



NGO
SHIPBREAKING
PLATFORM



IMPACT
REPORT

2020
2021

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.

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.

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.

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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EDITORIAL



The NGO Shipbreaking Platform wishes to thank its funders, Board of Directors, Members and Partners and individuals that have supported the coalition's work in 2020 and 2021. With your backing we have been able to reach some of the important milestones of our campaign!

Working closely with investigative journalists, we have been able to reveal the harm caused by irresponsible shipbreaking. The harsh reality is that the vast majority of ships, many owned by European, East Asian and US companies, still end up on the beaches of India, Bangladesh and Pakistan. Workers are killed, impaired for life, exposed to toxics that cause cancers, and sensitive coastal environments are devastated.

The good news is that the illegal and exploitative trade of toxic ships is now a recognised environmental crime. Enforcement authorities, including Europol and Interpol, have increased knowledge of how ship owners circumvent the law, and criminal investigations have been launched in several countries. The upcoming review of the European Ship Recycling Regulation offers an opportunity to introduce incentives that can ensure better enforcement. Ways to internalise the costs of responsible end-of-life management with those that have benefitted from the asset during its operational life will be key. Introducing a return-scheme for ships and linking tax benefits to environmental and social performance are two possible examples.

The good news is also that the technology to take apart ships on stable and contained platforms is ready and waiting. Innovative thinking, which integrates human values with life cycle management, including the design phase, is furthermore charting a new course towards ethical circularity. 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 and re-use in the future. Transition to dry-docks and a circular cradle-to-cradle approach to ship design can provide new opportunities in former ship building regions that have experienced downturns, and spur innovations in ship design and building so that vessels can minimise emissions also during operational life.

With many vessels expected to head for scrapping soon, it is imperative to act quickly. Breaking the global fleet on the beaches of India, Bangladesh and Pakistan causes irreversible damage to workers and the environment. This is no longer acceptable, especially when solutions exist.

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. Greenwashing incremental changes on tidal beaches is not the right way forward. Making sure ship demolition,

design, waste management and material recovery generate safe working environments that contribute to preserving our natural capital is. With a broad base of support both in orientation and geographically, including membership in ship owning as well as shipbreaking countries, the Platform will advocate for solutions that encompass the respect of human rights, corporate accountability and environmental justice.

In September 2022 we are going to host our first Ship Recycling Lab, where we join forces with forward-thinking companies that have developed innovative solutions, including new cutting techniques, state-of-the-art waste handling procedures, and clean steel breakthrough systems aimed at achieving a zero-carbon steel-making process. The Lab will bring together leaders from the maritime, recycling and steel sectors to exchange ideas for best practices in line with ethical circular policy goals. We aim to set the standard for tomorrow's ship recycling and showcase that a shift towards a truly sustainable ship recycling sector is possible!

Ingvild Jensen,
Executive Director and Founder, NGO Shipbreaking Platform

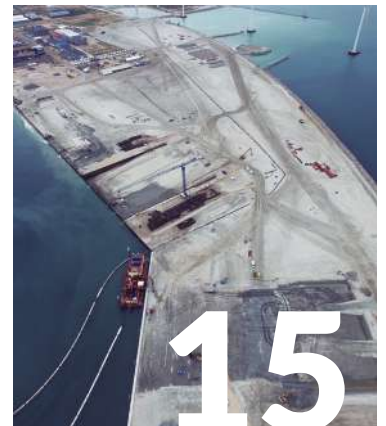


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WHAT IS THE PROBLEM?

Just as the goods they transport, ships also 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 end-of-life ships, as it ensures the reuse of valuable resources such as steel. However, today the vast majority of ships continue to be broken under conditions that pollute and expose workers to immense risk.

Vessels are grounded deliberately during high tide on the beaches of Alang in India, Chattogram in Bangladesh and Gadani in Pakistan. Breaking operations usually take place under rudimentary conditions and during low tide (i.e. when the ship is not submerged by the sea). Due to the lack of adequate infrastructure, equipment and procedures to prevent accidents and pollution, the human and environmental toll of the shipbreaking activities on these beaches is devastating.

Appallingly shipping companies exploit the minimal enforcement of environmental and safety rules in South Asia to maximise profits and earn millions more of USD by selling their obsolete vessels to the beaching yards, where vulnerable workers, local communities and fragile ecosystems pay the price of dirty and dangerous scrapping.

DIRTY PRACTICES

Despite international law banning the export of hazardous waste to developing countries, millions of tons of toxic substances are exported to South Asia in the form of end-of-life vessels each year. Ships contain numerous hazardous materials such as asbestos, Polychlorinated biphenyl (PCBs), oil residues and heavy metals. Unless these materials are properly removed during cutting operations, and then safely sorted and disposed of, there is a risk of exposure and harm to both workers' health 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 will wash away debris, paint chips and oil spillages. In fact, the pollution and uprooting of coastal vegetation, including protected mangrove forests, has rendered the shipbreaking beaches toxic hotspots, endangering the biodiversity of the coastal areas and destroying the livelihoods of local communities.

As the hazardous substances built into the structure of the vessels are rarely identified workers are harmed unknowingly. In addition, large amounts of hazardous materials are not disposed of in a safe and environmentally sound manner as they are either illegally dumped or resold in local markets, and thus, continue to harm surrounding local communities. The shipbreaking

industries in Bangladesh and Pakistan remain completely deprived of hazardous waste treatment and storage facilities, and in India, it remains legal to re-sell asbestos-contaminated materials. The beaching yards are set up without proper environmental impact assessments and they continue to operate without being subject to thorough environmental monitoring.

DANGEROUS PRACTICES

Shipbreaking is a heavy and hazardous industry and, according to the International Labour Organisation (ILO), it is one of the most dangerous jobs in the world. When conducted on tidal beaches, without proper infrastructures to allow for rapid emergency response and the safe use of heavy lifting cranes, the risks workers are exposed to are many. On the South Asian beaches, untrained 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.

