



NGO
SHIPBREAKING
PLATFORM



IMPACT
REPORT

2022
2023

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

*Published by: NGO Platform on Shipbreaking (asbl)
Rue de la Linière 11, B - 1060 Brussels*

*Edited by: Ingvild Jenssen, Nicola Mulinaris,
Sara Costa, Benedetta Mantoan, Ekin Sakin*

*Design: Giulia Morandini
Cover photo: © NGO Shipbreaking Platform*

FIND US ONLINE

We thank the European Commission and the LIFE programme for their support.

*www.shipbreakingplatform.org
Facebook: [/shipbreakingplatform](#)*





EDITORIAL



Dear Friends,
2022/2023 has brought us closer than ever to the inevitable tipping point for safe and sustainable ship recycling, even as the worst forms of ship recycling proceeded unabated on the beaches of South Asia.

As were vessels owned by the world's largest shipping lines, Danish-based Maersk and Swiss-based MSC, some two thirds of the world's end-of-life merchant ships continued to be broken in the dangerous and polluting yards in Bangladesh, India and Pakistan. Workers and relatives in Bangladesh, interviewed in collaboration with Human Rights Watch in 2022, told heartbreaking accounts of accidents and deaths and of the lack of responsibility taken by shipbreakers and ship owners.

Raising the stakes for shipping companies who break the law, over the past two years we worked with Interpol, national police and government prosecutors by providing expertise, trainings and the evidence needed to hold shipowners accountable. Exporting hazardous waste ships to

South Asia is a criminal offence under EU law. For the first time, in 2022 a shipowner was sent to jail for having attempted to illegally export an end-of-life vessel to Pakistan.

Turkish civil society also erupted in protest against the imminent import of the Brazilian aircraft carrier São Paulo for recycling after the Platform revealed that the ship's hazardous materials inventory underrepresented hundreds of tonnes of asbestos, PCBs and other toxic substances. The public outrage led to Turkey's dramatic decision to turn back the ship. With the eyes of the world upon it, the Brazilian navy inexplicably sank the ship off of its coast, violating international ocean dumping and waste export laws.

We will never have a true accounting of the hazardous materials contained onboard the São Paulo, and perhaps that was Brazil's intention. But the event highlighted the importance of democratic freedoms in countering the corruption and lack of transparency permeating shipbreaking. The clamp down on civil engagement and free press in India has made this importance painfully apparent over the past two

years, where the Modi government has threatened serious repercussions on a wide range of critical civil society voices fighting against human rights breaches and environmental degradation.

The UN Environment Program says ships should be recycled in contained and stable infrastructure, not on tidal mudflats. While shipowners argue there is a lack of capacity, the truth is that recycling dry-docks are underutilised and that ship owners have a choice to opt for better options than beaching yards. In July 2023, Petrobras the major Brazilian energy company made a good choice. The company announced its new commitment to recycle 26 floating offshore platforms in dry-docks and yards with impermeable services at a worth of \$9.8 billion dollars. Following that good news, the United Arab Emirates announced that it would require ships in its new foreign registry to be recycled in dry-docks and on impermeable platforms.

Fed up by the lack of vision and incremental approach dominating the discourse on ship recycling, with much excitement we successfully launched our first Ship Recycling Lab in Rotterdam



in 2022. Forward thinkers from start-ups and corporations in the shipping, steel and recycling sectors shared their experience and innovations to enhance circularity and sustainability in ship recycling. The event and our magazine *Breaking Out* highlighted drydocks, robotics, cold cutting, steel cleaning, material passports, green ship building, and financial incentives for responsible ship recycling.

In 2023, the International Maritime Organisation's Hong Kong Convention received the ratifications needed to come into force in 2025. This law requires ships to carry an inventory of hazardous materials, but does not say how recyclers should dismantle ships or manage their wastes in a safe and environmentally sound manner. Shipping companies and beaching yards have been eager to see the Hong Kong Convention supplant the farther-reaching requirements of the Basel Convention and EU Ship Recycling Regulation.

For the upcoming review of the EU Ship Recycling Regulation, we recommend a financial incentive to reduce the cost gap between substandard and

sustainable ship recycling and to better use the EU's own ship recycling capacity, which would uphold European Green Deal and Circular Economy priorities by increasing the use of scrap steel and lowering emissions from the steel sector. We also proposed a re-flagging alert system to notify port authorities of intent to illegally recycle. Our report on the status of recycling in Aliaga further revealed weaknesses in the EU's requirements and monitoring of approved facilities in Turkey, where following two fatalities and our request for action, the EU had already removed two yards from its approved list.

Preventing the externalisation of human and environmental costs is at the heart of the Basel Convention, which bans the export of hazardous waste to developing countries. Looking ahead, the Platform will continue to urge the United Nations to recognise the Basel Convention's authority over end-of-life ships and call on the EU and all countries to effectively enforce the Basel Convention in their laws and policies.

We thank our members and supporters for empowering our steady progress

and ability to stand up to immense challenges. The Ship Recycling Lab has brought new stability to the work of our Secretariat whose small but mighty team continues to adopt new strategies and partnerships, steadily advancing change for the safe, ethical and environmentally sound dismantling of end-of-life ships worldwide.



Helen Périvier,
President, Board of Directors,
NGO Shipbreaking Platform

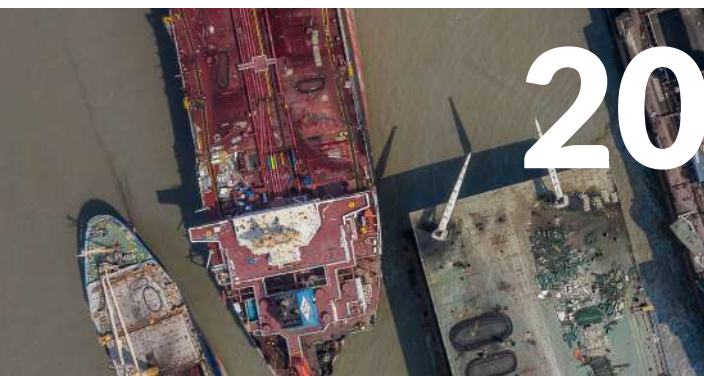


TABLE OF CONTENTS

Editorial	01	Other Recycling Destinations	18
What is the Problem?	04	Support our Work	19
The Global Shipbreaking Crisis	08	Getting the Legal Framework Right	20
Monitoring the Problems of Shipbreaking in India	10	Closing the Loop Scrap Steel Recycling	22
Monitoring the Problems of Shipbreaking in Pakistan	13	Making Business Do the Right Thing	24
Monitoring the Problems of Shipbreaking in Bangladesh	14	A Vibrant Global Network	26
Monitoring the Problems of Shipbreaking in Turkey	16	Who We Are	30



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 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 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



“There is no possibility to take apart a ship on a beach in a way that is environmentally sustainable and safe for workers. Shipping companies are dodging their responsibility to make sure their toxic

waste does not harm workers' health and sensitive coastal environments.”

