



NGO  
SHIPBREAKING  
PLATFORM

# IMPACT REPORT

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2018  
2019



# ABOUT US

The NGO Shipbreaking Platform is a coalition of environmental, human- and labour rights organisations working to promote safe and environmentally sound ship recycling globally. The Platform was first created in September 2005 after the few NGOs working on the issue noticed that a broader base of support, a stronger network of organisations from ship-owning and shipbreaking countries, and a long-term approach were needed to challenge the political clout of the shipping industry.

# VISION

Our vision is that vessels are recycled in facilities that ensure clean, safe and just practices, offering decent and safe jobs. Our commitment to finding sustainable global solutions is based on the respect for human rights and the principles of environmental justice, producer responsibility, 'polluter pays' and clean production.

The coalition quickly evolved from being a European Platform to a global one, including NGOs based in the major shipbreaking countries India, Bangladesh, Pakistan and Turkey. It now has 18 member organisations and six partners in 12 countries. The Platform is recognised by United Nations agencies, the European Union and leading media outlets as the pre-eminent international civil society advocacy organisation on ship recycling.

# MISSION

To advocate for clean, safe and just ship recycling globally in respect of human rights, core labour standards and environmental justice, and for the prevention of dirty and dangerous practices, such as the dumping of end-of-life vessels on the beaches of developing countries.

## ABOUT THIS REPORT

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## FIND US ONLINE

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# EDITORIAL



These past two years the Platform has won support for sustainable ship recycling in the financial sector while raising the stakes for ship owners who break their ships irresponsibly on South Asian beaches. New milestones in international law and corporate accountability have made these past two years encouraging and motivating.

Recognizing the power of the financial sector to motivate the decisions of ship owners, the Platform Secretariat reached out to marine insurers in 2019. As a result of these efforts, the International Union of Marine Insurers, which represents over 40 national marine insurance associations and 90 percent of the world's marine insurance premium, announced that ship recycling would be one of their environmental, social and governance focus areas. Our work with banks and investment funds further saw the Norwegian Central Bank divest from Evergreen shipping company in 2018 for selling its ships for breaking on the beaches of Bangladesh.

We are further thrilled to report new laws that will move ship owners away from dangerous scrapping and towards sustainable ship recycling. The Basel Ban Amendment, long advocated by the Basel Action Network and other Platform members, became international law in 2019 and bans developed EU and OECD nations from exporting hazardous wastes to developing countries. In addition, the Platform Secretariat successfully countered industry efforts to delay the

requirement for recycling of EU flagged vessels at EU audited and approved ship recycling yards. After hearing the Platform's evidence that EU list of approved ship recyclers had sufficient capacity to recycle Europe's end-of-life ships, Commissioner Vella determined to put the list into operation without delay.

The Platform worked closely with law enforcement officials and legal firms in 2019 to hold shipowners accountable for breaking ships in dangerous and polluting yards. The Leigh Day law firm broke new ground when it sued the shipping consortium, Maran UK, for the fatal accident of a worker who died breaking the company's ship in Bangladesh and for failing to exercise due diligence when the company sold its ship for breaking at the substandard yard. Elsewhere, the Norwegian police economic crime unit, alerted by the Platform, is for the first time investigating a Norwegian ship-owner, as well as its insurance company and surveyor, for intent to illegally export a vessel for scrapping in South Asia. Taking note of the Platform's contribution to these and other criminal cases, Europol last year invited the Platform to brief its organization on illegal exports of end-of-life ships.

On the ground, the "Life Boat Project" led by Platform members, BELA, OSHE and YPSA empowered workers by providing a safe space where workers could meet in solidarity, learn about their rights, and receive legal and medical assistance. The Secretariat managed a three-year grant from the US State Department to coordinate the project, which is now self-directed by workers in Chattogram. In India, our data and research were instrumental in helping journalists and researchers expose the appalling labor conditions behind the greenwash campaigns in Alang.

High levels of mercury and other hazardous wastes make scrapping of floating oil and gas units especially dangerous and are a concern as their oversupply is sending more of such units for breaking on the beaches of India, Bangladesh and Pakistan.

Cases such as the FPSO North Sea Producer, whose import, beaching and breaking the Bangladesh Supreme Court ruled illegal; the detainment of Diamond Offshore units by the Scottish Environment Protection Agency following an alert by the Platform; and notifying Bangladesh and Indian authorities on exports of mercury-laden floating units exemplify our efforts to counter this trend. In 2019 with support from Norway's government pension fund, KLP, and the European Commission, the Platform reported on the demolition for end-of-life floating oil and gas units. We will continue to focus on the oil and gas sector in 2020 with support from Royal Academy of Engineering and Lloyds Register Foundation.

Looking forwards change will come through leadership, incentives and accountability. This year the Board added a new position to the Secretariat to cultivate leadership within the shipping and financial sectors. We continue to push for incentives such as using recycled scrap steel in public procurement or levying port fee deposits that return to the owner after a ship is recycled at an approved yard. Integrating ship recycling with ship building may innovate design, provide a stable recycling platform or new opportunities for currently marginalized shipbreaking workers. Yet despite its complexities, shipbreaking isn't rocket science. Technologies for safer recycling exist. The Platform has documented over 400 deaths in the shipbreaking yards since 2009. Companies can save lives by recycling their ship on a quayside or in drydock, in countries with capacity to manage hazardous waste and to provide human and environmental protections.

**Helen Pérvier**  
**President of the Board**  
**NGO Shipbreaking Platform**



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# WHAT IS THE PROBLEM?

Just as the goods they transport, ships too become waste when they reach the end of their operational lives. When compared to sinking or abandonment, recycling is by far the most environmentally-friendly and economically sound way of getting rid of old ships, as it ensures the reuse of valuable resources such as steel. Ship recycling is, however, a heavy and hazardous industry that exposes both workers and the environment to a great number of risks, and today, only a fraction of end-of-life vessels are disposed of in a safe and environmentally sound manner.

Most ships are taken apart under rudimentary conditions on the beaches of Alang in India, Chattogram in Bangladesh and Gadani in Pakistan. There, vessels are grounded deliberately during high tide. Breaking operations usually take place during low tide when the ship is not submerged by the sea. The human and environmental toll of the shipbreaking activities on these three beaches is devastating due to the lack of adequate infrastructure, equipment and procedures to prevent accidents and pollution.

Ship owners, on the other hand, earn (USD) millions more by selling their obsolete vessels to yards that use the low-cost method of beaching and exploit vulnerable workers, local communities and fragile ecosystems.

## DIRTY PRACTICES

Millions of tons of hazardous wastes are exported to South Asia in the form of end-of-life ships each year. Ships contain numerous toxic materials such as asbestos, polychlorinated biphenyl (PCBs), oil residues and heavy metals. Unless these materials are properly managed, there is a risk of exposure that can harm both workers and the environment. When ships are grounded, pulled and broken apart on intertidal mudflats, there are no means to contain or remediate pollution. Instead, the tide washes away debris, paint chips and oil spillages. The pollution, as well as the uprooting of coastal vegetation, including protected mangrove forests, endanger the biodiversity of the coastal areas and affect the livelihoods of the local fishing communities.

In most cases, the hazardous substances built into the structure of the vessels are not even properly identified and therefore harm workers unknowingly. Large amounts of hazardous materials are further either illegally dumped or resold in local markets. In Bangladesh and Pakistan there is no waste treatment, storage and disposal facility. In India, it is furthermore still legal to re-sell asbestos contaminated materials.

The beaching yards were set up without environmental impact assessments having been made, and they continue to operate without being subject to thorough environmental monitoring.

## DANGEROUS PRACTICES

Shipbreaking is according to the International Labour Organisation (ILO) one of the most dangerous jobs in the world. When conducted on tidal beaches, without proper infrastructure to allow for rapid emergency response and the safe use of heavy lifting cranes, the danger workers are exposed to, of course, increases.

On the South Asian beaches unskilled migrant workers are deployed by the thousands to break down the vessels manually. Without protective gear, they cut wires, pipes and blast through ship hulls with blowtorches. Accidents kill or maim numerous workers each year, and the situation is worsened by the fact that in the vicinity of the shipbreaking beaches there are no hospital facilities capable of providing the necessary medical treatment to severely injured workers.

