NGO SHIPBREAKING PLATFORM

SOUTH ASIA QUARTERLY UPDATE

#43

VISION & MISSION

Vessels are recycled in facilities that ensure clean, safe, and just practices that provide workers with decent jobs. Vessels will be toxic-free and no longer cause harm to workers, local communities, or the environment at end-of-life.

To act as a catalyst for change by effectively advocating for clean, safe, and just ship recycling globally. This necessitates denouncing dirty and dangerous practices, such as the dumping of end-of-life vessels on the beaches of developing countries. Our commitment to finding sustainable global solutions is based on the respect of human and workers' rights and the principles of environmental justice, producer responsibility, 'polluter pays', and clean production.

OCTOBER 2025
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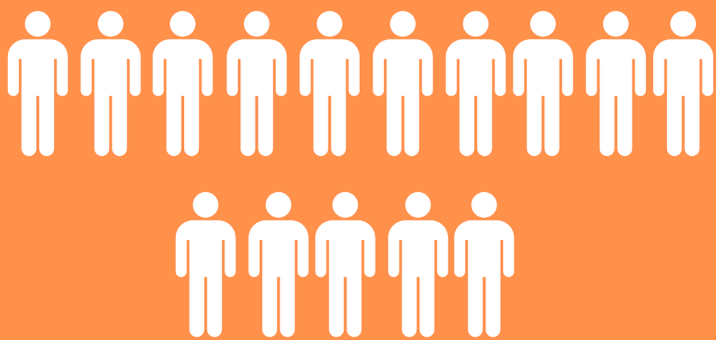
In this quarterly publication, we inform about the shipbreaking practices in South Asia, providing an overview of accidents that took place on the beaches of Bangladesh, India and Pakistan, relevant press media as well as research. We aim to raise public awareness about the many negative impacts of shipbreaking in South Asia as well as developments aimed at the protection of workers' rights and the environment.