Ingvild Jenssen, Executive Director and Founder - NGO Shipbreaking Platform



A VISION FOR TOMORROW: 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.

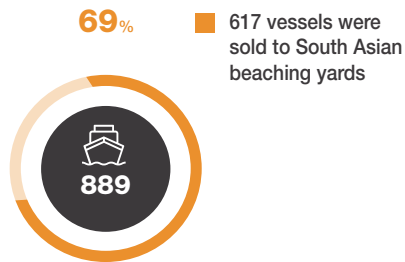


THE GLOBAL SHIPBREAKING CRISIS

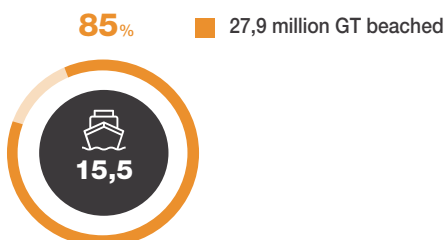
FACTS & FIGURES

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 2022 and 2023, 889 ocean-going commercial ships and offshore units were dismantled, 617 of these ships were sold for dirty and dangerous shipbreaking on the beaches of South Asia, amounting to more than 80% 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. Whilst the South Asian shipbreaking yards experienced the lowest turnover in over a decade, with a significant drop in terms of the number of ships scrapped, they remained the preferred destination for end-of-life vessels.

Vessels scrapped in 2022 and 2023 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. In 2022 and 2023, a total of 93 ships were dismantled in Aliaga, Turkey, a site where nine EU-approved ship recycling yards are located.

SHIPPING COMPANIES BAD TRACK RECORD

The 2022 and 2023 worst country dumper was China. Despite the existence of state-of-the-art ship recycling facilities at national level, Chinese owners sold a total of 99 ships for scrapping in South Asia, most of which were beached in Bangladesh.

In 2022, Russia, Singapore, the United Arab Emirates (UAE) and Greece followed China with more than a dozen ships beached each. Singaporean shipping company Berge Bulk has figured amongst the worst corporate dumper several years in a row, reached the top in 2022. Berge Bulk's scrapping practices stand in evident contrast with the company's declared commitment to sustainability and safety. Brazilian state-owned company Petrobras and BW Offshore were another well-known companies in the list of worst dumpers.

In 2023, Hong Kong, UAE, Thailand, Greece, Russia and South Korea followed China as worst dumpers with more than a dozen ships beached each. Swiss containership giant Mediterranean Shipping Company (MSC) was the 2023 worst corporate dumper, with 14 old container ships



scrapped in Alang, India. Evergreen, Gearbulk, Green Reefers, Maersk, Sinokor and Zodiac Group Monaco are other well-known companies that sold their toxic assets for scrapping on South Asian beaches in 2023.

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 most popular end-of-life flags for vessels scrapped on the beaches in 2022 and 2023 were Cameroon, Comoros, Tanzania, Mongolia, Palau and St Kitts and Nevis, so-called flags of convenience known for their poor implementation of international maritime law.

In 2022 and 2023, only a minor fraction of the European capacity for ship recycling was utilised. The EU controls around 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.

END-OF-LIFE FLAGS OF CONVENIENCE

2022

COMOROS



GABON



PALAU



PANAMA



SIERRA LEONE



ST KITTS & NEVIS



END-OF-LIFE FLAGS OF CONVENIENCE

2023

COMOROS



GABON



PALAU



PANAMA



SIERRA LEONE



ST KITTS & NEVIS





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.

This Code, based on the beaching method for ship dismantling, was revised in 2017 to address hazardous substance disposal responsibilities, amid compliance issues at Alang shipyards. In 2019, India adopted the Hong Kong Convention (HKC) and enacted the Recycling of Ships Act 2019, to regulate ship recycling, set standards, and align with international obligations. Despite global concerns about beaching, the Act retains the same methodology as the 2013 Code, focusing on responsibilities of ship owners and recyclers, and preparation of ship recycling plans, without addressing the further processing or disposal of hazardous materials. 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.

The cutting and removal of an end-of-life vessel's steel structure on a tidal beach itself is extremely hazardous, creating serious risks for the workers involved in these operations. Furthermore, the ship's steel is also laden with paints that contain heavy metals and other hazardous materials that release toxic fumes when cut with gas torches.

Media reports continue to flag serious concerns related to pollution of the intertidal area: absence of adequate medical facilities to treat serious injuries, 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. In India, there is a Treatment Storage and Disposal Facility (TSDF), however, concerns persist related to the management and control of downstream waste management.

In 2022, a worker lost his life while scrapping BW Offshore's Floating Production Storage and Offloading (FPSO) unit CIDADE DE SAO

VICENTE (IMO 7380693) at an Indian beaching yard. According to local sources, a nitrogen tank removed from the vessel violently exploded and killed the worker on the spot.

Despite having been offered a more sustainable solution for the recycling of the vessel when it was in the Middle East by new-comers Elegant Exit Company at the Bahrain-based ASRY dry-dock and SULB steel production facility, BW Offshore decided to sell the FPSO to the Indian beaching yard for a supposedly higher price. 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.