Loss of life and serious injuries are caused by suffocation, explosions, fall from great height and crushing down of heavy steel plates. Since 2009, the Platform and its local members have documented at least 400 fatalities at the beaching yards. Due to the lack of transparency in the industry, it is expected that the actual number of workers that have been killed or maimed is much higher. Many more workers suffer from occupational diseases, including cancer and asbestosis, years after having been

exposed to toxic fumes and substances at the shipbreaking yards.

Carried out in large part by the informal sector, shipbreaking in South Asia is rarely subject to occupational health and safety controls or inspections. Most workers are employed on day-contracts. They work long hours without holidays, and trade unions are prevented from effectively organising them. Children are especially vulnerable to toxins and dangerous conditions, and child labour in hazardous industries, such as shipbreaking, is therefore banned by both international and national legislation. Yet, in Bangladesh an estimated 13 percent of the workforce are children.

## AVOIDING RESPONSIBILITY: CASH BUYERS AND FLAGS OF CONVENIENCE

With the exception of responsible shipping companies that directly engage with recycling facilities in Europe, Turkey, US or China, the vast majority of ship owners sell their obsolete vessels to so-called ‘cash buyers’. Cash buyers are scrap-dealers specialised in the trade of end-of-life vessels. Any deal struck with a cash buyer is hence a demolition deal.

Ship owners obtain the highest price, upfront and in cash, for their end-of-life asset when selling to a cash buyer. Price is a clear and primary indicator of the final scrapping destination, and, currently, the highest prices are offered

by the worst yards. By using middlemen that change the registration, flag and name of the vessel on its final voyage, ship owners also seek to avoid any legal or reputational risks linked to the increasingly criticised beaching yards. Hiding behind concealed corporate structures and flags known for their poor implementation of international maritime law and which are particularly popular with cash buyers, such as Comoros, Palau and St Kitts and Nevis, it is extremely challenging for authorities to trace and hold ship owners accountable for these illicit practices.



## SHIPBREAKING ON THE BEACH

- HIGH RISK OF ACCIDENTS AND OCCUPATIONAL DISEASES
- LACK OF PROPER MEDICAL AND HEALTHCARE FACILITIES
- BREACH OF LABOUR RIGHTS
- EMISSIONS TO AIR, SEA AND GROUND IN INTERTIDAL ZONE
- POOR OR NO TREATMENT OF HAZARDOUS WASTES
- LACK OF TRANSPARENCY

## SUSTAINABLE SOLUTIONS

Clean and safe methods of ship recycling are available. The most sophisticated method is to dismantle the ship in a dry dock where it can be recycled under similar conditions to those under which it was built, maintained and repaired throughout its operational life: in a fully contained industrial site with the help of heavy machinery. A more widely practised alternative is pier-side demolition, as in China, Europe and the US. Here the ship is moored long-side at a quay, cut horizontally, and heavy parts are lifted onto shore with the help of cranes. The lower part of the hull is then brought on a slipway and cut in a contained environment and impermeable surface. Under the EU Ship Recycling Regulation, the European Union (EU) maintains a list of approved ship recycling facilities. This list provides ship owners, and all stakeholders in the supply chain management, with a clear reference for sustainable solutions.

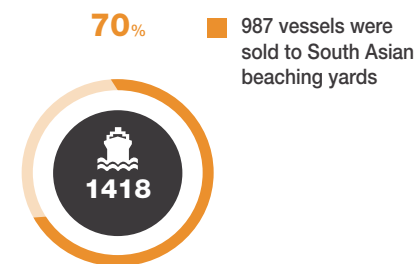


# THE GLOBAL SHIPBREAKING CRISIS

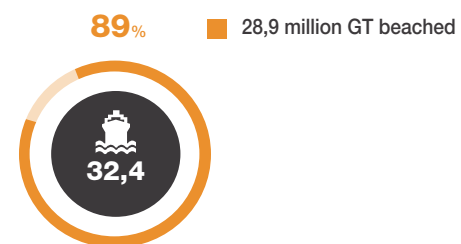
## FACTS & FIGURES

### TOTAL

#### NUMBER OF SHIPS DISMANTLED WORLDWIDE



#### GROSS TONNAGE (MILLION) DISMANTLED WORLDWIDE



Each year the NGO Shipbreaking Platform collects data and publishes an annual list of ships dismantled worldwide. In 2018 and 2019, 1418 vessels were dismantled. 987 of these ships were sold for dirty and dangerous breaking on the beaches of South Asia. Whilst ship owners are increasingly portraying themselves as conscious of the problems caused by shipbreaking, the Chattogram shipbreaking yards in Bangladesh – where the protection of the environment and workers' health and safety is particularly poor – remained the preferred scrapping destination worldwide in terms of tonnage dismantled.

Most vessels scrapped in the biennium were tankers, followed by general cargo ships, container ships, bulk carriers, roll-on roll-offs, passenger vessels and oil platforms. Looking at the size of vessels scrapped on the beaches of South Asia, Pakistan received the largest vessels followed by Bangladesh, while Indian yards scrapped more medium-sized ships. Turkey tends to recycle smaller vessels on average. Thus, the larger the vessel the more likely that it will end up on a beach in Pakistan or Bangladesh – where the conditions are known to be the worst.

United Arab Emirates (UAE) and Greece top the list of country dumpers in 2018 and 2019. UAE owners were responsible for the highest absolute

number of ships sold to South Asian shipbreaking yards: 106 ships in total. Since the Platform's first compilation of data in 2009, Greek shipping companies have unceasingly topped the list of owners that opt for dirty and dangerous shipbreaking.

The number of European-owned and/or European-flagged vessels beached in 2018 and 2019 amounted to 271 ships. In terms of tonnage, European ship owners, from the EU and EFTA states, are responsible for almost one third of all ships sold for breaking to the beaching yards. The EU controls 40% of world operational fleet and thus has a particular responsibility to find solutions to the shipbreaking crisis and reverse the trend of unsustainable recycling.

Out of the 271 European vessels that were beached, only 10 were still sailing under a European flag during the last voyage. 27 vessels that had otherwise been operating under European flag, swapped to a non-EU flag of convenience just weeks before hitting the beach in an attempt to circumvent EU law. The most popular end-of-life flags for vessels scrapped on the beaches in 2018 and 2019 were Comoros, Liberia, Palau, Panama and St Kitts and Nevis. The flags of Comoros, Palau and St Kitts and Nevis are almost exclusively used by cash buyers at end-of-life. These are flags known for

their poor implementation of maritime law. Legislation based on flag state jurisdiction alone will not be successful in shifting the industry towards better practices. The Platform is therefore calling for incentives that incorporate the polluter pays principle, such as a return-scheme for ships collected at ports during operational life.



*"Companies sell their end-of-life tonnage to the beaching yards as that is where they can make the highest profit. But these are profits made on the back of exploited workers and fragile ecosystems. The beaching yards are furthermore toxic hotspots, and, without a proper clean-up, the pollution caused by more than three decades of reckless shipbreaking will continue to harm the local environment and the communities that depend upon it for many years to come."*

**Ingvild Jenssen, NGO Shipbreaking Platform Executive Director and Founder**

#### MAIN SHIPBREAKING DESTINATIONS

BANGLADESH

419 ships

15,785,755 GT

INDIA

453 ships

8,584,610 GT

PAKISTAN

115 ships

4,500,306 GT

CHINA

51 ships

728,352 GT

TURKEY

220 ships

2,132,149 GT

REST OF THE WORLD

160 ships

671,929 GT

#### WORLD'S WORST SHIPPING NATIONS

■ BEACHED SHIPS

■ SHIPS DISMANTLED OFF THE BEACH

UNITED ARAB EMIRATES

108

04

GREECE

97

17

UNITED STATES OF AMERICA

81

44

INDIA

62

SOUTH KOREA

51

05

SINGAPORE

49

01

RUSSIA

45

28

CHINA

33

40



# MONITORING THE PROBLEMS OF SHIPBREAKING IN INDIA

## WHAT IS THE ISSUE?

The beach in Alang, India is one of the main destinations for end-of-life vessels. Dangerous working conditions and pollution in Alang were first documented by Greenpeace in 1998. Following legal actions taken by local NGOs, the Indian Supreme Court directed the industry to align itself with national and international labour and environmental laws. The Government responded by adopting the Ship Recycling Code in 2013 and the setting up of a waste reception facility. Workers now receive a very basic training. Yet, the conditions in Alang remain deplorable as revealed by the Platform, independent journalists and researchers that have been able to visit the yards despite access becoming increasingly challenging. Reports and undercover footage expose breaches of labor rights, disregard for even the most basic health and safety standards, and extremely polluting practices. Yard owners are operating with impunity.