workers suffered an accident

15

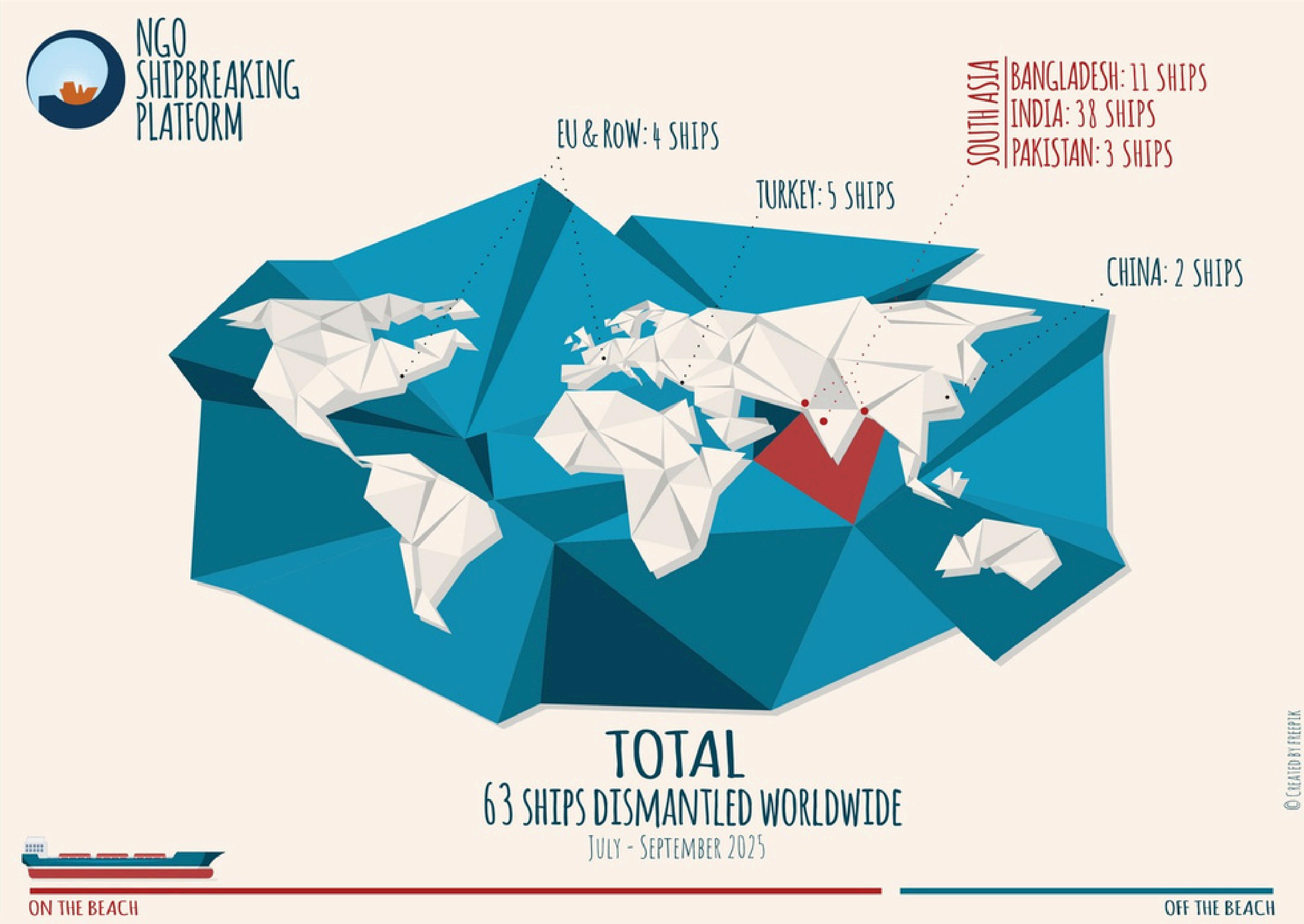
shipbreaking beaches

workers suffered an accident while scrapping ships on South Asian beaches



03

SHIPBREAKING RECORDS



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ACCIDENTS

Improving safety and transparency in the shipbreaking sector is crucial to prevent accidents and protect workers' well-being. Currently, accidents are reported by the Platform based on local sources and media reports. However, as the sector suffers from a serious lack of transparency, many incidents likely go unreported, particularly in Bangladesh, India and Pakistan, where authorities and industry fail to publish data. Moreover, the absence of data on occupational diseases, including cancer, further exacerbates the lack of accountability towards workers and leads to the workers being exposed to toxics unknowingly on a daily basis.

BANGLADESH

On 19 July, Abu Sukkur (23) died while working as a cutter man at Chittagong Shipbreaking and Recycling Industry yard. The worker fell ill during his shift, and was taken to a hospital, where he was declared dead. At the time of the incident, he had been working in the dismantling of the PIA (IMO 9075333), a vessel owned by South Korean company Hyundai LNG Shipping Co. A month later, on 21 August, Allaudin (44), a trader of old industrial cables, lost his life while visiting the same yard. An official of the Chittagong Shipbreaking and Recycling Industry yard said that Allaudin has visited the yard to purchase materials and suddenly fell ill during the visit. They took him to a private hospital where he was declared dead. Local sources as well as the Shipbreaking Workers' Trade Union claim that the businessman fell from the ship. Fazlul Mintu, from the Trade Union, added: "He was not wearing any safety gear at the time. We demand a proper investigation into the incident". Weeks later, on 4 September, again another worker, Prodip (30), was injured while dismantling the same vessel. Prodip is a fitter man working inside the ship, and got injured when an iron plate fell on his head. Accidents involving South Korean companies have been frequent, and the NGO Shipbreaking Platform has repeatedly called for South Korean companies, including Sinokor, H-Line, SK Shipping, to stop the practice of dumping their vessels on the beaches of South Asia.

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On 27July, Nazmul Haque Palash (35) suffered a severe head injury after an iron plate fell on his head. Nazmul was part of the fitter group working at Jiri Subedar yard. The vessel involved, the BANGLAR JYOTI (IMO 8508943), belonged to the Bangladeshi government. In response to this incident, the Shipbreaking Workers' Trade Union Forum and the Shipbreaking Workers' Safety Committee issued a public statement expressing concern over the accident and urged "*that every phase of shipbreaking must be regularly monitored to eliminate safety gaps, that each accident must be thoroughly investigated to prevent recurrence, and that those responsible—whether individuals or authorities—must be brought under legal accountability.*"

On 16 September, eight workers — Dulal Hossain, Hafizur Rahman, Anwar Hossain, Mukter Sheikh, Sohidur Rahman, Md Faruk, another Dulal Hossain, and Hanif Ali — suffered burn injuries on the same ship at the same yard. The fire is believed to have originated from flammable liquid substances, when at least sixteen workers from the oil remover group were working inside the engine room. The accident cause is under investigation. According to the Department of Inspection for Factories and Establishments' (DIFE) officials, two of the workers sustained burns over approximately 25% of their bodies, five suffered burns covering around 10%, and the extent of burns for one worker has not yet been determined. The injured workers are currently receiving treatment at two private hospitals, with medical expenses covered by the yard authorities.