GREENWASHING AND THE HONG KONG CONVENTION

The International Maritime Organisation's (IMO) Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships will enter into force in June 2025 as major flag state Liberia and the Government of Bangladesh, heavily pushed by Japan and Norway, have ratified the Convention in 2023, fourteen years after its adoption. 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. 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. Some Indian yards assessed for inclusion on the EU's approved list in 2019 and 2020 were rejected, for reasons including lack of adequate medical facilities, and inability to ensure the safe treatment of certain kinds of waste. For these reasons, it is widely acknowledged by experts on ship recycling and the European Commission that the SoC do not provide the guarantee that the conditions at the yards are safe and environmentally sound.

“ ”

“This international convention rubberstamps shipbreaking on tidal mudflats and ignores labour rights and international rules for hazardous waste management. It will only serve the interests of shipping companies

to avoid paying the true cost of sustainable and ethical recycling and undercut efforts to level the playing field for responsible ship recyclers to compete. As it stands, the Hong Kong Convention undermines the

overall credibility of not only its own stated objectives, but also that of the IMO.”

Ingvild Jenssen, Executive Director and Founder - NGO Shipbreaking Platform

“ ”

“We encourage BW Offshore and BW Group to follow SBM’s example and ensure that their end-of-life fleet is managed exclusively in facilities that can ensure the highest environmental and social standards. Ship owners – and their brokers – have an obligation to conduct due diligence when selecting business partners. When safer alternatives to beaching exist, ignoring the social and governance failings in Alang and contributing to the greenwashing of an outmoded and polluting method for the sake of more money is simply not acceptable anymore.”

Ingvild Jenssen, Executive Director and Founder - NGO Shipbreaking Platform

“ ”

“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

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 majority of the workforce are migrant workers who come from Khyber Pakhtunkhwa, Punjab and Sindh. Many Rohingya, Bengalis and Burmese have also become part of the labour force in Gadani.

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. Gradually, the industry started to decline as a result of some government policies such as high taxation rates, increasing accidents which resulted in high number of deaths and injuries, as well as competition from the other South Asian shipbreaking destinations. In 2019, Gadani shipbreaking industry was generating less than one fifth of the scrap it used to generate in the 1980s.

Since the Covid-19 pandemic, the sector has significantly declined due to different socio-economic factors, including high interest rates of up to 20%, custom duties, falling demolition rates, smuggling of scrap steel from Iran, and governance issues between provincial and federal governments. This situation forced most of the workers to return to their home villages due to the lack of work at the yards. Yet, in 2022 and 2023, the Platform documented the stories of

six workers who lost their lives and two who suffered injuries. Despite the challenging economic crisis in Pakistan, this situation can potentially boost the country's financial and geo-economic sectors and incentivise the shipbreaking industry to move "off the beach."



"Shipbreaking activities at Gadani have now increased after a continuous downward trend following the 2016 accident. However, not much has changed to ensure that the industrial activity operates in a clean and safe way. 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



MONITORING THE PROBLEMS OF SHIPBREAKING IN BANGLADESH

WHAT IS THE ISSUE?

Even though the situation is appalling, in terms of tonnage the Chattogram yards in Sitakunda have become the world's top destination for end-of-life vessels. Concerns include dire working conditions, high fatality rates, exploitation of young 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. In the last decades, Sitakunda has often been in the headlines for its rapid and unplanned industrialisation as well as for accidents inside shipbreaking yards, steel re-rolling mills and other manufacturing plants. 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 2022 and 2023, the Platform documented the stories of 16 workers who lost their lives and 52 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. The

sector suffers from a serious lack of transparency, and it is expected that many accidents go unreported. There is often no ambulance available to transport injured workers to the closest specialised hospital, which is located one-hour drive away from the yards, and 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 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?

FUNDRAISING FOR INJURED WORKERS AND FOR ASBESTOS VICTIMS

In partnership with organisation Centre for the Rehabilitation of the Paralyzed (CRP), the Platform continued to fundraise to help afflicted workers from the shipbreaking sector that have suffered severe injuries, such as, amputations or serious spinal damage. Workers in many Bangladesh shipbreaking yards cut wires and pipes, blast through ship hulls with blowtorches, and haul scrap metal, without appropriate protective gear. Many are killed or seriously injured by explosions, crushed by falling chunks of steel, or burned by flammable gases, liquids, and other materials in the ships. Workers are also vulnerable to occupational diseases due to the exposure to toxic substances embedded within the ships' structure, including asbestos. Handling asbestos requires special training, specific protective equipment, and the use of decontamination equipment, which is not the case in the shipbreaking industry in Bangladesh. Early studies

show that shipbreaking workers exposed to asbestos have an elevated increased mortality due to lung cancer and other cancers compared to the general population. The Platform therefore supported workers suffering from asbestosis with daily treatment.

BANGLADESH: SHIPPING FIRMS PROFIT FROM LABOUR ABUSE

The NGO Shipbreaking Platform and Human Rights Watch published a joint report revealing that many European shipping companies are consciously sending their obsolete vessels to hazardous and environmentally damaging scrapyards in Bangladesh. The 90-page report "Trading Lives for Profit: How the Shipping Industry Circumvents Regulations to Scrap Toxic Ships on Bangladesh's Beaches", published in September 2023, finds that Bangladeshi shipbreaking yards often take shortcuts on safety measures, dump toxic waste directly onto the beach and the surrounding environment, and deny workers living wages, rest, or compensation in case of injuries. The report draws on interviews with 45 shipbreaking workers and workers' relatives and 10 doctors and experts on ship recycling and Bangladesh environmental and labour laws, as well as analysis of public shipping databases, company financial reports and websites, Bangladesh maritime import records, and leaked import certificates. Human Rights Watch wrote to 21 companies seeking a response to the findings,

including shipbreaking yards, shipping companies, flag registries, and cash buyers as well as the International Maritime Organization and four Bangladeshi government agencies. The report reveals an entire network used by ship owners to circumvent international regulations prohibiting the export of ships to facilities like those in Bangladesh that do not have adequate environmental or labour protections.



"The industry is surviving in Bangladesh because the western world has found a place to dump their toxic vessels without any accountability. Western countries are saving their beaches and people but exposing our sea, our beaches and our labourers to deadly consequences. No ship exporting country would ever allow toxic laden scrap vessels to be broken on their beaches with labourers having no adequate training on safety measures, no personal protective equipment, and no health monitoring."