According to local sources at least 14 workers died at the yards in 2018, making it one of the worst years for the Alang shipbreakers in terms of fatalities. In 2019, two deaths were recorded at yards that are upheld by industry stakeholders as having undergone the most improvements. Due to the lack of transparency in the sector, the real number of fatalities is expected to be

higher. Furthermore, serious injuries are rarely recorded and occupational diseases are not documented at all.

The companies involved, as well as local authorities, seek to thwart public scrutiny of the deplorable conditions in Alang. They also seek to greenwash the beaching method with the handing out of misleading and privately issued certificates (see box on Statements of Compliance with the Hong Kong Convention).



*“There are serious breaches of national laws aimed at the protection of workers’ rights at the shipbreaking yards. Enforcement and monitoring of labour laws continue to be a major challenge in Alang. Local authorities do not even have an updated database on the number of workers at the shipbreaking yards, which renders it difficult to ensure the welfare of the workforce. There is an urgent need for coordination at all levels, involving local and national authorities.”*

**Dr Geetanjoy Sahu, Associate Professor at Tata Institute of Social Sciences (TISS)**

Disregard of the negative environmental impact of the beaching method, including hazardous operations in the intertidal zone, remain serious concerns, as does the lack of proper accommodation and medical facilities for workers. Asbestos contaminated materials can be resold in India and there is no proper disposal site for PCBs.

## WHAT HAVE WE DONE?

### DEBUNKING INDUSTRY GREENWASHING

In the reports “Where ships go to die” and “The Hypocrisy of Better Beaches”, the Platform teamed up with Belgian journalist Gie Goris, Editor in Chief of MO\* Magazine, to have a closer look at the practices in Alang and the political context behind the illegal trade of toxic waste ships. In Alang, Gie Goris met workers deprived of their rights and risking their health and safety on a daily basis for a meagre wage. With a focus on Swiss ship owners, it was revealed how companies such as container giant MSC, use the Alang beach to dispose of their floating toxic waste while boosting their profits. The stark contradiction between sustainability promises and actual practices, as well as the lobbying for double standards by embedded policymakers in Europe was uncovered. The research received Public Eye’s “Investigation Award”.

### ALERTING AUTHORITIES OF ILLICIT PRACTICES: THE YETAGUN

The Platform, European Environmental Bureau (EEB) and Zero Mercury Group warned Indian authorities of the breach of international waste laws related to the export of the mercury-laden FSO YETAGUN, and urged India to halt the import of the contaminated ship. Despite an initial rejection, the permission to import the vessel was eventually given. The circumstances under which the beaching and breaking of the vessel were allowed remain unclear, but documents obtained by the Platform show that the Indian authorities admitted lacking capacity to

detect mercury contamination beyond the slops. E-mails and confidential documents obtained by Dutch investigative journalists at Zembla show that SBM Offshore, the owner of the FSO, attempted to conceal the high concentration of mercury in the ship’s steel, in order to avoid clean-up costs. In their statements to Zembla, SBM Offshore and the Indian shipbreaker maintained that the demolition was carried out in a safe way, and held forth a so-called Statement of Compliance with the Hong Kong Convention (see box) and inspection report - both issued by Japanese classification society ClassNK - as evidence. However, undercover

recordings and discussions with several workers that dismantled the YETAGUN revealed a shocking account of the actual conditions at the beaching yard. Workers are not provided with appropriate personal protective equipment and were completely unaware of the poisonous mercury contamination. Several stated that full safety gear is distributed only when inspections take place. Toxicologists that have reviewed the documents on the hazardous materials onboard the YETAGUN say it is impossible that no high levels of mercury were detected during cutting operations, as claimed by ClassNK.

## WHAT ARE STATEMENTS OF COMPLIANCE WITH THE HONG KONG CONVENTION?

From four yards in Alang receiving the first Statements of Compliance (SoC) with the Hong Kong Convention in 2015, more than 90 yards, out of a total of 154 yards, are now reported to have obtained such a Statement. The industry push to make beaching yards seem “green” has been promoted through the proliferated hand-outs of these Statements. Whilst these privately issued Statements assess the possibility for a given yard to

comply with Hong Kong Convention requirements, the standards set by the convention have been strongly criticised for being too weak, ignoring also crucial issues such as labour rights and downstream waste management. The Statements do not look into a given practice of a yard, nor do they look into the adequacy of the claimed compliance. With a check-list approach, poor quality environmental monitoring, even when the results of the monitoring

are unreliable or blatantly deceptive, will for example qualify for obtaining a Statement. For these reasons, it is widely acknowledged by experts on ship recycling that the Statements do not provide the guarantee that the conditions at the yard are safe and environmentally sound. Yet, they are used to mislead stakeholders to believe that operations are sustainable.



## MONITORING THE PROBLEMS OF SHIPBREAKING IN BANGLADESH

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### WHAT IS THE ISSUE?

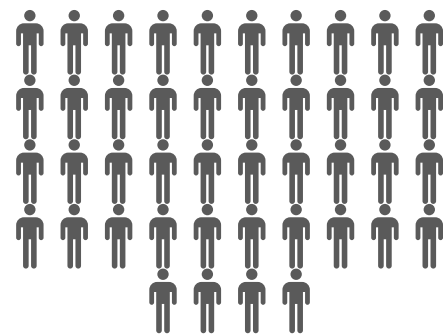
In terms of tonnage, the Chattogram yards have become the world's top destination for end-of-life vessels. The conditions there are abysmal. Concerns include dire working conditions, high fatality rates, exploitation of child workers, severe pollution of air and the marine environment as well as the uncontrolled dumping of hazardous wastes. Journalists, including from National Geographic, the Guardian and Al Jazeera, have brought back shocking reports on the human rights abuses and environmental degradation caused by the shipbreaking activities.

In 2009, a land-mark decision by the Supreme Court ordered the closure of the shipbreaking industry as none of yards held the necessary environmental clearance to operate. After only two months of closure the yards were, however, allowed to re-open with incomplete authorisations in hand and little change in practice. In 2016, the Supreme Court therefore issued a contempt ruling against both the authorities and shipbreaking yard owners for continued breaches of national environmental and labour laws. Whilst the case is still ongoing, yards continue to operate in blatant breach of the Courts decisions.

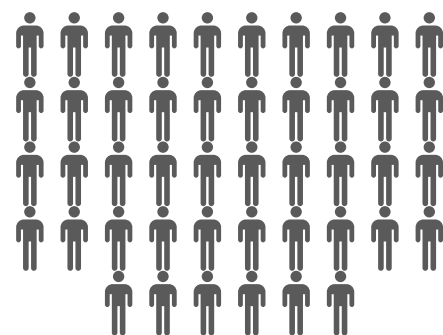
National laws are poorly implemented due to weak enforcement capacity, or deliberately ignored as a result of industry pressure. End-of-life vessels are imported with fake documents claiming that they are toxic-free. As a consequence, toxins are not properly detected nor safely removed. The coastal ecosystem and the local communities depending on it are devastated by toxic spills. Currents and tides distribute the pollutants not only along the coast, but also further inland during the monsoon season. Since Bangladesh has no storage, treatment and disposal facility for hazardous wastes, these toxics are simply dumped or re-sold on the second-hand market, causing further harm to surrounding communities. The World Bank has estimated that between 2010 and 2030 Bangladesh will have imported 79.000 tons of asbestos; 240.000 tons of PCBs and 69.200 tons of toxic paints that originate from end-of-life ships.

Out of the three South Asian shipbreaking beaches, the Platform has by far recorded the highest number of fatalities in Bangladesh. In 2018 and 2019, the Platform documented the stories of 44 workers who were killed and 46 who suffered severe injuries. There is no ambulance available to bring injured workers to the closest specialised hospital located an hours' drive away from the yards. Not even

emergency first aid equipment is available at many yards, nor do workers automatically receive financial support for necessary medical treatment.



**\*At least 44 workers died**



**\*At least 46 workers were severely injured**

Of particular concern at the shipbreaking yards in Bangladesh is the employment of children. It is illegal under Bangladesh's Labour Act to employ children and adolescent workers in hazardous industries such as shipbreaking. Yet, in a recent study issued by the University of Chattogram, it was found that 13 percent of the workers were under the age of 18. Whilst exploitation of the youngest children seems to have ceased since the publication of a previous report by the Platform and member organisations, Young Power in Social Action (YPSA) and International Federation for Human Rights (FIDH) in 2008, many young teenagers between 15-17 years old are now offered work during nightshifts.