Each year, suffocation, explosions, fall from great height and the crushing down of heavy steel plates causes death or serious injury to numerous workers. Since 2009, the Platform and its local members have documented more than 400 fatalities at the beaching yards. Yet, in the vicinity of the shipbreaking beaches there are no



hospital facilities capable of providing the adequate medical assistance to severely injured workers. Due to the lack of transparency in the industry, it is expected that the actual number of workers that have been killed or harmed at the yards is much higher. Many more workers suffer, or will suffer, from occupational diseases, including cancer and asbestosis, years after having been exposed to toxic fumes and substances at the shipbreaking yards, adding to the industry's death toll.

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 and work long hours without holidays. Additionally, trade unions are prevented from effectively organising them. Despite both an international and national banning of the employment of children in hazardous industries, such as shipbreaking, 13 percent of the workforce in Bangladesh are estimated to be between 15 and 17 years old.

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 to South Asia. Ship owners obtain the highest price, upfront and in cash, for their end-of-life vessel when selling to a cash buyer. The price obtained for an end-of-life vessel is a clear and primary indicator of its final scrapping destination, and, currently, the highest prices are offered by the least environmentally-friendly yards.

The cash buyers will typically change the registration, flag and name of the vessel on its final voyage. Hiding behind post-box companies and flags known for their poor implementation of international maritime law, such as Comoros, Palau and St Kitts and Nevis, ship owners attempt to avoid any legal or reputational risks linked to the increasingly criticised beaching yards. The use of concealed corporate structures furthermore renders it is extremely challenging for authorities to trace and hold ship owners and cash buyers accountable for 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

The Platform's vision is to ensure that the costs of responsible and ethical recycling are internalised so that ship recycling no longer causes harm to workers, communities or the environment, and to bring about the design and building of toxic-free vessels.

Clean and safe methods for ship recycling are already available. The upcoming revision of the European Union's (EU) Ship Recycling Regulation and the new policy priorities aimed at reducing greenhouse gas emissions, enhancing green jobs, and increasing access to valuable raw materials (e.g. scrap steel), can furthermore boost a shift towards more sustainable solutions for both ship recycling and ship building.

Innovative cutting techniques, new state-of-the-art waste handling procedures, cradle to cradle concept-designs, and clean steel breakthrough technologies aimed at achieving a

zero-carbon steel making process, all provide solutions for enhanced protection of workers and the environment.

Several newly established facilities are using dry docks to ensure that vessels are recycled under similar conditions to those under which they were built, maintained and repaired throughout their operational life: in fully contained industrial sites with the help of heavy lifting machinery. Ultimately, a collaborative approach between civil society, researchers, progressive industry stakeholders, technological innovators, financiers and policy makers is the only way to ensure a radical shift towards a truly ethical circular economy.



“The many risks involved in taking apart large vessels that contain numerous toxics within their structure need to be managed at sites that can protect workers, safely use heavy lifting cranes, contain pollutants and dispose of hazardous materials in line with international waste laws. It is unacceptable that these risks are simply exported to workers and the environment in the Global South, especially when ownership of these end-of-life assets is in places like Hamburg, Athens, Copenhagen, London and Antwerp.”

Ingvild Jenssen, Executive Director and Founder, NGO Shipbreaking Platform

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



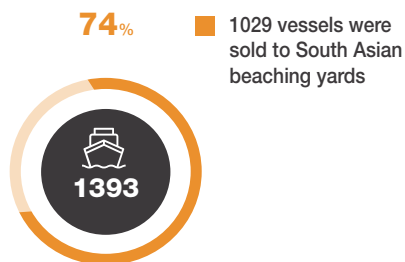


THE GLOBAL SHIPBREAKING CRISIS

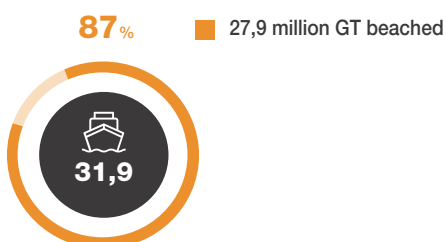
FACTS & FIGURES

TOTAL

NUMBER OF SHIPS DISMANTLED WORLDWIDE



GROSS TONNAGE (MILLION) DISMANTLED WORLDWIDE



Each year the Platform collects data and publishes an annual list of ships dismantled worldwide. In 2020 and 2021, 1393 vessels were dismantled, 1029 of these ships were sold for dirty and dangerous breaking on the beaches of South Asia, amounting to near 90% of the gross tonnage dismantled globally. Whilst ship owners are increasingly portraying themselves as conscious of the problems caused by shipbreaking, the Chattogram shipbreaking yards in Bangladesh, where environmental protection and occupational health and safety standards are particularly dire, remained the preferred scrapping destination worldwide in terms of tonnage dismantled.

Vessels scrapped in 2020 and 2021 included large tankers, passenger ships, bulkers, floating platforms, cargo, and passenger ships. Looking at the size of vessels scrapped on the beaches of South Asia, Pakistan and Bangladesh received the largest vessels, while Indian yards scrapped more medium-sized ships. 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. Whilst Turkey tends to recycle smaller vessels on average, several large passenger ships ended up in Aliaga as the cruise sector was severely hit by the Covid-19 pandemic.

Ship owners from Greece and the United Arab Emirates (UAE) were

responsible for the highest number of ships sold to South Asian shipbreaking yards in 2020 and in 2021 respectively. Greek ship owners beached 48 vessels in 2020, UAE owners beached 60 in 2021. Since the Platform's first data gathering in 2009, Greek shipping companies have unceasingly topped the list of owners that opt for dirty and dangerous shipbreaking.

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. In 2020 and 2021, 271 European vessels were beached in South Asia, whilst only a minor fraction of the European capacity for ship recycling was utilised, with merely 37 vessels recorded being recycled in EU-approved facilities. At least 41 vessels that had been operating under a European flag swapped to a non-European flag just weeks before reaching the beach, in an attempt to circumvent the EU Ship Recycling Regulation. The most popular end-of-life flags for vessels scrapped on the beaches in 2020 and 2021 were Comoros, Palau and St Kitts and Nevis, so-called flags of convenience known for their poor implementation of international maritime law.

The EU controls 40 % of the world operational fleet. Thus, it has a particular responsibility to find solutions to the shipbreaking crisis



and reverse the trend of unsustainable scrapping. Legislation based on flag state jurisdiction alone, such as the EU Ship Recycling Regulation, will not be successful in shifting the industry towards better practices. The Platform is calling for incentives that incorporate the polluter pays principle, including a return-scheme for ships collected at ports during operational life to ensure better enforcement of existing legislation.