On 10 August, Md Faruk (48) was injured in a blast occurred at King Steel Shipyard owned by K.R. Ship Recycling Industries. The blast was due to a gas pipe explosion. The ship involved was the TRADER III (IMO 9213416). According to data maritime bases, the ship was owned by Capital Maritime Trading Corp linked to Greek magnate Evangelos M Marinakis. Md. Faruk was transported to Chattogram Medical College Hospital. He suffered burns on 16% of his body. In a joint statement, the Shipbreaking Workers Trade Union Forum and the Shipbreaking Worker's Safety Committee expressed "*deep outrage and strong condemnation*". The leaders also said that it is "*deeply regrettable and unacceptable*" that these incidents keep happening after the entry into force of the Hong Kong Convention (HKC).

On 7 September, Kamal (40) sustained injuries to his head, hands, and leg after falling from a ship at Jamuna Shipbreaking Yard. Kamal was part of a cutter group.

On 15 September, Moslim Uddin (48), suddenly died while working at S.N.T. Shipbreaking Yard.

DEVELOPMENTS IN BANGLADESH

ADVISOR TO THE SHIPPING MINISTRY ADMITTS RELOCATION OF THE INDUSTRY

The Advisor of the Ministry of Shipping, M Sakhawat Hussain, visited a shipbreaking yard in Chattogram, and declared that the shipbreaking yards with no Statements of Compliance (SoC) with the HKC will have to cease their operations. He also added that Bangladesh will seek an extension for the shipbreaking yards to receive a SoC. During his visit, the Advisor opened up to the possibility of relocating the sector away from Chattogram. He added: “When terminals are developed, they occupy a large area. Look at how much the Chattogram Port has expanded. So, it may not be feasible to have up to 150 yards here anymore. We must look for alternative locations.”. Bangladesh had announced that it would no longer issue No Objection Certificates (NOCs) to yards that fail to have a SoC with the HKC. The Bangladeshi government is amending the Ship Recycling Act 2018 and Ship Recycling Rules 2011, and targets to have over 60 HKC-compliant yards by 2030.

FIRE AT A SECOND-HAND MARKET AT THE SHIPBREAKING AREA OF CHATTOGRAM

On 15 August, a devastating fire broke out at the shipbreaking goods market in Bhatiary, Chattogram destroying at least five shops. The fire was caused by an electrical short circuit. The Chattogram Fire Service Deputy said: "*The shops contained flammable materials, which made it difficult to control the fire initially. Later, three firefighting units managed to douse it by 11:15pm*.". This is also a proof of the constant dangers faced by communities living and working in the vicinity of the shipbreaking yards.

DEVELOPMENTS IN INDIA

SANCTIONED VESSELS DISMANTLED IN ALANG

Shipbreaking yards in Alang are struggling to deal with sanctioned vessels because banks are refusing to issue letters of credit needed to buy and dismantle them. These ships — mostly old oil tankers — have been accused of transporting sanctioned oil from Iran or Russia in their final years. As US sanctions expand, many of these "*shadow fleet*" vessels can no longer operate and are being sent to Alang for scrapping. While ship recyclers are tempted by the low prices of these ships, the tighter scrutiny and lack of financing make it difficult for owners to sell them. The widening scope of sanctions now targets individual business owners as well. In April, for example, the US sanctioned Indian shipping magnate Capt. Jugwinder Singh Brar for violating restrictions on Iranian trade. This growing wave of sanctions evasion is raising risks across the global maritime industry — increasing compliance burdens, complicating financial transactions, and threatening disruptions to shipping routes. Data shows that 15 tankers were scrapped between 2024 and 2025, with 8 linked to direct or indirect sanctions.

DEVELOPMENTS IN PAKISTAN

SHIPBREAKING INDUSTRY IN PAKISTAN IN THE PROCESS OF BECOMING FORMALLY RECOGNISED

Recommended by the Ministry of Maritime Affairs, the Economic Coordination Committee (ECC) of the Cabinet in Pakistan is in the process of formally recognising the shipbreaking industry in Gadani as an official sector. With the formalisation of the industry, the Balochistan government, with federal support, has approved a Rs12 billion project to upgrade the sector. The project aims to enhance workplace safety and environmental safeguards, to establish systems for the safe disposal of hazardous materials, and includes "*a 30-bed hospital, a rescue centre, a fire station, a school, a park, as well as water, sewage and road infrastructure*". In parallel, the International Labour Organisation (ILO) launched a diagnostic study of Pakistan's shipbreaking industry value chain to improve safety, health standards, gender inclusion, and environmental practices in the sector. The project is also focused on downstream industries that use recovered materials from dismantled ships. These include metalworking, component fabrication, and recycled material processing. The study is part of the ILO-International Maritime Organisation (IMO) project "*Safe and Environmentally Sound Ship Recycling and Decent Work.*"