Holding the industry to account at the local level for the damage it causes is challenging. The yard owners are well connected both economically and politically. The capacity of local labour inspectors is almost non-existent. Local activists, journalists and workers who have been vocal about the dire conditions at the yards have thus found little support, and have even been threatened.

### WHAT HAVE WE DONE?

#### LIFEBOAT PROJECT

With support from the US State Department, the Platform and its members Bangladesh Occupational Safety, Health and Environment Foundation (OSHE), Bangladesh Environmental Lawyers Association (BELA), and YPSA implemented a three-year project, the LIFEBOAT project, aimed at promoting internationally recognised labour rights in the shipbreaking sector and strengthening the engagement of the Child Labour Elimination Committee. The Platform's member organisations in Bangladesh assisted the most vulnerable workers by providing free medical camps; legal assistance to workers that have suffered injuries, or to the families left behind following a fatal accident, so that they can obtain the compensation they are entitled to get according to Bangladesh

law; trainings on occupational health and safety; and alternative vocational trainings to child workers so that they can gain the skills to find an employment which does not put their health and life at risk.

More than 100 complaints were filed in the Labour Court under the LIFEBOAT project on issues including verbal termination, lack of medical treatment and unpaid wages. The vast majority of the cases were successfully resolved. One particular case set an important precedent for increased compensation in the case of injury or death of a worker. With the help of the LIFEBOAT project, the mother of Shochindra, an under-aged worker who was killed in an accident on 21 May 2017, issued charges against one of the largest shipbreaking companies, Kabir Steel. Kabir Steel's Managing Directors were summoned to appear in Court and ordered to pay 500.000 BDT (5.500 EUR) as compensation to Shochindra's mother. Whilst the amount remains meagre, it was five times more than the average compensation fixed by the Bangladesh Labour Act. Risking three months imprisonment if the amount was not paid, Kabir Steel's Directors settled. The case prompted an important milestone for the increase of compensation amounts, which effectively became double by an amendment of the Bangladesh Labour Law in 2018. Now, shipbreaking workers are entitled to 200.000 BDT (2.200 EUR) compensation from yard owners via the Labour Court.

#### MAERSK'S TOXIC TRADE: THE NORTH SEA PRODUCER

In August 2016 the FPSO NORTH SEA PRODUCER was beached in Chattogram, Bangladesh. The ship was allowed to leave the UK based on false claims that it would be further operationally used in the Tin Can port in Nigeria. The owners of the FPSO, Danish A.P. Moeller Maersk and Brazilian Odebrecht had in fact sold the ship to the largest vessels' scrap dealer, cash buyer GMS, through a St. Kitts and Nevis post box company, and the FPSO was towed thereafter directly all the way from the UK to the shipbreaking yards in Bangladesh.

The Platform was quick to alert both the UK and Bangladesh authorities about the illegal export. Platform member organisation BELA succeeded in requesting an injunction on the breaking of the vessel in 2017 based on the detection of radiation levels higher than permitted. In a milestone judgement, on 14 November 2019, the Supreme Court of Bangladesh finally declared that the import, beaching and breaking of the FPSO NORTH SEA PRODUCER was illegal. The Court further noted with dismay the incessant violations of national and international laws by the shipbreaking industry, and passed several directions upon the government to regulate the sector in line with earlier rulings.

After winning the case on the illegal import and beaching of the NORTH SEA PRODUCER, the Platform is now urging the UK to hold the ship owners and cash buyer GMS accountable for the illegal export of the FPSO. Criminal investigations have been initiated by the UK environmental agency.



*"The judgment is important in that it has expressly called the import, beaching and breaking permits illegal, and for the first time a breaker has been put off the breaking operation and the government has been given the steering. It is even more important because it has required the government to regulate the dubious roles of the cash buyers and restrict import from grey- and black-listed flag registries. This will surely make it difficult for the unscrupulous players to treat Bangladesh as a dumping ground."*

**Syeda Rizwana Hasan, Supreme Court Lawyer and Director of Bangladesh Environmental Lawyers Association**



## MONITORING THE PROBLEMS OF SHIPBREAKING IN PAKISTAN

© Novakovic

### WHAT IS THE ISSUE?

The conditions at the shipbreaking yards in Pakistan are not any better. As in India and Bangladesh, the yards in Gadani operate directly on the beach without any impermeable and drained working areas to protect the sea and sand from pollution. As there is no infrastructure to deal with hazardous waste in Gadani, dangerous and polluting substances – such as asbestos, PCBs and residue oils – are simply dumped behind the shipbreaking area.

Workers' health and safety are blatantly ignored in Gadani, and trade unions, such as the IndustriAll-affiliated Pakistan National Trade Union Federation (NTUF), have voiced strong concerns related to the systemic breaches of basic labour rights. Most of the shipbreaking workers in Gadani are migrant workers from the poorest regions of Pakistan.

Following the explosion of 1 November 2016 of the ACES tanker, there has been increased awareness, nationally and internationally, of the dangers faced by the workers in the shipbreaking yards in Pakistan. Many workers lost their lives in the explosion that took the Pakistani military three days to extinguish. Without any ambulances

available at the yards, it was also a major challenge to bring severely burnt workers to the nearest hospital in Karachi. Despite attempts by local and regional authorities to better regulate safety procedures at the yards, in the beginning of 2017, five workers lost their lives in another explosion on a tanker. This led to a moratorium on the import of tankers imposed by the government. Yet the ban was lifted in 2018, without concrete measures in place, such as mandatory gas-free-for-hot-work, to prevent the reoccurrence of these tragedies.

Figures, however, clearly show a significant decline in shipbreaking activities in 2018 and 2019. This development is caused by several factors, including the devaluation of the Pakistani Rupee and imports of cheap metal billets from neighbouring countries, and has resulted in the closure of the majority of the yards and thus the return of migrant workers to their home villages.

*“Gadani, once one of the world's largest shipbreaking hubs, has now lost that status. There is no doubt that the major explosion on 1 November 2016 that killed at least 30 workers on the spot and severely burnt even more, revealed the catastrophic conditions at the yards and prompted both inquiry and adoption of more stringent safety regulations. However, whilst the safety at workplace as a result has slightly improved, no change occurred in beaching practices. That the coastal environment is now slowly showing signs of recovery is not due to any upgraded environmental management at the yards, but is rather a result of the significant decrease in the number of ships coming for breaking on the beach. Any attempts to revive the industry in Pakistan must ensure that the recycling operations take place in industrial zones where both the environment and workers can be protected.”*

**Dr. Irfan Khan, NGO Shipbreaking Platform Board Member**

## OTHER RECYCLING DESTINATIONS

© Navaleo

### TURKEY

Turkey dismantled 220 ships in 2018 and 2019, including several drilling ships and platforms. In comparison to South Asia, Turkey dismantles smaller vessels, many of them either EU-owned or EU-flagged. Aliaga is also a preferred destination for EU navy vessels.

Although Turkish yards do not beach vessels, the landing method which is used also poses environmental challenges, as the risk of slag and paint chips falling into the water is high. Through engagement with NGOs and labour rights groups, the Turkish Ship Recyclers Association remains attentive to constantly improving the industry practice, and the yards are open to independent researchers.

Six yards in Aliaga are currently included on the EU list of approved ship recycling facilities. In order to make it on the EU list, the yards are subject to on-site assessments of their environmental and social performance.

### REST OF THE WORLD

#### EUROPEAN UNION

In December 2016, the EU published the list of ship recycling facilities that are approved according to the EU Ship Recycling Regulation and located in EU Member States. 34 out of 41 facilities approved so far are located in the EU. These yards are currently mainly recycling government-owned and smaller vessels, and operate grossly under-capacity. They have signalled that the promise of a larger market share would prompt investments to enlarge the yards so that they could recycle more as well as larger commercial ships.

#### UNITED STATES

In the US, facilities are able to recycle vessels in a safer and more environmentally friendly way than on the beaches of South Asia. Most facilities are located in Brownsville, Texas. One of these facilities has been included on the EU List.