“Whilst European shipping companies own 40% of the world fleet, only 5% of end-of-life ships were registered under an EU/EFTA flag in 2020. Flags known for their poor implementation of maritime law have always been particularly popular at end-of-life. Ship owners hiding behind anonymous post box companies set up by cash buyers and backed by blacklisted flag registries is a reality that begs for the introduction and enforcement of measures that effectively hold the real beneficial owners of the vessels responsible.”

Ingvild Jenssen, Executive Director and Founder, NGO Shipbreaking Platform

EFFECTS OF THE PANDEMIC

Whilst the Covid-19 pandemic pushed especially many cruise vessels to the scrap yards, it also affected workers globally, including those employed in the shipbreaking sector in South Asia. The lockdowns caused a massive decline in activity in especially Bangladesh and India, and most of the workforce there was left without salary. The fact that workers were not paid and did not receive support during the Covid-19 lockdowns showcases the shipbreaking workers' complete lack of safety net, both from employers' and the government.

Deprived of accessing the government support offered to local workers, migrant shipbreaking workers in Bangladesh were unable to return to their home villages due to public transport being shut down. Forced to pay rent for the unsanitary and improper accommodation near the shipbreaking yards, the migrant workers, mainly from the

Northwest of Bangladesh, were left to starve.

This unprecedented emergency situation prompted the Platform to set up a donation campaign. Thanks to the financial support received, our local member organisation Bangladesh Occupational Safety, Health and Environment Foundation (OSHE Foundation) managed to distribute food and personal protective equipment items to 130 of the most deprived shipbreaking workers and their families.



MONITORING THE PROBLEMS OF SHIPBREAKING IN INDIA

WHAT IS THE ISSUE?

The beach in Alang in 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. Yet, the conditions in Alang remain deplorable as revealed by the Platform, independent journalists, including the BBC in 2020, and researchers that have been able to visit the yards despite access becoming increasingly challenging.

Recent audits by the European Commission in Alang and media reports continue to flag serious concerns related to pollution of the intertidal area: absence of medical facilities, breaches of labor rights, and lack of capacity to safely manage several hazardous waste streams (e.g., mercury and radioactive contaminated materials that are typically found on offshore oil and gas units). In addition, asbestos contaminated materials can be resold in India and no proper disposal site for PCBs has been established.

Despite repeated attempts to obtain official statistics, no information on accidents at the Indian yards has been made available. The sector suffers from a serious lack of transparency, and it is expected that many accidents go unreported. In the same way, it has not been documented how many more workers suffer from cancer and other occupational diseases.

WHAT HAVE WE DONE?

NATIONAL GREEN TRIBUNAL ACCEPTS BEACHING, THE LEAST SOUND SHIP RECYCLING METHOD

On 27 November 2020, the Indian National Green Tribunal (NGT) dismissed the Public Interest Litigation filed in 2017 by environmental group Conservation Action Trust (CAT). The application challenged the environmental clearance granted for the expansion of the shipbreaking area in Alang.

A report issued by the National Institute of Oceanography (NIO) and submitted to the tribunal in July 2020, reported the presence of high levels of heavy metals (such as chromium, manganese, zinc, arsenic, cadmium and lead), in the onshore and near shore water samples taken at the shipbreaking yards, as well as iron concentrations above permitted levels in fish. Ultimately, the study calls for measures to curtail this pollution at the yards, but failed to provide a

solution as it merely echoed the faulty Environmental Impact Assessment (EIA) upon which the expansion project had been granted environmental clearance, allowing the continued use of the beaching method, a method which is banned in many parts of the world. CAT argued that the true impacts of the beaching method had not been adequately addressed in the EIA report, and that whilst the EIA itself clearly identified the beaching method as the least environmentally sound



“The shipbreaking industry in Alang poses serious threat to the environment on account of extremely hazardous and dangerous operations executed in a closed environment. It has resisted any move to bring in any form of transparency either through integration of technology or any other form of monitoring and oversight mechanism. It cannot be business as usual and it must change.”

Satish Sinha, Associate Director,
Toxics Link



method available when compared to using piers, slipways or dry-docks, it startlingly opted for maintaining the shipbreaking sector in the intertidal zone of Alang in its conclusions.

Scientific data, academic research and media investigations that reveal the human and environmental costs of breaking ships in Alang were submitted to the NGT and CAT showcased the sector's lack of compliance with national Coastal Regulation Zone rules. But the four-judge bench of the NGT that dismissed CAT's petition chose instead to rely on faulty conclusions, rather than evidence and information provided in the EIA, the commissioned NOI environmental audit report as well as the petitioner, CAT.

Whilst the Platform will continue to show-case best practice, the legal battle for proper enforcement of Indian environmental law and workers' rights continues.



“A major challenge during the litigation was the biased submission of a statement by one of the renowned institutes that had technical expertise related to the issue. Despite the fact that shipbreaking activities in Alang have been proven to negatively impact water quality, sediment quality, and biological characteristics, the National Institute of Oceanography (NIO) claims they are not significant. Both the Expert Appraisal Committee (EAC) and

the Ministry of Environment, Forest and Climate Change failed to note many issues pertaining to the project, and did not conduct their appraisals in accordance with the principles of precaution and sustainable development.”

Kankana Das, Environmental Analyst, Legal Initiative for Forest and Environment (LIFE)

GREENWASHING AND THE HONG KONG CONVENTION

The Hong Kong Convention (HKC), adopted in 2009, has not yet entered into force and, to date, it has only been ratified by seventeen countries. Whereas the shipping industry upholds the HKC as the only solution for improving shipbreaking conditions worldwide, its standards have been strongly criticised for rubberstamping the beaching method and not ensuring safe and environmentally sound practices, ignoring crucial issues such as labour rights, and the downstream management of hazardous waste.

Since 2015, more than 90 shipbreaking yards in Alang have received a so-called Statements of Compliance (SoC) with the HKC from private consultants, including ClassNK and RINA. The industry's push to make beaching yards seem “green” has been promoted through the proliferated hand-outs of these statements. However, in addition to ignoring crucial aspects related to safety and environmental protection, it has been revealed that the HKC SoCs are issued without an investigation of actual practice at the

yard, nor verification of the adequacy of the claimed compliance. Even with poor quality environmental monitoring (i.e., unreliable or blatantly deceptive results), yards have qualified for obtaining a SoC. For these reasons, it is widely acknowledged by experts on ship recycling and the European Commission that the statements do not provide the guarantee that the conditions at the yard are safe and environmentally sound.