PAKISTAN'S SHIPBREAKING INDUSTRY AT A CRUCIAL STAGE: AN UPDATE"

Pakistan emerged as a global leader in shipbreaking during the 1960s, reaching its peak in the 1980s, with the sector contributing to over 80% of the country's re-rolled steel needs, generating fiscal revenues, and providing employment to thousands in the coastal belt of Balochistan. Despite its economic benefits, shipbreaking has long been linked with environmental degradation, marine pollution, occupational health hazards, hazardous labour conditions, regulatory gaps, and outdated dismantling practices. Inadequate waste management and hazardous dismantling practices have led to coastal contamination and elevated risks of exposure to harmful substances such as asbestos, heavy metals, and persistent organic pollutants. Recent studies highlight Gadani's significant contribution to air pollution, with passive air sampling detecting elevated levels of polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and short-chain chlorinated paraffins (SCCPs) near shipbreaking yards. Molecular diagnostics confirmed that these pollutants predominantly originate from dismantling activities, confirming the urgent need for environmental safeguards. The damage to soils and waters is equally stark, with over 20,000 tons of hazardous waste released annually into the ecosystem. This environmental degradation diminishes marine biodiversity and reduces fish stocks, impacting coastal livelihoods dependent on small-scale fishing.

Nowadays, the country remains the world's third-largest shipbreaking nation, following India and Bangladesh, in terms of both scrapped tonnage and the number of vessels dismantled annually. Yet, the industry in Pakistan has faced a significant decline in recent years, challenged by high interest rates of up to 20%, the imposition of customs duties by the government, stricter regulatory inspections, smuggling of scrap steel from Iran, and persistent political frictions between provincial and federal bodies.

Since its inception, Pakistan's shipbreaking industry has operated informally. It is only in 2025 that the government has begun moving toward formal recognition of the sector. The Minister of Maritime Affairs recently announced the establishment of a National Centre of Excellence in Karachi to promote green ports, shipping, and maritime industries through research, training, and innovation. According to the Pakistani media, eleven yards are now nearing completion for "*eco-friendly*" operations, while an additional twenty yards are set to begin "*green recycling*" by June 2026. Yet, this raises an important question: what exactly do governments mean by "eco-friendly" and "green recycling"? What criteria are being applied to define these terms, and how do they compare with international standards?

CIRCULAR AND BLUE ECONOMY

Circular economy (CE) is an economic model that seeks to minimise waste, extend product lifecycles, and reduce reliance on finite resources. It promotes reuse, repair, refurbishment, and recycling within closed-loop systems, thereby lowering environmental impacts from resource extraction and waste. Central to CE is designing products for longevity and sustainability, aligning economic development with reduced ecological harm. Circular economy frameworks advocate for resource efficiency, pollution minimisation, safe dismantling protocols, and sustainable material recovery throughout supply chains. Instead of traditional linear ship dismantling processes, CE models emphasise reusing, repurposing, and recycling ship materials to reduce environmental and social costs while promoting green industrial practices. Integrating CE into ship recycling operations would mitigate environmental and human health risks, improve compliance with international environmental agreements, and unlock new economic opportunities via resource efficiency, improved global market access, and enhanced investment flows. It is estimated that 95% of a ship's mass can be recycled if supported by appropriate infrastructure and technology, making it both a challenge and an opportunity in the regional ship recycling landscape.

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In recent years, the Blue Economy has emerged globally as a reference for the sustainable use of ocean resources to promote economic growth, improve livelihoods, and create jobs—while preserving the health of marine ecosystems. Economic globalisation is increasingly shifting attention from land-based economies to ocean industries, making the "Blue Economy" a central pillar of sustainable growth. With its 1,046 km coastline, Pakistan holds vast potential in maritime trade, fisheries, logistics, energy, tourism, and digital connectivity. Developing this sector could not only generate significant foreign exchange but also provide improved livelihoods for coastal communities. The country's recent acquisition of the "Blue Economy" trademark marks an important step toward formalising and advancing this vision.