Rizwana Hasan, Director of the Bangladesh Environmental Lawyers Association (BELA)

MONITORING THE PROBLEMS OF SHIPBREAKING IN TURKEY

TURKEY

Turkey dismantled 86 ships in 2022 and 66 in 2023. 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.

CHALLENGES AND FUTURE DIRECTIONS IN TURKEY

The NGO Shipbreaking Platform published its report *Ship Recycling in Turkey: Challenges and Future Direction* in December 2023. While the report provides a comprehensive analysis of the current challenges faced by the ship recycling sector in Aliğa, it also underscores the immense potential for driving forward sustainable ship recycling practices and demonstrates a clear path towards achieving this goal. Turkey stands at a crossroads as the upcoming expiration of public land leases in 2026 create an opening to bring needed change to its ship recycling industry. Ship's import. The protests and ban considerably raised awareness of issues in the ship recycling sector in Aliğa, including ongoing environmental breaches and poor working conditions. Following the mobilisation, several reports looking at protests during the campaign against São Paulo the problems of the ship recycling sector were issued by different institutions. The aircraft carrier was sent back to

Brazil where it was tragically sunk by the Brazilian navy.

Some of the key operational priorities highlighted in the report include putting in place effective drainage channels and the use of oil-water separators for waste water treatment. Additionally, there is a need for third-party verification of hazardous materials during dismantling, proper operations for hazardous waste removal, and the establishment of standards for secure pulling and lifting equipment, along with introduction of proper gas-free operations and cold-cutting techniques.

The report concluded that to ensure adequate oversight of the sector, a comprehensive Environmental Impact Assessment (EIA) is necessary. This assessment should define environmental licensing processes and enforce existing legal instruments for permitting and monitoring, taking into consideration both safety and environmental aspects. It is also important to continuously monitor the environment in and around ship recycling yards to identify sources of pollution and develop effective remediation strategies. Furthermore, occupational health monitoring is required to identify the underlying causes of accidents and work-related illnesses.

As stressed in the report, the lack of governance that allows yards to

operate without EIAs or adequate monitoring underscores the necessity for more frequent and unannounced EU inspections, including cross-referencing hazardous waste records and incorporating workers' perspectives and experience to inform evaluations. The future of ship recycling in Turkey hinges on investments and



“The Ministries of Environment, Labour and Transport should seize this opportunity to facilitate the transition of the ship recycling sector towards sustainable practices. To ensure the resilience of industry in Turkey, it is crucial that existing regulatory gaps are addressed through the implementation of forward-thinking and comprehensive legislation, and that investments and incentives to introduce safer and cleaner technologies, including cold cutting and dry docks, are mobilised.”

Ekin Sakin, Policy Officer - NGO Shipbreaking Platform



the adoption of better technologies to ensure safe and sustainable practices. In Aliğa, future developments should be determined by environmental impact assessments, cost-benefit analyses, and stakeholder consultations.



“From a marvelous public march with the participation of thousands of people in Aliğa to theatrical demonstrations in the center of İzmir and public statements in front of official buildings, all people came together around one single demand: to stop this toxic ship! Digital and conventional signature petitions reached more than 150.000 people within a month! The will and never-ending commitment of people forced policy makers to reconsider the mistake they had made.”

Gokhan Ersoy , Project Development Officer - Greenpeace Mediterranean

THE SAO PAULO SAGA

The aircraft carrier São Paulo was purchased by Turkish yard Sök from the Brazilian Navy on 18 March 2022 for recycling purposes. Due to the high toxicity of the ship, a campaign against the import in Turkey was launched by various organisations and political leaders, resulting in the Ministry of Environment revoking consent for the ship's arrival.

The ship's IHM received criticism for failing to identify significant amounts of asbestos, PCBs, and radioactive contamination. Only 12% of the ship's rooms had been inspected. The IHM for the São Paulo estimated 9.6 tons of asbestos, while by comparison the one of its sister-ship Clemenceau identified at least 600 tons. PCBs were not detected on the São Paulo, despite being commonly used in ship components at the time of its building and operation. Concerns were also raised about the vessel's contamination due to its involvement in atmospheric nuclear bomb testing and the presence of lead/ cadmium paint.

The protests and ban considerably raised awareness of issues in the ship recycling sector in Aliğa, including ongoing environmental breaches and poor working conditions. Following the mobilisation, the aircraft carrier was sent back to Brazil where it was tragically sunk by the Brazilian navy.

EU LIST

By the end of 2023, the EU List of approved ship recycling facilities, part of the EU Ship Recycling Regulation, included nine yards in Aliğa. The European Commission had de-listed two yards due to the lack of compliance with the Regulation requirements in December 2022. In order to make it on the EU list, the yards are subjected to on-site assessments of their environmental and safety performances.

Whilst two yards were, other non-compliant yards have been allowed to remain listed. Due to public pressure, the European Commission has now started to conduct unannounced inspections. Recognising the pivotal role of the European Union in driving improvements, strengthening the criteria for ship recycling, including waste management and steel recovery operations, under the EU Ship Recycling Regulation is crucial.

OTHER RECYCLING DESTINATIONS

EUROPEAN UNION

The European List of approved ship recycling facilities contains 48 ship recycling yards, 38 of which 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 prefer the higher profits offered by the beaching yards.

USA

In the US, there is currently one ship recycling facility located in Brownsville, Texas able to recycle vessels in a safer and more environmentally friendly way than on the beaches of South Asia. Similarly to the facilities in the EU, the US yard operates under capacity.

CANADA

Three years after initial protests and warnings, the infamous shipbreaking company Deep Water Recovery Ltd (DWR) persists in scrapping vessels at Union Bay, Canada, in blatant violation of international and national rules and standards. Despite multiple violations flagged by local authorities, DWR is dismantling toxic vessels at Baynes Sound.

Local residents, politicians and NGOs, who have strongly and repeatedly opposed these hazardous operations, keep urging government officials to intervene and protect the health of local communities and the marine environment.

BRAZIL

In a collaboration supervised by Petrobras, Brazilian steel company Gerdau S.A. and shipyard Ecovix have been entrusted with the responsible and environmentally sound recycling of the floating unit P-32, which has operated in the Marlim field of the Campos Basin.