MONITORING THE PROBLEMS OF SHIPBREAKING IN BANGLADESH

WHAT IS THE ISSUE?

Even though the situation is appalling, in terms of tonnage the Chattogram yards have become the world's top destination for end-of-life vessels. 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 waste. Media outlets, including the Guardian and Al Jazeera, have brought back shocking reports on the human rights abuses and environmental degradation caused by the shipbreaking activities.

Already in 2009, a land-mark decision by the Supreme Court ordered the closure of the shipbreaking industry as none of the yards held the necessary environmental clearance to operate. However, after only two months of closure, the yards were allowed to re-open with incomplete authorisations in hand and little change in practice. Hence, in 2016, the Supreme Court 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 Court's decisions.

National laws in Bangladesh are poorly

implemented due to weak enforcement capacity, or deliberately ignored as a result of industry pressure. End-of-life vessels are imported with falsified 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 waste, 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.

In 2020 and 2021, the Platform documented the stories of 24 workers who lost their lives and 48 who suffered severe injuries. These accidents are reported by the Platform according to local sources as there is no data published by Bangladeshi authorities or the shipbreaking industry. Because there is no ambulance available to transport injured workers to the closest specialised hospital, which is located one-hour drive away from the yards, many lives that could have been saved

go lost. Not even emergency first aid equipment is available at many yards, and workers do not automatically receive financial support for necessary medical treatment, leaving them impaired for life.

The employment of children is furthermore of particular concern at the shipbreaking yards in Bangladesh. It is illegal under Bangladesh's Labour Act to employ children and adolescents in hazardous industries such as shipbreaking. Yet, a study



"The beaching of the J.NAT would represent an unprecedented threat for the workers and the environment in Bangladesh. It should be clear that our country is not a dumping site. The J.NAT carries tons of toxic substances, including high quantities of mercury, that expose workers to deadly risks."

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



issued in 2019 by the University of Chattogram 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 in 2008, many young teenagers between 15-17 years old are now offered work during nightshifts.

Holding the shipbreaking industry accountable for the damage it causes locally is challenging. The yard owners are well connected both economically and politically, and in Bangladesh, the capacity of local labour inspectors is very limited. Local activists, journalists and workers who have been vocal about the dire conditions at the yards have hardly found any support, and have even been threatened.

WHAT HAVE WE DONE?

SUPPORTING THE RIGHTS OF COMMUNITIES AND WORKERS AFFECTED BY SHIPBREAKING

With the support of the Royal Academy of Engineering and the Lloyd's Register Foundation under the Engineering X-Safer End of Engineered Life Mission, the Platform and its local members have aimed to increase public awareness about the current shipbreaking practices and inform shipbreaking workers about their rights.

FUNDRAISING FOR INJURED WORKERS AND FOR ASBESTOS VICTIMS

Together with partner organisation Centre for the Rehabilitation of the Paralysed (CRP) the Platform launched a fundraising campaign to help afflicted workers from the shipbreaking sector that have suffered severe injuries, such as burns, amputations or serious spinal damage.

Workers are also vulnerable to occupational diseases due to the exposure to toxic substances embedded within the ships' structure, including asbestos. The Platform therefore also secured support to help detect illness and provide workers suffering from asbestosis with daily treatment.

REVERSING THE ATTEMPT TO REMOVE SAFEGUARDS

As a result of pressure from shipbreaking yard owners, the Department of Environment (DoE) shamefully proposed to downgrade the status of the shipbreaking industry in Bangladesh from "RED" (dangerous) to "ORANGE" (moderately dangerous), ignoring the true harm this industry causes to the safety of workers and the environment.

BELA responded to the government's decision by submitting a legal notice requesting the cancellation of the status change for the shipbreaking sector. Following BELA's actions, the

Court directed the Department of Environment to reinstate shipbreaking in the "RED" category. Whilst most environmental laws and workers' rights continue to be ignored in Bangladesh, maintaining the RED category sends a clear message that this is a sector which needs to take particular precautions.

MONITORING THE PROBLEMS OF SHIPBREAKING IN PAKISTAN

WHAT IS THE ISSUE?

The conditions at the shipbreaking yards in Pakistan are also harsh and alarming. 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 deliberately ignored in Gadani, and trade unions, such as the IndustriAll-affiliated Pakistan National Trade Union Federation (NTUF) as well as the Shipbreaking Workers Union Gadani, have voiced strong concerns related to the systemic breaches of basic labour rights. The working conditions in Pakistan were widely exposed after the explosion of 1 November 2016 of the FPSO ACES tanker, sold to Pakistan by an Indonesian company, which is considered the worst tragedy in the history of shipbreaking. At least 29 workers lost their lives and more than 60 workers were reported injured. 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.

WHAT HAVE WE DONE?

ALLERTING AUTHORITIES ON ILLICIT PRACTICES : FSO JESSLYN NATUNA

After its import in Bangladesh and India was denied, and despite warnings by international civil society groups and Interpol, the Floating Storage and Offloading (FSO) tanker J. NAT reached the beach of Gadani on 30 April 2021. Under the new name of CHERISH, and after several months off the radar, the vessel departed from Mumbai towards Gadani. Once beached, local media reported that mercury-contaminated oil sludge was removed from the ship and filled in drums for sale, with workers complaining of severe burning, rashes on their hands and face, and breathing difficulties.

The CHERISH was reported to contain 1,500 tons of mercury-mixed oil as well as higher levels of other dangerous chemicals. It is further likely that the vessel's steel is contaminated by mercury, which will release extremely toxic vapors when heated by blow torches. Authorities halted the dismantling operations following the

local media alerts, and sent samples of loaded materials to three private laboratories in Karachi, Pakistan.

The Balochistan's Environmental Protection Agency ordered the closure of plot 58 where the FSO was beached and launched an investigation by a joint team of different government departments. Whilst the investigation failed to find the initial reported levels of mercury in oil sludges, a ban on hot-work was maintained. Concerns that the steel is contaminated remain.