#### CHINA

Several Chinese yards that have the capacity to recycle a substantial amount of large vessels alongside piers and in docks are currently out of business. As of 1 January 2019, China closed the market for the recycling of foreign flagged ships. This decision comes on

the back of China's efforts to crack down on pollution and waste producing industries in the country, and follows a ban on the import of a large number of hazardous wastes, including plastics.

#### INDONESIA

Smaller vessels are known to be broken in Indonesia. Recent media investigations revealed appalling social and environmental conditions at a breaking yard located in Cilincing, North Jakarta.

#### PHILIPPINES

In the Philippines, the government has planned the construction of a ship recycling yard on the island of Negros. The construction is financed by Japanese corporation Tsuneishi Heavy Industries Inc. The Platform is assisting representatives of local NGOs PDG and Save Hinoba-an Movement in halting the project, which currently involves land-grabbing of agricultural grounds and will negatively affect local communities, their livelihoods, as well as the coastal environment.





# GETTING THE LEGAL FRAMEWORK RIGHT

## WHAT IS THE ISSUE?

Under international environmental law, end-of-life vessels are considered hazardous waste. The export of hazardous wastes to developing countries from the EU is prohibited under the EU Waste Shipment Regulation. On 5 December 2019 the Basel Convention's Ban Amendment, which prohibits the export of hazardous waste, including end-of-life ships, from developed to developing countries became applicable at the international level. However, European and international law governing the trade of end-of-life ships is easy to circumvent for ship owners. Under the pretext of continued operational use or repair work, most ship owners do not declare their intent to dispose their vessels and thus escape from law enforcement.

The industry-driven International Maritime Organisation (IMO) adopted the Hong Kong Convention in 2009. It has so far not entered into force due to the lack of ratifications, and has been denounced for its weak standards by more than 100 global environmental and human rights organisations, the UN Special Rapporteur on Human Rights and Toxics, legal experts and European policy makers. 90 yards at the Alang beach in India already claim that they meet the requirements of

the Hong Kong Convention which does not ban beaching; does not regulate the downstream management of hazardous wastes; sets no standards for labour rights; and provides no independent certification and auditing scheme for the recycling facilities.

On 30 December 2018 the new EU Ship Recycling Regulation became applicable. The standard for safe and environmentally sound ship recycling set by the EU is an important step in the right direction.

## WHAT HAVE WE DONE?

### DEBUNKING FALSE INDUSTRY ARGUMENTS

The Platform published a report on the recycling capacity that is available on the EU List of approved ship recycling facilities in September 2018 together with member organisation Transport & Environment. As the application date for the EU Ship Recycling Regulation was approaching, the European shipping industry sought to undermine the Regulation by claiming that it could not become applicable without considerable recycling capacity added to the list. Their call was for the EU to accept facilities in Alang, India, under the false pretext that without those yards, EU flagged vessels would not have enough capacity available for their recycling. The industry push was

supported by Belgium and Greece and it became apparent that there was an urgent need to counter the fake news with reliable data. The Platform reviewed historic data on the breaking of EU flagged vessels and effectively showed that all EU flagged ships, both in terms of tonnage and size, could have easily been recycled at one of the 35 facilities that at the time were approved by the EU. Indeed, many of these sites are operating grossly under-capacity. The conclusions of the report were picked up by the press, enforcement authorities and Members of the European Parliament. This left the ship owners in quite an embarrassing position, and also convinced EU Commissioner Karmenu VELLA that there was no need to postpone the application date of the new law..

Today, the EU List has been expanded to include 41 approved ship recycling facilities. Whilst several Indian beaching yards have applied for approval, none of them have been able to prove that they meet the standards set by the Regulation.

### HOLDING INDUSTRY TO ACCOUNT FOR ILLICIT PRACTICES

The Platform has prompted several criminal investigations by EU enforcement authorities against shipping companies involved in the illegal export of end-of-life vessels to South Asia beaches.

## MILESTONE SEATRADE CASE

On 15 March 2018, the Rotterdam District Court sentenced, on the basis of the EU Waste Shipment Regulation, shipping company Seatrade for the intent to illegally export four vessels for scrapping in India.

Seatrade was heavily fined, and two of its executives were also banned from exercising the profession as director, commissioner, advisor or employee of a shipping company for one year. This decision was a major milestone in the Platform's campaign as, for the first time, a shipping company was held criminally liable for the illegal trade of end-of-life ships. The Prosecutor's request that the Seatrade executives face prison was only waived in light of this being the first time such criminal charges had been pressed. This ground-breaking judgement sets an important precedent for holding ship owners accountable for selling vessels, via shady cash-buyers, for dirty and dangerous breaking in order to maximise profits.

In January 2018, the Platform alerted Scottish Environmental authorities (SEPA), of the imminent illegal export of three floating rigs from the Cromarty Firth. The rigs had been sold to cash buyer GMS by Diamond Offshore. SEPA halted the movement of the platforms and pre-defined the cold-stacked rigs as hazardous waste. The units are currently still being detained, and are not able to leave Scotland unless the recycling destination is allowed under the EU Waste Shipment Regulation. The Platform also alerted local oil and gas trade unions of the case and has worked with National Union of Rail, Maritime and Transport Workers (RMT) to raise the issue of the decommissioning of floating oil and gas structures in both the Scottish Parliament and UK Parliament, demanding that the UK government develop a strategy for the safe and clean recycling of the North Sea structures.

In Norway, the HARRIER case is under investigation by the Economic Crimes Division of the police. The ship owner and cash buyer have been charged for their attempt to illegally export the vessel to Pakistan. The insurance company and Marine Warranty Surveyor are both under investigation for having aided the intended illegal export. Cash buyer Wirana has already been fined 7 million NOK (approx. 640.000 EUR), and the cases against both ship owner EIDE and Marine

Warranty Surveyor Aqualis Offshore are now scheduled to be heard by the Court. After having been detained in Norway for more than a year, the HARRIER was allowed to leave for recycling in Aliaga, Turkey. However, a major oil spill in the Izmir region caused by the vessel on its final voyage to the Turkish recycling yard led to the arrest of the ship. The HARRIER remained stuck at the Turkish recycling yard for more than one year as cash buyer Wirana simply "vanished" after having delivered the ship, dodging both the clean-up costs and fine issued by Turkish authorities. The recycling operations finally started in February 2020 – three years after the attempt to illegally export the vessel to Gadani, Pakistan.

The Platform is now engaging with also Europol and Interpol on 'illegal ship-breaking'. They aim at enhancing collaboration between different national police forces. To raise broader public awareness, the Platform has worked closely with investigative journalists focusing on specific cases of illegal exports of waste ships: Dutch investigative journalists published a damning report for offshore company SBM that sold a mercury contaminated tanker to Alang, India; BBC investigative journalists released their report on the illicit practices of Diamond Offshore and cash buyer GMS, as well as the connivance of local Indian authorities, in March 2020.





## MAKING BUSINESS DO THE RIGHT THING



Criminalising illegal conduct plays a key role in changing corporate incentive structures. Sufficiently high and dissuasive penalties, also for inciting, aiding and abetting offences need to be ensured. Within that scope, the liability of auditors, insurers and private certification schemes, should be explored and accounted for.

### FOCUS ON THE CIRCULAR ECONOMY

The Platform advocates for the adoption of incentives to facilitate a level playing field and increase the supply of ships to facilities with high environmental and safety standards. A return-scheme for ships where moneys are collected during operational life from all vessels trading in European waters has been proposed at the EU level and is supported by NGOs, trade unions and industry stakeholders. The use of green

bonds and inclusion of requirements to use sustainably recycled scrap steel originating from ships in public procurement would further encourage investments in high quality recycling.

To raise awareness on how to boost a toxic-free future in line with the Circular Economy, the Platform and its member organisation FIDH, organised in October 2019 two panel debates moderated by chief editor of MO\* Magazine. The UN Special Rapporteur on Toxics and Human Rights gave an opening key-note speech. Platform member organisation Basel Action Network (BAN) presented the Circular Economy and waste trade, before being joined on stage by the European Environmental Bureau (EEB) and the UN Special Rapporteur to discuss measures that will support the

transition to Circular Economy models. BELA and FIDH joined the Belgian Federal Police in a second debate that focused on corporate liability for toxic trade. The event was organised during the Brussels 15 Days for International Solidarity with the support of the City of Brussels, and included also the performance With Bare Hands LIVE.