STAKEHOLDERS CONSULTATION IN PAKISTAN

The Sustainable Development Policy Institute (SDPI), an independent NGO based in Islamabad and a member of the NGO Shipbreaking Platform, provides expertise in policy analysis, advisory services, and development interventions. With a mission to promote sustainable development through peace, social justice, and intergenerational well-being, SDPI advocates for safer and more sustainable practices in Pakistan's shipbreaking industry.

On 20 March 2025, SDPI organised a multi-stakeholder consultation titled "Circularity in the Marine Environment and Sustainable Ship Recycling in Pakistan." The event brought together industry leaders, policymakers, environmental experts, academics, regulators, and representatives from international organisations and the private sector. Discussions focused on three themes:

- Circularity in Marine and Ship Recycling
- Policy and Regulatory Frameworks
- Financing and Innovations

The consultation outcomes were documented and synthesised with secondary sources, including academic literature, policy papers, and global case studies. KEY CONCLUSIONS included:

- Persistent pollution from dismantling activities undermines socio-economic resilience in Balochistan's coastal communities.
- Labour insecurity remains widespread: most workers lack contracts, health insurance, or accident compensation, creating systemic rights violations and hindering workforce development.
- Social exclusion is compounded by inadequate housing, poor public services, and limited community health infrastructure.
- Infrastructure gaps prevent Pakistan's yards from complying with international standards such as the Hon g Kong Convention (HKC) and the EU Ship Recycling Regulation.
- Legal principles like "producer liability" and "polluter pays" exist in theory but are inconsistently applied in the maritime sector, often falling beyond the effective control of flag States.
- Regulatory fragmentation persists: domestic frameworks are constrained by weak enforcement, limited trained inspectors, lack of yard monitoring systems, insufficient hazardous material audits, and an absence of clear financial penalties for non-compliance.
- Opportunities for modernisation exist: advanced cutting technologies, block chain-based material passports, climate finance mechanisms (e.g., green bonds, international grants, public-private partnerships), and critical infrastructure upgrades such as effluent treatment plants, dust suppression systems, and hazardous waste segregation units could transform Pakistan's shipbreaking sector into a safer, greener, and more competitive industry.

Building on the insights from the stakeholders consultation, sectoral analysis, and international benchmarks, the following STRATEGIC POLICY RECOMMENDATIONS were proposed to strengthen circularity and sustainability in Pakistan's ship recycling industry.

1.Regulatory Alignment with International Conventions	- Update Pakistan's Ship Recycling Regulations and the Merchant Shipping Ordinance. - Incorporate international obligations such as the Inventory of Hazardous Materials (IHM) and Green Passport protocols. - Establish an Inter-Agency Regulatory Harmonisation Committee under the Ministry of Maritime Affairs to ensure coherence across relevant institutions.
2. Mandatory Hazardous Material Inventories & Compliance Protocols	- Require all end-of-life vessels to submit a certified digital IHM before entering recycling facilities, in line with International Maritime Organisation standards. - Define clear compliance protocols, including submission deadlines, third-party verification, and penalties for violations. - Equip Port State Control and the Pakistan Maritime Security Agency with specialized training and digital enforcement tools to verify IHMs and ensure compliance.
3. Financial Incentives for Green Ship Recycling	- Introduce targeted fiscal incentives such as VAT exemptions and accelerated depreciation benefits for compliant and eco-friendly yards. - Establish a dedicated Green Ship Recycling Fund through the State Bank of Pakistan to provide concessional loans and credit guarantees for safer, mechanized dismantling systems. - Leverage blended finance with the Green Climate Fund and other development partners to scale investments.

4. Public-Private Partnerships (PPP) to Scale Innovation & Compliance	- Launch a standardised PPP framework to encourage joint investments in pilot green recycling hubs. - Engage multilateral development banks (ADB, World Bank) for technical assistance in structuring and monitoring PPP projects. - Create an Innovation Consortium uniting recyclers, technology developers, and research institutions to co-develop and validate advanced dismantling technologies.
5. Infrastructure & Capacity Enhancement at Major Yards	- Establish a National Ship Recycling Modernisation Fund to support capital investments in advanced dismantling technologies, environmental controls, and worker safety systems.
6. Integration of Marine Circularity into the National Circular Economy Roadmap	- Embed marine circularity within Pakistan’s national economic and climate policies. - Form an Inter-Ministerial Circularity Taskforce to align ship recycling with waste management, climate resilience, and industrial strategies. - Publish an annual Marine Circularity Index, overseen by the Ministry of Climate Change, to track progress, ensure transparency, and guide evidence-based adjustments.