“This industry is a neglected maritime sector facing many challenges such as the absence of basic facilities and the lack of compliance with international obligations. Any attempt to revive this shipbreaking sector in Pakistan must comply with international regulations and has to ensure that recycling operations take place in industrial sites where both the environment and workers are protected.”

Dr Md Irfan Khan, Board Member, NGO Shipbreaking Platform

OTHER RECYCLING DESTINATIONS

TURKEY

Turkey dismantled 94 ships in 2020 and 77 in 2021. In comparison to South Asia, Turkey dismantles primarily smaller vessels, many of them either EU-owned or EU-flagged. By excluding beaching as an option for the recycling of their vessels, the cruise sector saw several of its ships being sold to EU approved yards in Aliğa in 2020 and 2021. According to shipping databases, 11 cruises were recycled in Aliğa. Many owners, such as Carnival and Pullmantur, took steps to reduce their operating expenses, including the retirement of young vessels due to loss of business following the Covid-19 pandemic.

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. Civil society has also raised concerns about accident rates and the low awareness of occupational diseases.

On 3 October 2020, a worker lost his life during the scrapping of two Transocean offshore rigs at Isiksan yard. In 2021, another five workers lost their lives at the ship recycling yards in Aliğa. These accidents have prompted increased concerns about the working conditions in Aliğa, including the

safety measures, the management of hazardous waste downstream as well as the lack of transparency and monitoring of occupational diseases affecting shipbreaking workers. The Platform has raised these concerns with the European Commission.

Eight yards in Aliğa are currently included on the EU list of approved ship recycling facilities. In order to make it on the EU list, the yards are subjected to on-site assessments of their environmental and safety performances.

REST OF THE WORLD

35 approved facilities are located in the EU. These yards are currently mainly recycling government-owned and smaller vessels, and operate grossly under their full capacity as most ship owners have preferred the higher profits offered by the beaching yards. In the US, facilities, mainly located in Texas, are able to recycle vessels in a safer and more environmentally friendly way than on the beaches of South Asia. One of these yards has been included on the EU List of approved ship recycling facilities. Similarly to the facilities in the EU, US yards operate under capacity.



“Over the last 30 years, the causes of accidents have remained the same. Unfortunately, many workers also suffer from occupational diseases, such as cancer, years after exposure to toxic substances. Yet, industry stakeholders continue to claim that there are no occupational diseases in the shipbreaking yards of Aliğa. The removal and disposal of asbestos and other hazardous materials, including lead, puts workers’ health at risk. Recently Aliğa has been dealing with a very high workload resulting in growing profits. Not ensuring transparency and that enough is done on safety and environmental protection is simply not acceptable. It is imperative that the European Commission demands higher standards and no longer assumes that conditions in Aliğa are satisfactory simply because they seem to be compliant on paper.”

*Asli Odman, Academic and Volunteer,
Istanbul Health and Safety Labour Watch*



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 waste to developing countries from the EU is prohibited under the EU Waste Shipment Regulation. The Basel Convention's Ban Amendment - which prohibits the export of hazardous waste, including end-of-life ships, from OECD to non-OECD countries - is now applicable at the international level.

Regrettably, ship owners have been easily circumventing current European and international law governing the trade of end-of-life vessels. Under the false pretext of continued operational use or repair work, most ship owners do not declare their intent to dispose of their vessels and thus escape from law enforcement. The industry-driven International Maritime Organisation (IMO) adopted the Hong Kong Convention in 2009.

Even though it has not yet entered into force, around 90 shipbreaking yards in Alang, India, are claiming that they meet the requirements of the Convention. The Hong Kong Convention does not ban beaching; does not regulate the downstream management of hazardous waste; sets no standards for labour rights; and

provides no independent certification and auditing scheme for the recycling facilities. For all these reasons, it 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, as well as by legal experts and European policy makers. On 30 December 2018, the EU Ship Recycling Regulation became applicable, setting a higher standard for safe and environmentally sound ship recycling.

obligations under the Basel Convention and it would be in stark contradiction with the EU's new strategic economic and environmental policy initiatives announced with the Green Deal. Bolstered by a new legal analysis by the Center for International Environmental Law (CIEL), the report sets forth recommendations for amendments of the EU Ship Recycling Regulation as well as how to effectively engage with the ship recycling industry within the framework of the new European Green Deal and Circular Economy ambitions.

WHAT HAVE WE DONE?

EUROPEAN GREEN DEAL UNDER THE SPOTLIGHT

Following the adoption of the new European Green Deal and the global entry into force of the Basel Ban Amendment, the Platform, together with the Basel Action Network (BAN), the European Environmental Bureau (EEB) and Greenpeace, published a report entitled *Contradiction in Terms: European Union must align its ship exports with International Law and Green Deal Policies*.

The report explains why it is not acceptable, both from a legal and EU policy standpoint, to allow the export of EU vessels to developing countries such as India, Pakistan and Bangladesh. In fact, it would violate Member States'



“By allowing the breaking of European vessels in the Global South, Europe is not only exporting hazardous waste and threatening people's health in developing countries, but also contradicting its own ambition to boost the domestic supply of secondary raw materials – as set out in its circular economy action plan. EU leaders must focus on re-processing, reusing and recycling valuable materials, particularly steel, within Europe.”

Stéphane Arditi, Circular Economy Policy Manager, European Environmental Bureau (EEB)



THE EU WASTE SHIPMENT REGULATION PROPOSAL: WIN FOR ENVIRONMENTAL JUSTICE

In its proposal for a new regulation on waste shipments published on 17 November 2021, the European Commission agrees that the Global South should not become the world's dumping ground for hazardous waste. In 2013, EU-flagged vessels were removed from the scope of the waste shipment rules by way of the EU Ship Recycling Regulation.

Now, the EU Waste Shipment Regulation proposal states that EU-flagged vessels intended to be scrapped whilst under EU jurisdiction are no longer exempted from EU waste laws and need to comply with the Basel Ban Amendment which makes it illegal to export any form of hazardous waste from OECD to non-OECD countries for any reason. Under the EU Ship Recycling Regulation, the EU maintains a list of currently 44 approved ship recycling facilities in the OECD. Regrettably, however, very little of the world's fleet of ships, including those registered under an EU flag, are going to be caught in an EU port when they declare they are to be recycled. It remains all too easy for ship owners to wait to make the fateful scrap announcement in the ports of non-OECD countries or even on the high seas, and thus circumvent the Basel Ban.