*“Repeated legal calls in the importing countries are falling into deaf ears simply because the rich nations are declining to take care of their waste. While the EU has come forward with a set of rules, it is high time that the public agencies work to bridge the gap between laws and their implementation and save lives and the environment.”*

**Syeda Rizwana Hasan, Supreme Court Lawyer and Director of Bangladesh Environmental Lawyers Association**

## CALL FOR ACTION

We call upon the European Union to maintain high standards when publishing its list of approved ship recycling facilities and not to give in to shipping interests that want to continue earning dirty money by using the dangerous, polluting and

lowcost method of beach-breaking. We also call upon the Member States to support the introduction of a financial scheme based on the polluter pays principle that would incentivise ship owners to opt for a ship recycling facility on the EU list.

## WHAT IS THE ISSUE?

The vast majority of ship owners do not take responsible decisions when getting rid of their old ships. Instead, they sell their vessel to scrap dealers known as cash buyers. These companies offer ship owners the highest price – upfront and in cash – for end-of-life vessels. They will manage the ship on its last voyage, as well as rename and reflag it, often to the worst performing flags in the world, as part of their business model.

Registering also the ships under anonymous post box companies, it becomes challenging for authorities to hold cash buyers accountable for their illicit business practices. Ship owners will claim that their responsibility ends upon concluding a deal with a cash buyer, and thus seek to avoid any financial, liability or reputational risks linked to the scraping of their vessels at the increasingly criticised beaching yards.

Selling to a cash buyer has, however, become increasingly difficult to use as a pretext for not knowing that the asset will be scrapped. The higher price offered by the cash buyer is also a clear indication of where the vessel will be scrapped.

Ship owners' lack of due diligence when selling to cash buyers is increasingly highlighted by law enforcers and the financiers of shipping.

Companies globally are increasingly expected to make sure that their business, including their supply chain management, operate in line with international human rights standards and does not cause harm to the environment. Faced with this demand – and often with a much more public profile than most ship owners – banks, pension funds and consumer brands, upon which international shipping depends, are taking steps to ensure responsible ship recycling.

## WHAT HAVE WE DONE?

### PROMPTED ENGAGEMENT FROM FINANCIERS

Profits made on the back of people and the environment are not acceptable with the slowly increasing focus on environmental, social and governance criteria for investments. Through what is known as “negative screening”, investors are using the annual lists that the Platform publishes on global dumpers to screen their asset values.

## MILESTONE INVESTORS DIVESTING

In January 2018, the Norwegian Central Bank decided to exclude four ship owners, including Evergreen, from the Government Pension Fund Global (GPF), the world's largest sovereign fund. The exclusion was made public and with written explanations. Both the breach of international human rights and the severe environmental damage caused by beaching were highlighted as reasons for the divestments. According to the Council on Ethics of GPF, selling a vessel to a beaching yard via a cash buyer “is a consequence of an active choice on the part of the company that owned the vessel to maximise its profit. In the Council's opinion, that company must shoulder an independent responsibility for doing so. There are better ways of dismantling ships that are readily available to the ship owner, but these are more expensive”. This precedent-setting divestment was followed by Norwegian pension fund KLP that excluded the same companies. Both investors have signalled that they may take further action on companies that break their vessels also in India.





#### ENSURED ENGAGEMENT FROM MARITIME INSURERS

Following investigations in Norway on the possible criminal liability of insurance companies in aiding illegal waste trafficking, the Platform has been solicited to present the shipbreaking issue to the insurance sector. In June 2019 the Platform spoke at an event organised by the largest P&I ship insurer, Gard. Underwriters, brokers and shipping companies were present, and co-presenters on the ship recycling issue included DNB bank, Wilhelmsen shipping company and a shipping lawyer. Jointly, all presentations offered strong arguments for sustainable ship recycling from an environmental, labour rights, legal, financial and ethical point of view. In September 2019, the Platform was invited to speak at the Annual Conference of the International Union of Marine Insurers (IUMI) in Toronto, Canada. IUMI represents more than 40 national marine insurance and reinsurance associations, and through their respective memberships cover more than 90 per cent of the world's marine insurance premium. Following the conference, the Platform has been contacted by several insurance companies for advice on how they can contribute to raising the standards of ship recycling. IUMI further announced that ship recycling would be one of their future focus areas with regards

to screening their business up against Environmental, Social and Governance (ESG) issues.

#### HIGHLIGHTING EMERGING CHALLENGES

With the oil and gas sector seeing a downturn since 2014, the Platform has documented an increasing number of offshore units sold for scrap. More than 200 floating oil and gas structures have been documented by the Platform as scrapped globally since 2015 – an estimated 40% of these assets ended up on South Asian beaches, where they were broken up under conditions that cause irreparable damage to the coastal environment and put workers' lives and health and safety at risk. Mercury and radioactive contamination are of particular concern on so-called floating production and storage units.

The Platform published a report on the decommissioning of floating oil and gas structures that have operated in the North Sea. These units are effectively covered by the EU Ship Recycling Regulation and / or the EU Waste Shipment Regulation. The report outlines clear indicators for when assets in the North Sea are likely to be decommissioned and identifies solutions for their safe and environmentally sound recycling. The report was launched during an event hosted by pension fund KLP in Oslo.

So far, the only structure which operated in the North Sea and has been traced to a South Asian beaching yard is the FPSO NORTH SEA PRODUCER. The Platform has, however, revealed that units operating in East Asia have been sold for scrapping to the beaching yards with false inventories claiming that they are free of mercury contamination. With support from the Royal Academy of Engineering and Lloyds Register Foundation, the Platform will continue to focus on the particular end-of-life challenges of the oil and gas sector.

#### FOCUS ON BRAZIL

Also in Brazil there is an increasing inventory of oil and gas units that will need to be decommissioned in the coming years. Via presentations at conferences on ship recycling and offshore decommissioning organised by SOBENA in Rio de Janeiro, the Platform has engaged with Brazilian ship recycling yards, environmental authorities and major shipping and oil & gas companies such as Petrobras and Vale. The aim has been to enhance awareness on the issue in Brazil, where several yards could potentially meet the EU standard and recycle regional tonnage in a sustainable manner. Currently, Brazilian companies are selling their obsolete tonnage for breaking on the beaches of South Asia. The Platform has alerted Brazilian environmental

authorities on the export of three tankers owned by Petrobras that were exported to India in breach of UNEP's Basel Convention, and also in relations to the auctioning of the French aircraft carrier Clemenceau's sister ship, the SÃO PAULO. In the latter case, and due to the large amounts of asbestos still on-board, the Platform has effectively worked with the global Ban Asbestos Network and urged both French and Brazilian authorities to ensure the proper dismantling of the vessel in an EU approved facility.

#### FOCUS ON HUMAN RIGHTS DUE DILIGENCE

The Platform has engaged with the UN Special Rapporteur on Human Rights and Toxics, as well as NGOs, lawyers and researchers that focus on corporate accountability. These exchanges have brought valuable insights in other sectors, such as coco-farming and textiles, that also face similar problems with regards to poor conditions and weak auditing schemes that are not able to detect violations, in some cases even designed not to detect violations as a way of hiding exploitation. The EU Ship Recycling Regulation provides in that sense for a strong case of EU auditing practices in third countries and could be used as an example to follow in also other sectors and supply chains. In light of the Platform's successes in prompting criminal investigations, the

Platform was also asked to share its experiences working on human rights corporate liability at events organised by Amnesty International and partner organisation European Coalition for Corporate Justice (ECCJ).

#### RECOGNISING BEST PRACTICE

Recycling vessels sustainably is possible. In 2019, the NGO Shipbreaking Platform commended Dutch ship owner Van Oord for best corporate practice. Van Oord sold its end-of-life ships to EU-listed yards for recycling and has had a long-standing commitment to safe and clean ship recycling. Other companies that have had a sustainable ship recycling policy in place for many years include Boskalis, CSL, Deme Group, Grieg Star, Hapag Lloyd, Heerema, Jan de Nul, Samskip and Wallenius Wilhelmsen.

#### WORST SHIP-DUMPING COMPANIES

2018  
**SINOKOR**

11

2018  
**NORDIC AMERICAN TANKERS**

8

2019  
**EVERGREEN**

11

2019  
**BERGE BULK**

4

## CALL FOR ACTION

We call upon ship owners globally to use modern industrial ship recycling facilities - off the beach - that can ensure clean and safe practices in line with international environmental and labour rights' standards. We expect shipping companies to exercise due diligence and use the upcoming European

list of ship recycling facilities. We also call on cargo owners and the financers of shipping to demand clean and safe ship recycling from the ship owners they do business with by including contractual clauses that require the use of ship recycling facilities on the EU list.