This decision marks the first time a commercial vessel at the end of its lifecycle will be dismantled in Brazil. This significant move not only paves the way for the development of a recycling industry in Brazil but also sets an important precedent for the shipping and oil and gas sectors, encouraging other ship owners to adopt similar strategies for capacity building.

WE NEED YOUR SUPPORT TO FULFILL OUR MISSION!

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 7751 ships were beached in South Asia with a recorded data of at least 449 deaths and 404 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!

In collaboration with our partner in Bangladesh, 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. Join us in making a difference today!

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





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 their vessels and thus escape from law enforcement.

In an industry lobbying effort, the Hong Kong Convention (HKC) met the criteria for entering into force in June 2023, after ratification by Bangladesh and Liberia. Consequently, the Convention is set to become effective in June 2025. Already round 90 shipbreaking yards in Alang, India, are claiming compliance with 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.

Higher standards for safe and environmentally sound ship recycling already exist. The global community must address loopholes in the Hong Kong Convention and uphold the spirit of the Basel Convention. The shipping sector should internalise the costs for the recycling, supporting capacity building and implementing industry best practices.

WHAT IS COMING UP?

STRICTER RULES ON WASTE EXPORTS

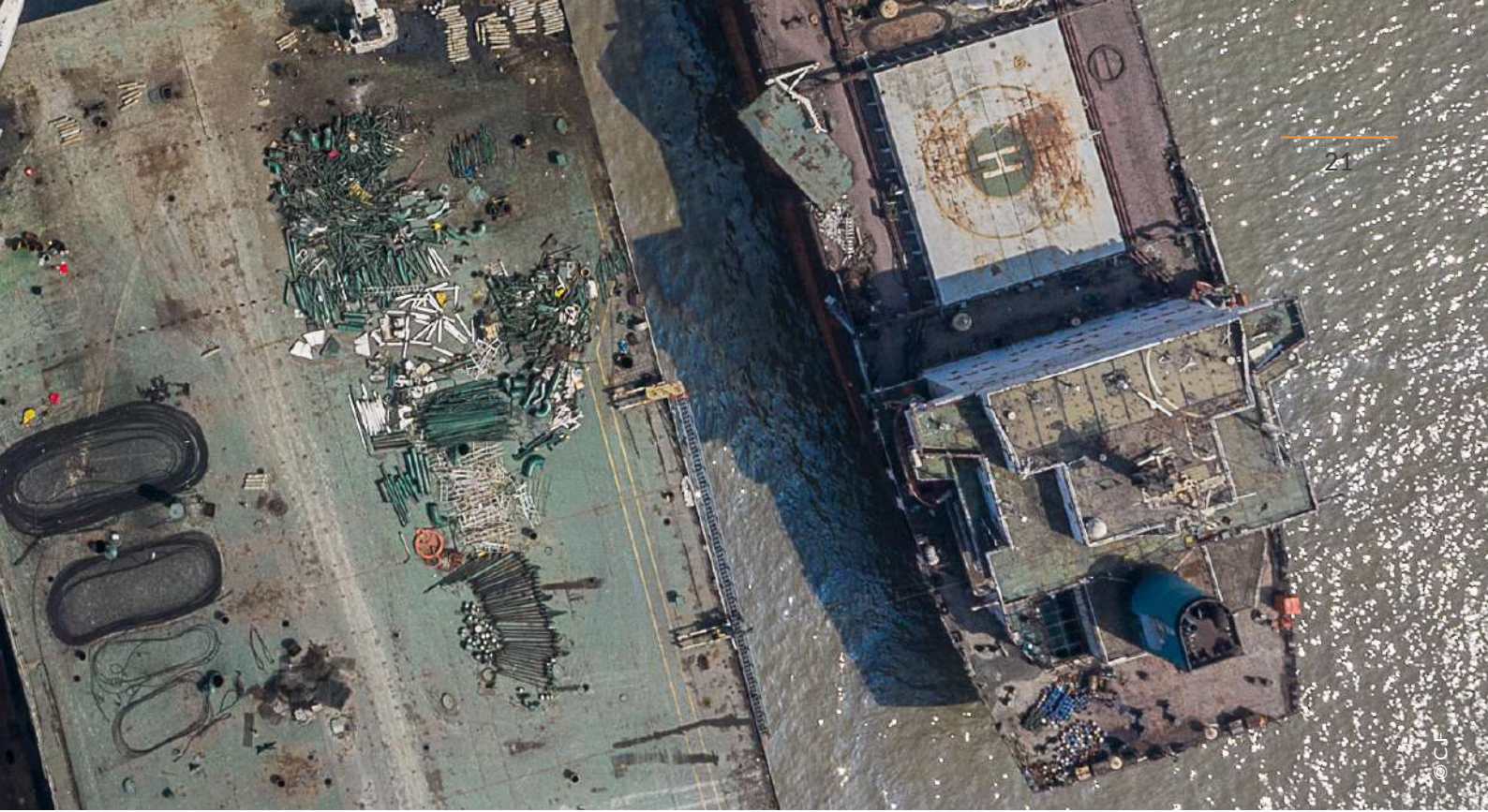
The new Waste Shipment Regulation reaches its final stages of the review procedure. The proposal, published in November 2021, states that EU-flagged vessels becoming waste in EU jurisdiction need to comply with the Basel Ban Amendment, which ban the export of hazardous waste from OECD to non-OECD countries.

Under the new agreed text, stricter rules on exporting waste are coupled with ESM checks of the receiving facility, stimulating recycling solutions in the EU block. The Regulation foresees the creation of a European group responsible for enforcing and strengthening cooperation against illegal exports

REVISION OF EU SRR

In light of the upcoming review of the EU Ship Recycling Regulation, there has been an evaluation process with a vast stakeholder engagement. The easy circumvention of the EU SRR and its limited scope call for drastic improvements and changes of the legislation, which are set to take place in 2024.

Inter alia, the NGO Shipbreaking Platform is advocating for extending responsibility to beneficial owners and for adopting a financial mechanism to incentivise shipping companies to choose approved recycling facilities for their end-of-life vessels. Crucial will also be the identification and adoption of best available techniques in ship dismantling and material recovery, ensuring the environmentally sound management of downstream materials, such as scrap steel.