EU TAXONOMY ON SUSTAINABLE FINANCE

The EU has adopted a first delegated act on the taxonomy for sustainable financing – e.g., what can be considered green financing. The act relates to climate mitigation, but stipulates that financing aimed at reducing climate gas emissions can only be considered green if they “Do No Substantial Harm” to the EU's other environmental objectives.

For the building of new low-emission ships, this has been defined as using EU listed facilities for the scrapping of the older and more polluting vessels that are being replaced by the less-emitting ships. This provides a major leverage to push for better ship recycling policies with companies that are seeking green financing for the building of low-emission vessels.

INVESTIGATION LAUNCHED ON ILLEGAL EXPORT OF ICELANDIC TOXIC SHIPS TO INDIA

The Platform has prompted several criminal investigations by EU enforcement authorities against shipping companies involved in the illegal export of end-of-life vessels. In 2020, the illegal export of the container ships GODAFOSS and LAXFOSS, owned by Icelandic company Eimskip, to the Indian beach of Alang for dirty and dangerous scrapping was under the spotlight of Icelandic program Kveikur, broadcasted by radio and television Ríkisútvarpið (RÚV).

The export of the two container vessels to South Asia was in clear breach of European waste laws, which prohibits the trade of hazardous waste, including end-of-life ships, from OECD countries to non-OECD countries. Eimskip's counterpart to the sale was none other than GMS, one of the most well-known cash buyers of end-of-life ships. Both ships were in European waters when the decision to sell for scrap was taken. Before reaching the Indian beach of Alang, via Suez, they briefly stopped in Rotterdam and Athens respectively.

At the time of the export of the ships, the Platform formally requested Icelandic, Dutch and Greek authorities to hold all the parties involved in the sale accountable for breaching EU waste legislation. The Icelandic authorities have confirmed that the case has been brought to the public prosecutor for further investigation and the police has since raided Eimskip's offices.



MILESTONE

NORWEGIAN SHIP OWNER SENTENCED TO PRISON

George Eide, a Norwegian ship owner, was sentenced to six months unconditional imprisonment by the Sunnhordland District Court in Norway for having assisted scrap dealer Wirana in an attempt to illegally sell the TIDE CARRIER (EIDE CARRIER and HARRIER) to Pakistan for scrapping. The Court also ordered the confiscation of criminal dividends of NOK 2 million (about 200.000 €) from Eide Marine Eidendom AS.

In 2017, the Platform, together with its member organisation Bellona Foundation, alerted the police about the imminent illegal export. Waste trafficking linked to shipbreaking is being investigated by enforcement authorities in several EU Member States. It is also being looked at from a transnational point of

view via Europol and Interpol. The Norwegian District Court emphasised an increasing need to counter environmental crime.

The Public Prosecutor and the judges stressed that there was no doubt that Eide had knowledge that the ship would be scrapped in Asia, and had also provided assistance in preparing for its last voyage.

“ ”

“The scrapping of obsolete ships is a major international environmental problem. As a large maritime nation, it is important that the Norwegian authorities contribute to the fight against this problem.”

Maria Bache Dahl, Public Prosecutor, Økokrim



GERMAN POLICE RAID SHIP OWNER OFFICES

In August 2021, more than 100 police officers raided the offices of several high profile German ship owners for their involvement in illegal ship exports in 2016-2017 of which the Platform had alerted. The cases have received wide media attention and are still being investigated.

The Platform had the opportunity to inform German and European police forces on the typical “modus operandi” of shipbreaking transactions at a training hosted by the German Police Academy and worked also with investigative journalists from ARD, Germany’s largest public broadcasting network.

BELGIAN SHIPOWNER BROUGHT TO COURT

On 25 June 2021, the Antwerp Court dismissed charges pressed against Belgian ship owner Bocimar, a subsidiary of CMB, for the illegal export of the MINERAL WATER to Bangladesh in 2016. Belgian Federal police and the Public Prosecutor argued that European waste law should be applicable despite the vessel having left China for shipbreaking in Chittagong

as the vessel was Belgian owned and registered under the Belgian flag.

In 2016, the EU Ship Recycling Regulation had been adopted but was not yet applicable. The Platform acts as expert witness in the case and has been informed that the Prosecutor is considering to appeal the acquittal.

ASBESTOS LADEN AIRCRAFT CARRIER: SÃO PAULO

Fifteen years after the Clemenceau scandal, a similar case has surfaced. The Clemenceau’s sister ship São Paulo (ex-Foch) was sold by the French Navy to the Brazilian Navy in 2000. After being decommissioned, its auctioning started in 2019 in Rio de Janeiro where both EU-approved facilities and Indian shipbreaking yards took part. NGOs called upon both French and Brazilian authorities to ensure the safe and environmentally sound recycling of the military ship and highlighted the risks linked to exporting the vessel for breaking at a beaching yard. After a long auction process, the São Paulo has been sold to an EU-approved facility in Turkey.

However, some concerns still exist related to the lack of transparency during the bidding process. The actual

amount of asbestos inside the aircraft is unknown. The lack of a proper Inventory of Hazardous Materials (IHM) has led NGOs, including the Platform, to send a public letter to official authorities not only in Brazil but also in France and Turkey calling upon all competent bodies to ensure a proper identification of the hazardous waste on board the aircraft carrier. To date, the vessel is still anchored in Brazil.



MAKING BUSINESS DO THE RIGHT THING

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. 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.