# EXPOSING FACTS, INFORMING STAKEHOLDERS: OUR OUTREACH IN THE PRESS AND ON SOCIAL MEDIA

## PRESS HIGHLIGHTS



VICE MARCH 2018



THE ECOLOGIST OCTOBER 2018



SCMP OCTOBER 2018



THE INDEPENDENT FEBRUARY 2019



THE ECONOMIST MARCH 2019



FRANCE 2 JUNE 2019



ZEMBLA SEPTEMBER 2019



SRF OCTOBER 2019



TV 4 NOVEMBER 2019



## PERFORMANCE: WITH BARE HANDS LIVE

With Bare Hands LIVE is a performance in which live music, video, and the testimonies of the people directly affected by one of the most dangerous industries in the world are combined to

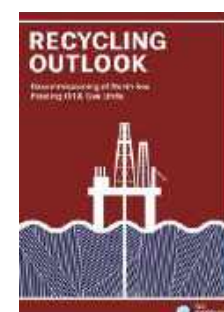
create a unique narrative experience. With Bare Hands LIVE, created by graphic designer Isacco Chiaf in collaboration with Medeber Teatro, gives the web-documentary With Bare Hands a new dimension. In 2019, the Platform supported the realisation of the performance in different venues and events in Belgium, including the festival 15 Days for International Solidarity organised by the City of Brussels.



*This work casts a light on a virtually hidden human and environmental tragedy. At every performance, my hope is for even just one member of the audience to open their eyes to the deadly dynamics of our profit-based society and decide to do whatever is in their power to challenge them.*

**Serenella Martufi, Medeber Teatro**

## RECENT PUBLICATIONS







## A VIBRANT GLOBAL NETWORK ORGANISATIONAL DEVELOPMENT

The NGO Shipbreaking Platform is a coalition of 18 environmental, human and labour rights organisations. The Platform's Board Members include international experts in a wide range of sectors related to maritime policies, environmental law and occupational health. For more than 15 years, we have been fighting for shipbreaking workers' right to a safe job, the use of best available technologies, and for an equally protective environmental standard globally.

On the 1-2 October 2019, the Platform held its Annual General Meeting (AGM) in Brussels, Belgium. During the AGM, the Platform's Secretariat, Board Members and representatives of the Platform's member organisations outlined strategic campaign objectives to ensure that the Platform's activities continue to be an important catalyst for change.

### PARTNERING WITH NGOS WORKING ON SUSTAINABLE SHIPPING

The Platform has ensured that ship recycling is included in sustainable shipping life-cycle assessments. Working closely with member organisations Bellona and Transport & Environment, as well as with partner

Surfrider Foundation, the Platform has provided input to standards up against which the shipping industry's environmental performance should be evaluated.

### FOCUS ON BANGLADESH

The LIFEBOAT project, which was supported by the US State Department came to an end in 2019. With the support of the Royal Academy of Engineering and Lloyds Register Foundation, the Platform will continue its collaboration with NGOs on the ground in Bangladesh and will aim at further raising awareness of the detrimental impacts the shipbreaking sector in Chattogram has on workers' health and safety, local communities and the coastal environment.

### DEFENDING PUBLIC INTEREST ACTIVITIES

The Platform has played an active role in bringing cases of illegal exports of vessels and substandard shipbreaking practices to the attention of both authorities and the financiers within the shipping industry. In an attempt to intimidate critical civil society voices and drain the Platform's resources, one of the largest cash buyers, involved in at least two of the cases that are being criminally investigated in the UK, has

filed a typical Strategic Lawsuit Against Public Participation (SLAPP) case against the Platform. The cash buyer is claiming 12.5 million USD (and a public apology) for reputational damage. In light of this abusive civil lawsuit, the Platform has consulted and received support from lawyers globally that have expertise on corporate accountability and the defense of public interest activities. The Platform is furthermore engaging with NGOs at the EU level to ensure new legislation aimed at protecting journalists, activists and whistle-blowers from SLAPP.



*"It was a pleasure to participate in the AGM 2019. A great opportunity to enhance the collaboration with all Platform's members."*

*Mark Preston Aragones, Bellona Europa*

## FINANCIAL STATEMENT

INCOME	2018	2019
Membership fees and members' contributions	7.700	10.050
Fonds Maribel Social	40.000	40.678
European Commission LIFE Programme	135.451	144.108
US Bureau of Democracy, Human Rights & Labor	31.339	5.815
Donations	25.864	35.600
Other / Travel reimbursement	9.039	8.836
<b>TOTAL INCOME</b>	<b>249.393</b>	<b>245.087</b>
EXPENDITURE	2018	2019
<b>ACTIVITIES</b>		
Annual General Meeting	786	14.798
Other Travel Costs	15.403	15.397
Communication Material	6.478	11.165
Public Awareness and Data Collection in South Asia	17.444	25.933
<b>SUB-TOTAL ACTIVITIES</b>	<b>40.112</b>	<b>67.294</b>
<b>STAFF</b>		
Salaries and social charges	174.991	146.242
Other Salary costs	2.445	4.798
<b>SUB-TOTAL STAFF</b>	<b>177.437</b>	<b>151.041</b>
<b>GENERAL COSTS</b>		
Rent and Office costs	5.485	6.164
Communication costs	11.405	12.128
Other costs	7.910	5.636
<b>SUB-TOTAL GENERAL COSTS</b>	<b>24.800</b>	<b>23.928</b>
<b>TOTAL EXPENDITURE</b>	<b>242.348</b>	<b>242.263</b>
<b>INCOME LESS EXPENDITURE</b>	<b>7.045</b>	<b>2.824</b>
Reserves - beginning of the year	3.102	10.147
<b>RESERVES - END OF THE YEAR</b>	<b>10.147</b>	<b>12.971</b>



# WHO WE ARE



- INGVILD JENSSEN**  
Founder and Director
- NICOLA MULINARIS**  
Communication and Policy Officer
- TEG MALLA**  
Partnerships Manager (as of 2020)
- SARA COSTA**  
Project Officer
- MARTINE MØRK**  
Research Assistant (Sept 2018 - Apr 2019)

## BOARD MEMBERS

The NGO Shipbreaking Platform's board members are international experts in a wide range of sectors related to maritime policies, waste management, environmental law and occupational health and safety. Their experience and know-how contribute immensely to the Platform's activities and successes.

**Martin Besieux** has been campaigning for a toxics-free environment for almost thirty years. After working for the Belgian Environmental Federation of Environmental Citizens' Organisations, Martin joined Greenpeace as a Toxics Campaigner in 1984. Martin has recently retired and serves as an independent board member to the NGO Shipbreaking Platform.

**Ritwick Dutta** is a leading environmental lawyer practicing in the Supreme Court of India since 2001. Ritwick is the founder of the Legal Initiative for Forest and Environment (LIFE) in New Delhi, an organisation based on the concept of "environmental democracy". LIFE has obtained landmark decisions in the courts on various environmental issues.

**Sigurd Enge** has a maritime background as a navigator and captain in the fishing

fleet. He joined the Bellona Foundation in 1988 and has worked on various maritime issues including aquaculture, shipping, and marine pollution. Currently, he is in charge of Bellona's work with the shipping industry as well as environmental challenges in the Arctic.

**Robert Evans** is a former British Member of the European Parliament (1999-2008) where he chaired the South Asia Delegation and actively dealt with the shipbreaking issue. He now works as a local Councillor and supports several NGOs with his special expertise on Bangladesh.

**Sayed Rizwana Hasan** advocate at the Supreme Court of Bangladesh and the Director of the Bangladesh Environmental Lawyers Association (BELA), has initiated landmark rulings on the shipbreaking industry. She was able to forestall the import of toxic end-of-life vessels to her country. She received the prestigious Goldman Prize 2009 for her work on shipbreaking, as well as the Ramon Magsaysay Award 2012.

**Dr Muhammad Irfan Khan**, Professor of environmental science, is the Chairman of the Department of Environmental Science at International

Islamic University, Islamabad. He obtained his PhD degree from London University and was awarded a post-doctoral fellowship at Oxford University. He is qualified as an Environmental and Occupational Health and Safety Auditor.