CORPORATE DUE DILIGENCE

In 2022, the EU Commission introduced a proposal for the EU Corporate Due Diligence Directive, which aims to establish legal obligations for corporations to uphold human rights and environmental standards throughout their chains of activities.

The legislative journey has been arduous. In 2023, the path to enactment faced considerable hurdles

by the governments of France, Italy, and Germany, who made substantial amendments that significantly narrowed the scope of the legislation. This included the exclusion of approximately 70% of companies originally intended to be covered by the directive.

Moreover, certain sectors, such as finance, were exempted, along with

aspects related to product disposal, dismantling, and recycling. Yet, amid these alterations, this directive stands as a landmark in holding businesses accountable for their impact on both people and the planet. It underscores the importance of aligning business practices with ethical and environmental considerations. The Directive is set to come into effect in 2024.

MILESTONE

UAE TAKES IMPORTANT STEPS TOWARDS SUSTAINABLE SHIP RECYCLING

In December 2023, the United Arab Emirates (UAE) adopted a new Ship Recycling Regulation. The legislation requires a dry dock or equivalent infrastructures for environmentally sound ship recycling. Set to take effect from June 2025, this transformative legislation effectively brings about a ban on the beaching and landing of UAE-flagged vessels as well as all foreign vessels leaving or transiting through UAE waters enroute to scrap yards. The UAE's

new rules surpass the EU Ship Recycling Regulation by banning the landing method as practiced in Aliaga, Turkey.

They furthermore ban the re-flagging of vessels for the purpose of scrapping them at beaching or landing facilities. The introduction of the new UAE Ship Recycling Regulation marks a significant shift in maritime practices, especially concerning the common method of sending end-of-life vessels to cash

buyers in UAE waters before their final voyage to South Asian shores.

It's paramount to address the loophole of circumventing legislation by out-flagging, and crucially, to close avenues allowing the usage of the most hazardous ship recycling methods, such as beaching and landing. This new piece of legislation is vital not only for safeguarding the safety of workers but also for protecting ecosystems.



CLOSING THE LOOP SCRAP STEEL RECYCLING

UNLOCKING SUSTAINABLE MATERIAL RECOVERY FROM END-OF-LIFE VESSELS

Steel stands as the backbone of ship engineering and construction. The importance of steel in maritime construction is underscored by its durability and almost endless recyclability.

Estimates from industry experts reveal that ship scrap steel constitutes a substantial portion of a vessel's weight at the end of its life cycle. Figures range from around 70% for cruise ships to as high as 95% for tankers, with containerships falling in between. This steel, renowned for its superior quality, often comprises large, single sheets with a homogeneous composition, making it very attractive for recycling operations.

Acknowledged by experts at leading steel production companies like ArcelorMittal, ship scrap steel offers significant quantities of high-quality material, such as the demolition scrap type E3. This classification denotes

stability and low levels of undesirable metallic elements, ensuring its suitability for a range of applications. However, the journey of ship scrap steel from decommissioned vessels to its transformation into new products comes with challenges. Dangerous beaching shipbreaking yards in South Asia sell the retrieved ship scrap steel to numerous cold re-rolling mills. According to our research, the cold re-rolling sector in India operates through about 1800 SMEs collaborating with the yards. Similarly, in Pakistan, around 70% of ship scrap steel is sent to re-rolling mills in Karachi. In Bangladesh, around 90% of steel rolling mills rely on steel recovered from the shipbreaking industry. Some Bangladeshi yards also own re-rolling mills, allowing direct sales to the construction sector. Approximately 60% of raw materials for nearly 350 local steel industries are sourced from shipbreaking activities. Yet, the steel lacks proper cleaning prior to the re-rolling, making the handling of this steel a dangerous activity.

Paints, asbestos, and mercury, pervasive elements in ship construction, are often overlooked both at the yards and downstream. Torch-cutting activities release toxic fumes from contaminated steel, endangering workers and local communities alike. Moreover, the presence of heavy metals in ship paints poses health

hazards and environmental pollution, further exacerbated by inadequate cleaning processes. Cold re-rolling fails to address inherent flaws in the input material, resulting in products with compromised quality. While this approach reduces CO2 emissions compared to primary steelmaking processes, it falls short in maximising the potential of high-quality scrap.

According to the industry, optimal utilisation of scrap steel entails its remelting in Blast Furnaces (BF) or Electric Arc Furnaces (EAF), processes capable of addressing impurities and inconsistencies in the material. This not only ensures superior product quality but also minimises the environmental impact and energy consumption of the steelmaking process, aligning with the objectives of a circular economy and carbon reduction.

Disparities in scrap prices are the main obstacle preventing ship owners from moving away from dangerous beaching to sustainable practices. For example, the beaching yards in South Asia paid shipowners an average of 500-600 USD per 'light displacement tonne' (LDT), compared to 250 USD/LDT in Turkey, and 150 USD/LDT in Europe. Such huge differences in scrap prices reflect the lack of internalisation of occupational health and safety measures and pollution control,



including poor or no management of the many hazardous materials on board end-of-life vessels. In South Asia, the workers, the environment, and the local communities are paying the price of dirty and dangerous scrapping, while ship owners, cash buyers, and shipbreaking yard owners are cashing in considerable profits.

In Turkey, ship scrap steel recycling is carried out mainly in steel plants (BF and EAF) in the area of Izmir. While facilities report their emissions and compliance checks are conducted, there is a lack of public access to the measured parameters, raising concerns about transparency. Iron and steel plants in Turkey are identified as significant sources of PCBs in the air and soil, as per Turkey's National Plan to the Stockholm Convention. Scientific research conducted in Aliğa has indicated excessive pollution in the area, including emissions from steel plants. Measurements of PM10 and PM2.5 within the industrial zone impacted by iron and steel plants have shown critically high levels.

In Europe, the industry is advocating for including scrap steel in the list of Critical Raw Materials and investigating a green steel market. As in other steelmaking countries such as the USA, Brazil, or South Korea, there is a political push to retain good quality

scrap steel within the borders to reduce import dependency. However, issues concerning the efficacy of steel recycling persist: better segregation of scrap, decontamination of the scrap from hazardous waste (asbestos, chromium-6), and a clear plan to transition to EAF technology are needed. For many countries, the shift towards secondary steelmaking processes using scrap steel represents a pivotal step in achieving sustainability goals and fostering a circular economy. The reliance on imported scrap steel undermines the self-sufficiency of major steel-producing nations and hampers efforts to decarbonise industrial processes.

