej Grabowski - info@mos.gov.pl**  
**Minister Infrastruktury I Rozwoju, Pani Maria Wasiak - kancelaria@mir.gov.pl**



NGO  
SHIPBREAKING  
PLATFORM

**URGENT**

Concerning: Illegal export of *POLSTEAM* vessels

Dear Chief Inspector Kuliński,

7 September 2015

The NGO Shipbreaking Platform is an international coalition of environmental and human rights organisations seeking ethical and environmentally sound solutions to the current shipbreaking crisis. It has come to our attention that *POLSTEAM* has since 2009 exported 13 end-of-life vessels to South Asia for dangerous and polluting shipbreaking. Several of these vessels were sold whilst operating in EU waters (see annex) and thus were exported from the EU in contravention with the Basel Convention on the Transboundary Movement of Hazardous Wastes and their Disposal as incorporated to EU law via Regulation (EC) No 1013/2006 on Shipments of Waste. All the vessels further spent most of their operational life navigating EU waters under the Polish government's ownership.

The type and vintage of the *POLSTEAM* ships are assuredly going to contain significant amounts of hazardous materials such as asbestos and toxic paints, all listed hazardous wastes under the Basel Convention.

One of the last *POLSTEAM* ships sold for scrap was the bulk carrier ARMIA LUDOWA. It was sold to Bangladesh breakers whilst in Maltese waters and sailed directly from Malta to the scrapping beach in Chittagong, Bangladesh where shipbreaking is globally acknowledged not to respect even minimum human rights and environmental standards, as shown in this short video published by National Geographic: <https://www.youtube.com/watch?v=W0mtFN1bfZ8>

In India, Bangladesh and Pakistan, end-of-life vessels are demolished in the intertidal zone. This practice would never be allowed in the EU and has been banned in other ship recycling countries such as China, Taiwan and Turkey. The beaching of vessels does not allow for the containment and safe removal of hazardous waste from the structure of the vessel and cannot prevent the pollution of the coastal environment. Moreover, beaching cannot guarantee the protection of workers' health and safety. In particular the shipbreakers of Bangladesh employ children and young boys, which is illegal under international law as well as the Bangladesh Labor Act. We have documented the death and severe injuries of young boys. The International Labour Organisation (ILO) considers shipbreaking as one of the most hazardous jobs in the world.

We are aware that *POLSTEAM* is undergoing a fleet replacement and investment programme for the years 2015 to 2020 and still owns **at least 15 vessels built in the 1990s that are likely candidates for scrapping** in the next couple of years. With this letter we call upon the Polish Government to take the necessary action concerning *POLSTEAM*'s ship recycling practices as a matter of urgency.

We remind in that regard Poland of its obligations under Regulation (EC) No 1013/2006 on Shipments of Waste as well as the standards for ship recycling as required in the upcoming Regulation No 1257/2013 on Ship Recycling. None of the South Asian yards meet the requirements of the new EU Regulation on Ship Recycling and as an EU Member State owned shipping company, *POLSTEAM* should set an example and adhere to a ship recycling policy that is in line with EU standards and legislation. It is a disgrace to have a Polish state owned company listed amongst the top dumpers of toxic end-of-life ships on the beaches of developing countries.

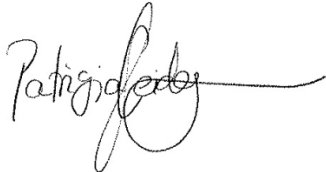
We have informed the European Commission about the *POLSTEAM* ships and urged them to publicly articulate the legislative context of the EU on shipments of waste, as well as the EU requirements for safe and environmentally sound ship recycling, and to demand that Poland comply with these rules.

The NGO Shipbreaking Platform, the European Environmental Bureau, Fundacja Instytut na rzecz Ekorozwoju and Towarzystwo na Rzecz Ziemi hereby expresses again their deep concerns about the Polish government's breach of existing EU and international legislation and its poor practice of selling end-of-life vessels for

dangerous and polluting shipbreaking on the beaches of India, Bangladesh and Pakistan.