By registering 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 scrapping of their vessels at the beaching yards. However, selling to a cash buyer has become increasingly difficult to use as an excuse 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

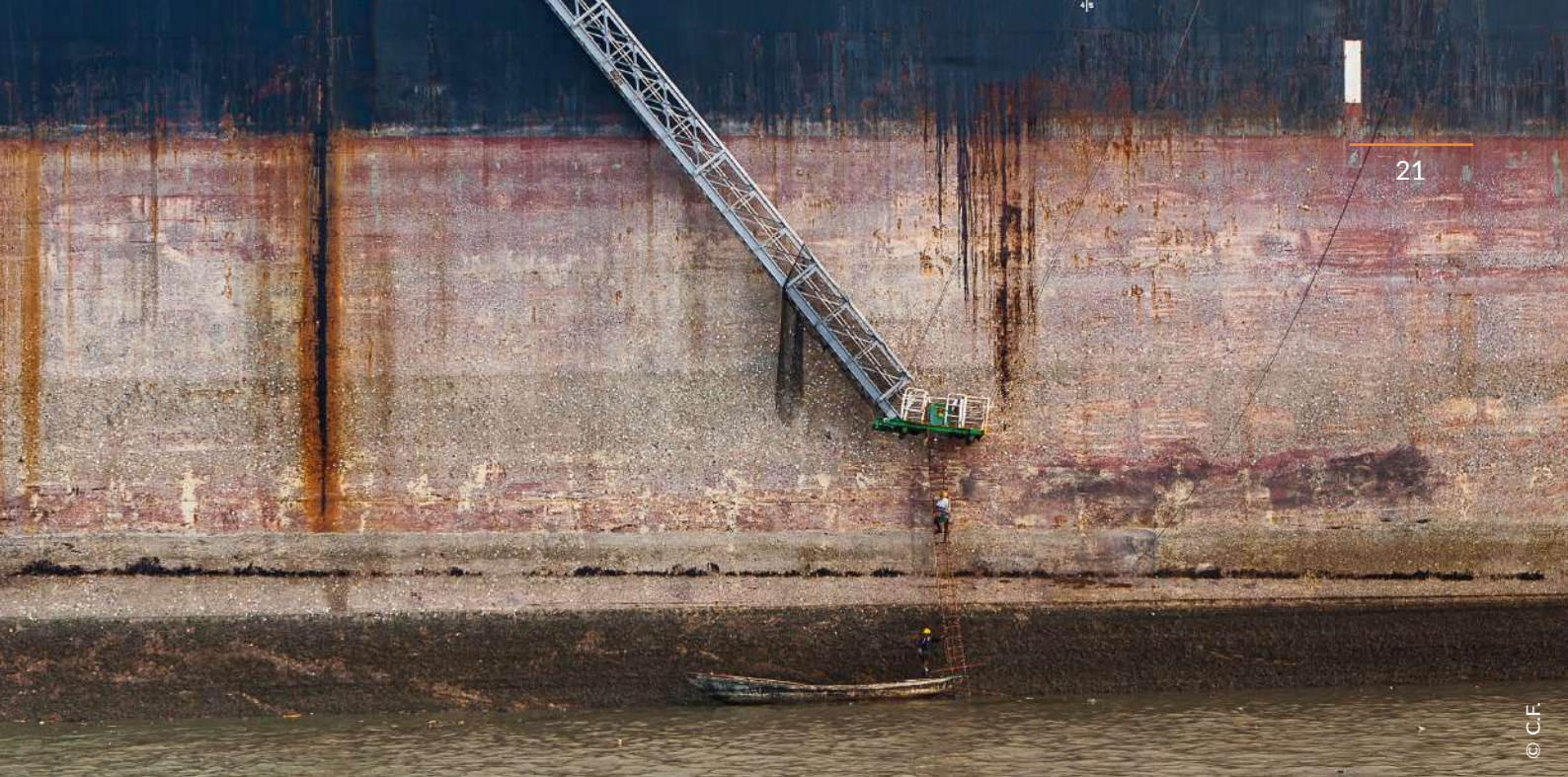
with this demand - and often with a much more public profile than most ship owners - banks, pension funds and consumer brands, upon which international shipping depends, are taking steps to ensure responsible ship recycling.

MILESTONE **CARNIVAL CORPORATION COMMITS TO SUSTAINABLE SHIP RECYCLING**

Major cruise company Carnival Corporation worked with the Platform's member organisation Bellona Foundation on the development of a comprehensive ship recycling plan for two of its retired vessels and committed to sustainable ship recycling in EU approved facilities. Dismantling a

cruise ship is complex, involving many components for reuse, recycling and waste for disposal. Following the Covid-19 pandemic, there has been a surge in cruise ships expected to head for the scrap yards, and the decision by Carnival has set an important precedent. 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, Van Oord and Wallenius Wilhelmsen.



WHAT HAVE WE DONE?

PROMPTED ENGAGEMENT FROM FINANCIERS

Given the slowly increasing focus on environmental, social and governance criteria for investments, profits made on the back of people and the environment are not acceptable anymore. 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.

FOCUS ON CRUISE SECTOR

The cruise sector has been particularly impacted by the Covid-19 pandemic with many ship owners forced to file bankruptcy or take steps to reduce operating expenses, including the retirement of relatively young fleet. Whilst some companies have adopted responsible policies, many have instead sought the higher profits obtained at the beaching yards. The Platform has alerted both Greek and UK authorities of several illegal exports.

Greek authorities are particularly unresponsive and continue to ignore the illegal exports from Greece. The Platform has closely worked with Greek investigative journalists as well as with well-known media outlets such as BBC Radio4 Podcast, Business Insider and Forbes.

FOCUS ON BRAZIL

There is an increasing inventory of oil and gas units in Brazil that will need to be decommissioned in the coming years. Via presentations at online conferences on ship recycling and offshore decommissioning organised by SOBENA, the Platform has engaged with Brazilian ship recycling yards, environmental authorities and major shipping and oil & gas companies. The aim has been to enhance awareness on the issue in Brazil, so that regional tonnage can be recycled in a sustainable manner.

Currently, many Brazilian companies are selling their obsolete tonnage for breaking on the beaches of South Asia. Petrobras is one of the shipping companies with the worst corporate dumping practice. Four years have passed since civil society organizations and trade unions urged the Brazilian government to stop the dumping of toxic ships on South Asian beaches. Yet, oil giant Petrobras dumped nine of its old tankers in South Asia only in 2020. The units were auctioned off to unscrupulous scrap-dealers, also known as cash buyers.

FOCUS ON HUMAN RIGHTS DUE DILIGENCE

The widow of a shipbreaking worker in Bangladesh, Hamida Begum, received a High Court’s approval in the UK to pursue a negligence claim against shipping company Maran Ltd.