NEW OPPORTUNITIES ON THE HORIZON

The Chinese company Shandong Xinxu Group Corporation, a high-tech energy enterprise, is interested in setting up an integrated maritime industrial complex at Port Qasim, situated 50 km east of Karachi and Pakistan's second busiest port, together with a "green ship recycling yard" that adheres to environmentally responsible recycling practices. The investment of the Chinese company in Pakistan is receiving the full support from the Pakistan government, although the financial plan is not yet finalised. The project focuses on port operations linked to shipbuilding, ship repair and ship recycling. The Pakistani media outlet Daily Independence mentioned that "the proposed "green" shipbreaking yard would be designed to meet international environmental and safety standards, in contrast to the troubled Gadani ship-breaking yards, which have faced repeated criticism over labour and pollution concerns.". This investment could mean the opportunity for Pakistan to be the game changer in ship recycling in South Asia, by choosing to bring ship recycling practices OFF THE BEACH and operate an industrial platform in which the entire life cycle of the ship would be done in one place: from the design and construction, to repair and recycling.

There is an urgency for Pakistan to transition from conventional, and outdated shipbreaking methods to a circular economy-based model. By embracing circularity, Pakistan can reduce its ecological footprint, unlock new economic opportunities, enhance labour protections, and strengthen its position in the global maritime economy.

RESEARCH AND READINGS

November 2025

Zobaer Masum, Md. Yeamim Aftad, Md Anisuzzaman, Mohammad Belal Hossain, Tasrina R. Choudhury and M. Safiur Rahman

The study examined the influence of shipbreaking activities on metal contamination in coastal wetland sediments along the Sitakunda coast of the northern Bay of Bengal. The researchers assessed the concentrations, sources, and ecological risks of potentially toxic elements (PTEs) in these environments. Results showed that average metal concentrations followed the order Cr > Ni > Cu > Pb > As > Hg > Cd, with several exceeding established sediment quality thresholds. Among the different wetland types, metal concentrations were highest in mangrove sediments, followed by saltmarsh, mudflat, and sandflat areas. Although the overall Pollution Load Index values were below one, indicating no severe pollution, cadmium (Cd) exhibited a substantial contamination factor. Elevated concentrations of Cd, Cr, and Ni, often exceeding international sediment quality guidelines, were detected, with pollution indices collectively indicating low to moderate contamination largely linked to shipbreaking, steelmaking, and LPG processing activities. Ecological risk assessments revealed that most metals posed low risks, though Hg and Cd presented moderate ecological hazards. Statistical analyses further supported a strong association between metal accumulation and human activities, particularly shipbreaking operations. The authors recommended the establishment of artificial mangrove plantations as a sustainable strategy to trap and stabilise metal pollutants.

Shipbreaking-derived metal contamination in coastal wetlands: Risk and source assessment in northern Bay of Bengal, Bangladesh

OUR REPORTS

NGO Shipbreaking Platform

Ship Recycling in Turkey: Challenges and Future Direction (2024)

"Trading Lives for Profit: How the Shipping Industry Circumvents Regulations to Scrap Toxic Ships on Bangladesh's Beaches" - In collaboration with Human Rights Watch (2023)

Breaking Out: Anchoring Circular Innovation for ship recycling (2022)

The Toxic Tide - Data and figures (2022)

Contradiction in terms: European Union must align its waste ship exports with international law and green deal (2020)

Study Report on Child Labour in the Shipbreaking Sector in Bangladesh (2019)

Behind the Hypocrisy of Better Beaches (2019)

Recycling Outlook. Decommissioning of North Sea Floating Oil & Gas Units. (2019)

NGO SHIPBREAKING PLATFORM

Since 2009, around 8221 ships were scrapped in South Asia, causing at least 476 deaths and 534 injuries. The figures on accidents are likely to be much higher. Occupational diseases are not even registered in these statistics and are not officially monitored.

WE ARE NOW CALLING FOR YOUR SUPPORT TO HELP INJURED WORKERS AND ASBESTOS VICTIMS IN BANGLADESH. CHECK OUT OUR FUNDRAISING CAMPAIGN FOR MORE INFORMATION BY CLICKING HERE OR ON THE IMAGE BELOW.

NGO SHIPBREAKING PLATFORM

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 MAKE A DONATION TO SUPPORT OUR WORK OR CONTACT US TO FIND OUT HOW WE CAN WORK TOGETHER!

SUPPORT OUR WORK

NGO SHIPBREAKING PLATFORM

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