In conclusion, while global demand for scrap steel is on the rise, responsible recycling of scrap steel holds the potential to revolutionise ship recycling practices. By helping to build capacity in safer industrial sites, it can simultaneously support positive legislative developments. The emerging concept of "Green Steel" extends beyond mere consideration of GHG emissions to encompass the highest standards of ESG performance. ESG indicators must be applied when assessing the sources of raw materials. As countries transition from net exporters to net importers of scrap steel, the imperative to optimise domestic recycling capacities becomes

apparent. Embracing innovative technologies and stringent regulations can foster a more sustainable approach to steel production, one that maximises the potential of recycled materials while minimising environmental harm.



"One of the main benefits for the steel industry is that for every tonne of carbon steel scrap recycled, a saving of 1.4 tonnes of CO₂ is achieved. In the case of stainless steel scrap, the saving of emissions is even bigger, close to 5 tonnes of CO₂. The use of scrap also helps to preserve virgin raw materials, energy and water. It also reduces air, soil and water pollution when processed and utilised in an environmentally sound manner."

Eurofer – European Steel Association



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.

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,"

MILESTONE O&G SECTOR LEADING THE WAY

Major Brazilian energy company Petrobras, which has been under the spotlight for the dirty and dangerous scrapping of several assets on South Asian beaches in the last decade, has achieved a significant milestone in its new commitment to sustainable ship recycling with the successful conclusion of the auction for the disposal of a floating offshore platform in Brazil. The sale of the floating unit P-32, which

has operated in the Marlim field of the Campos Basin, took place on 7 July 2023. In a collaboration supervised by Petrobras, steel company Gerdau S.A. and shipyard Ecovix have been entrusted with the responsible and environmentally sound recycling of the platform. Just a few months prior, the oil and gas giant announced the adoption of a new policy mandating the recycling of vessels only in facilities equipped

with dry-docks or impermeable surfaces with drainage systems.

This off the beach stance places the company among an increasing number of responsible ship owners, including competitors SBM Offshore and Shell, that are choosing facilities with infrastructure enabling the safe and environmentally sound management of their end-of-life assets.



investors are using the annual lists that the Platform publishes on global dumpers to screen their asset values.

CALL TO ACTION FOR CONTAINER SHIP-PING

As the number of vessels reaching the end of their operational lives continues to rise, the NGO Shipbreaking Platform has taken proactive steps to engage sustainability and fleet managers in promoting responsible ship recycling. Through a targeted letter campaign, we have sought to address the practices of the worst corporate offenders, highlighting the irreversible environmental and human health consequences of beach ship scrapping. Highlighting the lack of compliance with international and regional legal frameworks, we call for new corporate policies linked to best practices and the collaboration with the steel sector for responsible ship steel recycling.

FSO SAFER

The NGO SBP has partnered with Greenpeace International, the International Federation of Human Rights (FIDH) and the Basel Action Network (BAN) to advocate for the responsible recycling of the deteriorating FSO Safer, located near the Yemen coast. The organisations have raised alarms to UNDP, managing the project, and the Dutch Government, one of the major donors of the Stop Red

Sea Oil Pollution operation, regarding the potential peril of the FSO being dismantled at one of the infamous South Asian shipbreaking yards.

Highlighting the risks posed by the vessel's toxicity, the NGOs stress the necessity of safeguarding human health and the environment by ensuring that the recycling of the FSO Safer takes place in a facility that upholds international labour rights, employs methods to fully contain pollutants and possesses the capability to manage all hazardous materials on board in a safe and environmentally responsible manner. They strongly recommended that the UNDP adhere to the standards outlined in the UN Basel Convention, which governs the transboundary movement and disposal of hazardous waste.

WORST SHIP-DUMPING COMPANIES

2022

BERGE BULK	■■■■■■■■■■	BERMUDA
NORDIC AMERICAN TANKERS	■■■■■■■■■■	UNITED STATES OF AMERICA
BUANA LINTAS LAUTAN TBK PT	■■■■■■■■■■	INDONESIA
ABU DHABI NATIONAL OIL CO	■■■■■■■■■■	UNITED ARAB EMIRATES
XIHE HOLDINGS	■■■■■■■■■■	SINGAPORE
WINSON OIL TRADING PTE LTD	■■■■■■■■■■	SINGAPORE

2023

MEDITERRANEAN SHIPPING COMPANY (MSC)	■■■■■■■■■■	SWITZERLAND
SINOKOR	■■■■■■■■■■	SOUTH KOREA
TRANSWORLD GROUP	■■■■■■■■■■	UNITED ARAB EMIRATES
EVERGREEN	■■■■■■■■■■	TAIWAN
MOLLER AP – MAERSK	■■■■■■■■■■	DENMARK
GREEN REEFERS	■■■■■■■■■■	NORWAY
HARINSUIT TRANSPORT CO LTD	■■■■■■■■■■	THAILAND
PK GROUP	■■■■■■■■■■	THAILAND



ORGANISATIONAL DEVELOPMENT A VIBRANT GLOBAL NETWORK

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.

COLLABORATION TO SUPPORT INJURED WORKERS

The Centre for the Rehabilitation of the Paralyzed (CRP) in Bangladesh and the NGO Shipbreaking Platform have established a long-lasting partnership. Given CRP's dedication to comprehensive rehabilitation, and holistic support services, this collaboration aims to extend crucial rehabilitation support to shipbreaking

workers who suffered injuries in accidents at the shipbreaking yards, ensuring they receive the necessary rehabilitation. By facilitating access to rehabilitation services, we aim to enhance their livelihoods to the fullest extent possible.

PARTNERSHIP EVENT WITH PORTUGUESE NGOs IN LISBON

On 31 May 2023, NGOs ZERO, Sciaena, NGO Shipbreaking Platform and Circular Economy Portugal organised the conference "Waves of change: towards circular and sustainable shipping" at Casa do Impacto in Lisbon. The international event focused on the sustainability and circularity of the maritime sector, focusing on the entire ship's life cycle. The event was held in English and included three panel discussions on ship design and ship building, ships' operations and ship recycling, and a networking session.