We remain of course available should you wish to further discuss this matter with us to find sustainable end-of-life solutions for the *POLSTEAM* fleet.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Patrizia Heidegger', with a long horizontal flourish extending to the right.

Patrizia Heidegger  
Executive Director  
NGO Shipbreaking Platform

**On behalf of the following NGOs:** *European Environmental Bureau, Polish environmental NGOs Fundacja Instytut na rzecz Ekorozwoju and Towarzystwo na Rzecz Ziemi, as well as the NGO Shipbreaking Platform members: Ban Asbestos Network, Bangladesh Environmental Lawyers Association, Bangladesh Institute for Labour Studies, Basel Action Network, Bellona, Corporate Accountability Desk India, European Federation for Transport and Environment, Greenpeace, North Sea Foundation, OSHE, Sustainable Development Policy Institute Pakistan, The Centre for the Rule of Law – Islamabad, Legal Initiative for Forest and Environment, Toxics Link, The International Federation for Human Rights, and Young Power in Social Action.*

See [www.shipbreakingplatform.org](http://www.shipbreakingplatform.org) for more information

**ANNEX I** Polska Zegluga Morska (POLSTEAM) vessels sold for substandard breaking since 2009

<b>Beneficial Owner</b>	<b>Ship Name</b>	<b>IMO #</b>	<b>Last flag</b>	<b>Last voyage from EU</b>	<b>Destination</b>	<b>Beaching</b>	<b>Built</b>	<b>Type</b>
Polska Zegluga Morska (POLSTEAM)	Solidarnosc	8813934	Vanuatu	Left UK 30.05	Pakistan	14/08/2015	1991	Bulker
Polska Zegluga Morska (POLSTEAM)	Armia Ludowa	8502535	Liberia	Left Malta 09.04	Bangladesh	10/05/2015	1987	Bulker
Polska Zegluga Morska (POLSTEAM)	Polska Walczaca	9011923	Vanuatu	NA	Bangladesh	11/02/2015	1992	Bulker
Polska Zegluga Morska (POLSTEAM)	Szare Szeregi	8813958	Vanuatu	NA	Pakistan	27/09/2014	1991	Bulker
Polska Zegluga Morska (POLSTEAM)	Legiony Polskie	8919611	Vanuatu	NA	Pakistan	15/09/2014	1991	Bulker
Polska Zegluga Morska (POLSTEAM)	Orleta Lwowskie	8813960	Vanuatu	Left UK 14.07	Pakistan	15/09/2014	1991	Bulker
Polska Zegluga Morska (POLSTEAM)	Armia Krajowa	8813946	Vanuatu	Left UK 04.04	India	18/05/2014	1991	Bulker
Polska Zegluga Morska (POLSTEAM)	Stanis	8502559	St Kitts & Nevis	Left Italy 13.05	Bangladesh	15/10/2013	1988	Bulker
Polska Zegluga Morska (POLSTEAM)	Maciej Rataj	8219322	Malta	Left Spain 16.03	Bangladesh	28/05/2013	1985	Bulker
Polska Zegluga Morska (POLSTEAM)	Major Hubal	8219310	Malta	Left Portugal 15.01	India	30/03/2013	1985	Bulker
Polska Zegluga Morska (POLSTEAM)	Ziemia Chelminska	8207769	Liberia	Left Spain 30.09	India	30/11/2011	1984	Bulker
Polska Zegluga Morska (POLSTEAM)	Penelope	8908870	Bahamas	NA	India	18/06/2011	1996	Tanker
Polska Zegluga Morska (POLSTEAM)	General Dabrowski	8124292	Panama	Left UK 05.01	Bangladesh	20/04/2011	1982	Bulker
Polska Zegluga Morska (POLSTEAM)	Uniwersytet Slaski	7637852	Malta	Left UK 30.09	Bangladesh	6/01/2010	1979	Bulker