Khalil Mollah lost his life on 30 March 2018, while dismantling the oil tanker EKTA on the beach of Chattogram, Bangladesh. British law firm, Leigh Day, has represented Khalil’s widow arguing that Maran was responsible for the tanker being dismantled under dangerous practices on the beaches in Bangladesh. The High Court judgement set an important legal precedent in favor of workers’ compensation and environmental protection.

WORST SHIP-DUMPING COMPANIES

2020

POLARIS SHIPPING

South Korea



PETROBRAS

Brazil



2021

SINOKOR

South Korea



EUROPEAN NAVIGATION

Greece



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

PRESS HIGHLIGHTS



THE GUARDIAN JANUARY 2020



BBC DISCLOSURE MARCH 2020



RUV SEPTEMBER 2020



THE DAILY STAR DECEMBER 2020



THE GUARDIAN MARCH 2021



BBC MARCH 2021



BUSINESS INSIDER MAY 2021



CHEDDAR NEWS MAY 2021



FORBES JUNE 2021



A VIBRANT GLOBAL NETWORK

ORGANISATIONAL DEVELOPMENT

The NGO Shipbreaking Platform is a coalition of 17 environmental, human and labor rights organizations. 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 clean, safe, and just practices that no longer cause harm to workers, local communities, or the environment at end-of-life.

EXPANDING FOCUS TO INDONESIA

In October 2020, the Nexus Foundation for Environmental, Health, and Development, also known as Nexus3Foundation, joined the Platform as a partner organisation. The organization works to safeguard both the public, especially vulnerable populations, and the environment from the negative impacts of global development, promoting a just, toxic-free, and sustainable future. Every year, numerous toxic ships and oil and gas wastes are illegally exported from Indonesian ports to the infamous shipbreaking beaches of South Asia. In the past years, local activists and international NGOs warned Indonesian authorities about the illegal departure of several mercury-laden tankers, such as the FPSO Yetagun and the FSO J.NAT. Oil sludge residues from the processing of crude oil extracted in

the East-Asia region commonly contain mercury, which ends up contaminating the offshore units' structures, tanks and piping.

NEW JOINT PROJECT: NEXUS 3 FOUNDATION AND BELA

The Platform secured funding for a joint project between Platform member BELA and partner Nexus3Foundation, entitled Environmental justice: raising awareness and legal action for the safe and environmentally sound management of Indonesia's end-of-life fleet. The main objective was to advocate for a ban on the import of FSOs and FPSOs to Bangladesh for scrapping, and to enhance awareness in Indonesia on the end-of-life management of the many oil and gas units that operate in their waters. Nexus3Foundation has built up an effective data-base on FSOs/FPSOs operating in Indonesian waters, and litigation has been initiated by BELA, building on the successful outcome of the NORTH SEA PRODUCER case in 2019 and the ban on the import of the J.NAT in 2021.

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 the NGO coalition www.the-case.eu at the EU level to ensure new legislation aimed at protecting journalists, activists and whistle-blowers from SLAPP.

SHIPBREAKING CASES FEATURE ON AMNESTY INTERNATIONAL'S NEW CORPORATE CRIMES HUB

The Platform has worked with the corporate crimes team at Amnesty International and provided information on several of the criminal investigations that have been launched in Europe following Platform alerts. The cases are featured on the Corporate Crime Hub website case map. The site is aimed at being a tool for NGOs and public prosecutors that seek to hold

FUNDRAISING CAMPAIGN

HELP PROVIDING TREATMENT TO
INJURED WORKERS AND ASBESTOS VICTIMS
IN BANGLADESH

DONATE NOW



companies accountable for criminal activities, including environmental crimes. The Platform will continue to work with Amnesty to ensure that other and new shipbreaking cases are featured.

FUNDRAISING CAMPAIGN

Shipbreaking workers, often exploited migrants, lose their lives on accidents or suffer severe injuries, such as burns, amputations and serious spinal injuries, due to unsafe working conditions. The shipbreaking workers are also vulnerable to occupational diseases due to the exposure to toxic substances embedded within the ships' structures, including asbestos, PCBs and heavy metals. Asbestos is one of the most common and most hazardous materials found onboard ships. When extracted, it breaks into fine fibres, which can be suspended in the air for long periods

of time. If inhaled, the fibres can lead to fatal diseases such as lung cancer, mesothelioma and asbestosis.

Since 2009, around 7000 ships were beached in South Asia with a recorded data of 425 deaths and 329 injuries. The figures on accidents are likely to be much higher, and occupational diseases are not even registered in these statistics and are difficult to monitor.

We are now calling for your support! To guarantee the full rehabilitation of afflicted workers in Bangladesh we are raising money for our partner, the Centre for the Rehabilitation of the Paralyzed (CRP). Our fundraising campaign aims at providing injured workers with medical assistance, and workers suffering from asbestosis with daily treatment and emergency help in acute cases.

FINANCIAL STATEMENT

INCOME	2020	2021
Membership fees and members' contributions	7.250	7.250
Maribel	41.000	43.320
European Commission	156.384	137.854
Foundation	55.837	79.562
Other	1.303	1.361
Contributions from reserves	3.677	2.287
TOTAL INCOME	265.450	271.634
EXPENDITURE	2020	2021
ACTIVITIES		
Travel costs	6.251	592
Communication Material	2.474	853
Public Awareness and Data Collection in South Asia	16.859	45.046
TOTAL ACTIVITIES	25.584	46.491
STAFF		
Salaries and social charges	214.997	196.872
Other Salary costs	1.422	3.921
SUB-TOTAL STAFF	216.419	200.793
GENERAL COSTS		
Rent	4.731	4.899
Office costs	2.471	2.796
Communication costs	4.045	2.372
Other costs	2.555	4.835
Subscriptions	7.352	7.595
External Costs	2.294	1.854
TOTAL GENERAL COSTS	23.448	24.350
TOTAL EXPENDITURE	265.450	271.634

WHO WE ARE



INGVILD JENSSEN
Founder and
Director

NICOLA MULINARIS
Communication and
Policy Officer

SARA COSTA
Project Officer

BENEDETTA MANTOAN
Policy Officer
(since October 2021)

PILAR GIANNI RODRÍGUEZ
Communication and Event
Officer
(since October 2021)

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



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.



Surfriider 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.

 SECRETARIAT

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