ANNUAL GENERAL MEETING

The Secretariat successfully organised its Annual General meeting in May 2023 in Lisbon. During two days, the plenary and thematic sessions focused on updating the members on the work done by the Secretariat to hold industry accountable and to promote best practices. The meeting provided a good opportunity for members to share their latest achievements. The AGM also included a site visit at ship yard LISNAVE ESTALEIROS NAVAIS S.A, located near Lisbon. LISNAVE is one of the world's leading ship repair companies and is planning to recycle vessels in dry docks in the near future.



RESPONSIBLE CIRCULARITY

27

PANEL

TESS DOEZEMA - University of Vigo

MICHAEL BRAUNGART - Leuphana University Lüneburg and EPEA

PATRIZIA HEIDEGGER - European Environmental Bureau (EEB)

FREDRIK BARTH - Nordic Circles

MODERATOR

DAVID JOHNSON - SERA Architects

SHIP RECYCLING LAB

SHIP RECYCLING LAB ROTTERDAM 2022

Stakeholders that are pioneering a new future for sustainable ship recycling gathered in Rotterdam at the NGO Shipbreaking Platform's Ship Recycling Lab: Transformation through Innovation. New technologies, ethical circular economy models, strategic policies for the steel industry, and many more topics linked to ship demolition, ship design, waste management and material recovery were discussed during the two-day event.

The current industrial and political shift to a circular and low-carbon economy has brought ship recycling to a turning point. Participants at the Lab showcased how they are seizing new opportunities for innovation created by the momentum for green and regenerative design, production and end-of-life management.

Circular Maritime Technologies International BV (CMT) chose the Lab

to share its new cutting technology, which is transferable to any facility and reduces the vessel's size in several automated steps.

Founders of Leviathan GmbH, Simeon Hiertz and Karsten Schumacher, announced at the Lab their cooperation with German Naval Yards on facilitating clean and safe ship recycling in Kiel. The technology developed by Leviathan, which includes the use of robots and cold water cutting techniques, will be available to owners of large vessels in a dry dock of 426x88m.

Head of Climate Change and Governmental Affairs at ArcelorMittal Europe, Stephane Tondo, also speaking at the Lab, stated that the green transition will require the decarbonisation of steel production. According to EuRIC, using one tonne of sustainably produced scrap saves at least 1.67 tonnes of CO₂. Increasing

the share of scrap in steel production and ensuring proximity to raw materials are key strategies to ensure decarbonisation, said ArcelorMittal. The latter revealed its cooperation with CMT for the possible development of a new ship recycling facility in Gent, Belgium, close to its steel plant. Noting that the European Union (EU) will soon become a net importer of scrap, ArcelorMittal is now looking for additional partnerships with recyclers close to its other steel plants in the EU in order to ensure access to good quality scrap steel from vessels.

After the successful organisation of the first edition of the Ship Recycling Lab: Transformation Through Innovation, the NGO Shipbreaking Platform, still recognising the need for visionary solutions for ship recycling, is ready to host its second edition of the Lab on 9 -10 October 2024 in Lisbon, Portugal.

RAISING AWARENESS CAMPAIGN LISBON 2023

In Spring 2023, the NGO Shipbreaking Platform organised in Portugal a series of cultural initiatives aimed at raising awareness on the topic of shipbreaking.

Fifteen powerful images were pasted on selected walls of the city of Lisbon. Via visual storytelling, the project not only showed how the huge metal skeletons of old vessels are still dangerously stripped apart on the shores of the Global South but also opened a window into the lives of the exploited workers and vulnerable local communities, denouncing the illegality of this toxic trade. The Platform also organised two live performances at Largo Residências and at MAD - Marvilla Art District. Live music, visuals and theatre were combined by artists Serenella Martufi and Isacco Chiaf to provide a comprehensive overview of the issue through a unique multimedia format.

Both projects were based on the multimedia work *With Bare Hands*, created by award-winning photojournalist Tomaso Clavarino and videomaker Isacco Chiaf in 2016.

The campaign saw the financial support of private donors and the partnership of several local and international entities.

PARTNERS

Circular Economy Portugal, Human Rights Watch, Illusive Studios, Largo Residências, MAD - Marvilla Art District Sciaena, Sciaena, SOS Amianto, ZERO.

SUPPORTERS

Ghost Creative Productions, Câmara Municipal de Lisboa, Polo Cultural Gaiotas - Boavista, Junta de Freguesia da Misericórdia



© Sanjay Tomar / Greenpeace India 2023

FINANCIAL STATEMENT

INCOME	2022	2023
Membership fees and members' contributions	2.000	500
Maribel	41.010	49.815
European Commission	296.360	311.872
Foundations	50.417	37.702
Other	-	10.421
LAB	124.931	-
Corrections	(19.750)	-
TOTAL INCOME	494.967	410.310
EXPENDITURE	2022	2023
ACTIVITIES		
Travel costs	7.323	4.444
Communication Material	5.614	4.382
LAB	99.717	-
Public Awareness and Data Collection in South Asia	18.821	51.382
TOTAL ACTIVITIES	131.475	60.208
STAFF		
Salaries and social charges	291.712	308.109
Other Salary coasts	5.242	9.664
SUB-TOTAL STAFF	296.954	317.773
GENERAL COSTS		
Rent	5.331	5.578
Office costs	637	655
Communication costs	2.765	2.026
Other costs	11.389	9.519
Subscriptions	8.112	9.946
External Costs	1.854	-
TOTAL GENERAL COSTS	30.088	27.724
Contributions to the reserves	36.450	4.605
TOTAL EXPENDITURE	494.967	410.310

WHO WE ARE



INGVILD JENSSEN
Founder and
Executive Director

NICOLA MULINARIS
Senior Communication and
Policy Advisor

SARA COSTA
Project Officer

BENEDETTA MANTOAN
Policy Officer

EKIN SAKIN
Policy Officer

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 organizations 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 Aliağa, 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-kengukwai) 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

NGO Shipbreaking Platform
Rue de la Linière, 11
BE - 1060 Brussels
Phone : +32 2 6094 419
www.shipbreakingplatform.org