**Helen Périvier** is a qualified navigation officer and has ten years of experience serving on ships as a maritime professional and in environmental research, advocacy and education tours. She successfully led the Greenpeace campaign on the European REACH chemicals legislation and has been working on the shipbreaking issue for more than a decade. She is one of the five founding members of the Platform.

**Jim Puckett** has been an environmental health and justice activist for 25 years. He is the founder of Earth Economics and the Basel Action Network (BAN). He has represented civil society at the Basel Convention since its inception in 1989 and has seen major traction with developing countries refusing the import of hazardous waste from industrialised countries. Jim is one of the five founding members of the Platform.

## MEMBER ORGANISATIONS

**Basel Action Network (BAN)** is focused on confronting the excesses of unbridled free trade in the form of "Toxic Trade" and its devastating impact on global environmental justice. It promotes sustainable and just solutions to our consumption and waste crises. Based in Seattle, USA.

**Ban Asbestos** is a network of local organisations monitoring anti-asbestos legislation where it exists and litigating for the abolition of asbestos where anti-asbestos legislation is lacking. Based in Paris, France.

**Bangladesh Environmental Lawyers Association (BELA)** is a true pressure group against environmental violations and is considered a pioneer in public interest environmental litigation (PIEL). Based in Dhaka, Bangladesh.

**The Bellona Foundation** is a recognized technology and solutions oriented environmental defender. Altogether, some 40 ecologists, nuclear physicists, engineers, economists, lawyers, advisors and journalists support its objective. Based in Oslo, Norway.

**Bangladesh Institute of Labour Studies (BILS)** is part of the labour movement and facilitates the links between trade unions and other civil society organizations. Established in 1995, it has the support and active participation of the major National Trade Union Federations. Based in Dhaka, Bangladesh.

**The Center for the Rule of Law - Islamabad (CROLI)** is a volunteer organization promoting a better understanding of the rule of law and human rights. Founded by former Judge Muhammad Majid Bashir, CROLI conducts legal seminars. Based in Islamabad, Pakistan.

**The Corporate Accountability Desk - The Other Media** coordinate a corporate accountability and environmental health desk that extends technical, logistics, legal and strategic support to communities that are fighting corporate crime. Based in Cuddalore, India.

**The European Federation for Transport & Environment** is Europe's principal environmental organisation campaigning on sustainable transport. T&E's primary focus is on European policy and its work is supported by 45 NGO member organisations working in 21 countries to promote an environmentally sound approach to transport. Based in Brussels, Belgium.

**The International Federation for Human Rights (FIDH)** includes 141 national human rights NGOs from all regions of the world. FIDH has a generalist mandate and consequently works on all human rights be they civil, political, economic, social, or cultural rights. FIDH carried out fact-finding missions on shipbreaking in India and Bangladesh. Based in Paris, France.

**The International Ban Asbestos Secretariat (IBAS)** is an independent body dedicated to the world-wide eradication of the continuing use of asbestos and the minimisation of dangers from asbestos products already within society. Based in London, UK.

**Legal Initiative for Forest and Environment (LIFE)** comprises of groups of lawyers working on issues of environmental democracy. It aims at creatively using the existing legal framework and institutions in protecting areas of vital ecological importance. Based in New Delhi, India.

**Legambiente** is a non-profit association created in 1980 for the safeguard of the environment and for the promotion of sustainable lifestyles, production systems and use of resources. It is the most widespread environmental organization in Italy with over 115.000 members and over 2 million people involved in volunteer activities and campaigns. Based in Rome, Italy.

**The North Sea Foundation** is a Dutch environmental NGO that searches for alternative solutions and seeks dialogue with decision makers. In 2002, the North Sea Foundation launched the 'Clean Ship' concept, which is a strategy towards zero-impact shipping. Based in Utrecht, the Netherlands.

**The Bangladesh Occupational Safety, Health and Environment Foundation (OSHE)** is a specialized labour foundation established in 2003 by workers initiative working on issues affecting employment, income, economy and environment and the livelihoods of working people. Based in Dhaka, Bangladesh.

**Prevention of Hazardous Shipbreaking Initiative** is a coalition of environmental and labour rights NGOs based in Turkey. The group focuses on proper waste management and respect of labour rights at the shipbreaking sites in Aliaga, near Izmir. Based in Izmir, Turkey.

**Sustainable Development Policy Institute (SDPI)** is an independent, non-profit premier research organisation founded in August 1992 on the recommendation of the Pakistan National Conservation Strategy (NCS). It focuses on sustainable development, globalisation, environment, education, health, trade, and has incorporated emergency work and rights-based work. Based in Islamabad, Pakistan.

**Toxics Link** is an Indian NGO working together for environmental justice and freedom from toxics. Based in New Delhi, India.

**Young Power in Social Action (YPSA)** is a social development organisation that promotes sustainable development. YPSA follows the issues related to workers rights, tries to obtain improved working conditions at Chittagong shipbreaking yards and does advocacy for a policy to ensure human rights in the shipbreaking industry. Based in Chittagong, Bangladesh.

## PARTNER ORGANISATIONS

**European Coalition for Corporate Justice (ECCJ)** With 21 member groups who represent over 250 organisations from 15 countries, the **European Coalition for Corporate Justice (ECCJ)** is the only European coalition bringing together European campaigns and national platforms of NGOs, trade unions, consumer organisations and academics to promote corporate accountability. Based in Brussels, Belgium.

**The European Environmental Bureau (EEB)** works to promote environmental issues on a European and global level and represent the demands of European citizens. Set up in 1974, the EEB is Europe's largest coalition of grassroots environmental organisations. They represent more than 140 member organisations from 31 countries with a membership base of more than 15 million individuals/households. Based in Brussels, Belgium.

**The Environmental Justice Organisations, Liabilities and Trade (EJOLT)** project is an FP7 project supported by the European Commission. The project supports the work of Environmental Justice Organisations.

**The Human Rights at Sea (HRAS)** initiative has been independently developed for the benefit of the international community, including the maritime industry, for matters concerning explicit engagement with human rights issues in the maritime environment. Based in London, United Kingdom.

**IIKJ (NIK) - Ikki-Ikki Asia Japan** (Ningen-Ikki Ikki-kengkukwai) is a community based network of volunteers based in the Yamaguchi prefecture of Japan. Ikki-Ikki is a socially engaged group of people that deal with issues related to sustainable development, environmental protection, social justice and peace.

**Istanbul Health and Safety Labor Watch (IHSLW)** Meclisi was established in March 2011 in Istanbul, Turkey, as an intra-professional and independent monitoring network / platform, faced with serialised fatal workplace accidents in almost all the sectors of the Turkish economy.

**The MEDITERRANEAN SOS Network (Med-SOS)** is a Greek non-profit and non-governmental organisation, dedicated to protecting the environment and promoting sustainable development at the national and Euro-Mediterranean level since 1990. Based in Athens, Greece.

**Surfrider Foundation Europe** is a non profit organization, dedicated to defending, saving, improving and managing in a sustainable manner the ocean, coastline, waves and the people who enjoy them.





# WE NEED YOUR SUPPORT TO FULFILL OUR MISSION!

The NGO Shipbreaking Platform wishes to thank its funders, Board of Directors, Members and Partners and individuals that have supported our work in 2018-2019 beyond. With your support we have been able to reach some of the important milestones of our campaign!

The good news is that the technology to take apart ships on stable and contained platforms is ready and waiting. All ships should carry an Inventory of Hazardous Materials, but, the long view of ship recycling comes around to how ships are built in the first place. Green ship design reduces the hazardous materials in new-builds and minimises waste by planning for efficient dismantling in the future. Transition to dry-docks and a circular cradle-2-cradle approach to ship design could provide new opportunities in former ship

building regions that have experienced downturns, and spur innovations in ship design and building so that vessels can also minimise emissions during operational life. With many vessels expected to head for scrapping now, it is urgent to act.

To ensure that safe and clean ship recycling becomes the norm, and not the exception, the Platform will continue to inform policy makers, financial and corporate leaders, as well as researchers and journalists. With a broad base of support both in orientation and geographically, including membership in ship owning as well as shipbreaking countries, the Platform plays an important role in promoting solutions that encompass the respect of human rights, corporate responsibility and environmental justice. Will you join us?

If you share our vision please **DONATE** or contact us to find out how we can work together





## SECRETARIAT

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