



European Union Network for the Implementation
and Enforcement of Environmental Law

Ship Recycling

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Introduction to IMPEL

The European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL) is an international non-profit association of the environmental authorities of the European Union (EU) Member States, and of other European authorities, namely from acceding and candidate countries of the EU and European Economic Area (EEA). The association is registered in Belgium and its legal seat is in Brussels, Belgium.

IMPEL was set up in 1992 as an informal Network of European regulators and authorities concerned with the implementation and enforcement of environmental law. The Network's objective is to create the necessary impetus in the European Community to make progress on ensuring a more effective application of environmental legislation. The core of the IMPEL activities concerns awareness raising, capacity building and exchange of information and experiences on implementation, enforcement and international enforcement collaboration as well as promoting and supporting the practicability and enforceability of European environmental legislation.

During the previous years IMPEL has developed into a considerable, widely known organisation, being mentioned in a number of EU legislative and policy documents, e.g. the 8th Environment Action Programme that guide European environmental policy until 2030, the EU Action Plan: "Towards a Zero Pollution for Air, Water and Soil" on Flagship 5 and the Recommendation on Minimum Criteria for Environmental Inspections.

The expertise and experience of the participants within IMPEL make the network uniquely qualified to work on both technical and regulatory aspects of EU environmental legislation.

Information on the IMPEL Network is also available through its website at: www.impel.eu



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<p>Project Manager/Authors:</p> <p>Huib van Westen, ILT, Netherlands Alfred Sharples, ERA, Malta Ina Osdal Saure, NEPA, Norway Annika Krutwa, BSH, Germany Ana Rosell, EPA, Sweden Katie Olley, SEPA, UK Hannah Wooldridge, EA, UK</p>	<p>Report adopted at IMPEL General Assembly Meeting:</p> <p>Adopted by written procedure on 20/03/2025</p>
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<p>Executive Summary</p> <p>Almost 90% of the gross tonnage of the ships which are globally being dismantled in the recent year's takes place in Bangladesh, India and Pakistan. Most of the EU/EEA¹ flagged ships are being dismantled in Turkey.</p> <p>This IMPEL project did not focus on the enforcement of illegal shipments itself but on the improvement of collaboration between environmental and maritime authorities involved, preventing illegal shipments, developing guidance material for authorities and other stakeholders involved and capacity building for inspectors and other stakeholders. Cooperation with other institutions, agencies, networks within the EU as with non-governmental bodies is explored as well.</p> <p>Regulation (EC) No 1013/2006² on shipments of waste (WSR) implements at European level the requirements of the Basel Convention. The ship recycling regulation (EU) No 1257/2013 (SRR) brings forward the requirements of the Hong Kong Convention and regulates EU-flagged ships sent for recycling. The SRR requires that EU-flagged ships must be recycled at</p>	

¹ When in this report EU is mentioned, it includes the EEA

² The European Waste Shipment Regulation (EWSR) is revised on 20 May 2024 (see Regulation (EU) 2024/1157). The revised Regulation replaces the 2006 EWSR. However, under transitional law, little will change until 21 May 2026. The 2006 EWSR will continue to apply to shipments notified under Article 4 and for which the competent authority of destination has given an acknowledgement of receipt in accordance with Article 8 before 21 May 2026.



facilities authorised by the respective member state countries, or authorised by the Commission when they are located in third countries. Shipments of waste ships under non-EU -flag shall be subject to the procedure of prior written notification, under the WSR when they are destined for recycling in another EU country or an OECD country. The export to non- OECD countries is prohibited as a result of being hazardous waste.

Ship owners systematically circumvent WSR, and the Regulation is difficult to enforce, due to the practice of renaming, re-flagging and changing of owners before the ships are sent for dismantling and recycling. The SRR is easy to escape as long as the practice of changing to a non-EU flag prior to scrapping continues and as long there are no clear definitions when a ship becomes waste. The cooperation between environmental and maritime agencies is key in preventing future illegalities related to ship recycling. This continuously needs to be improved and expertise and information needs to be shared.

There will be even more challenges ahead when in June 2025 the Hong Kong Convention will enter into force. It is unclear if this will also lead to changes in the above-mentioned EU regulations or for the Basel Convention procedures.

IMPEL has carried out two projects on end-of-life ships and ship recycling between 2019 and 2024. The cooperation between maritime and environmental agencies in several IMPEL member countries has been improved and capacity is built for regulators and the public and private sector as well for civil society. However, it's clear that legislation and in particular the EU SRR need to be improved so that proper implementation as well enforcement can take place in most EU Member States. Circumvention of the legislation, huge differences in how much a shipowner will receive for the steel of his ship when its recycled in the EU or in Turkey/ Asia, and lack of enforcement are the main problems in this sector.

This report describes the activities carried out under this project, the observations gathered and gives recommendations to the European Commission and other stakeholders.

Disclaimer

This report is the result of a project within the IMPEL network. The content does not necessarily represent the view of the national administrations or the Commission.

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1. Project background and objective

Almost 90% of the gross tonnage of the ships which are globally being dismantled in the recent year's takes place in Bangladesh, India and Pakistan. The COVID pandemic learned that complete sectors, for instance the cruise tourism industry, were heavily affected resulting in an early recycling of many ships. In the offshore industry, changes are ongoing due to the energy transition to renewable sources. It is expected that in the coming years many ships, installations, and platforms active in this industry will be dismantled and were reaching the end of their operational lives in any case. It is expected that a large proportion of these ships may not be recycled in the European Union but at facilities in Turkey and elsewhere. For ship recycling, two different EU regulations can be in place.

Regulation (EC) No 1013/2006³ on shipments of waste (WSR) implements at European level the requirements of the Basel Convention and OECD Decision Legal 266. The ship recycling regulation (EU) No 1257/2013 (SRR) brings forward the requirements of the Hong Kong Convention, and regulates EU-flagged ships sent for recycling. The SRR states that EU-flagged ships must be recycled at facilities that are included in the European List of Ship Recycling Facilities. Shipments of waste ships under non-EU-flag shall be subject to the procedure of prior written notification, under the WSR. When they are destined for recycling in another EU country or an OECD country. The export to non- OECD countries is prohibited.

The previous IMPEL project End-of-Life Ships, which ran from 2019-2021, learned that for both regulations in almost all Member States different authorities, environmental and maritime, are involved.

This IMPEL project did not focus on the enforcement of illegal shipments itself but on the improvement of collaboration between environmental and maritime authorities involved, preventing illegal shipments, developing guidance material for authorities and other stakeholders involved and capacity building for inspectors and other stakeholders. Cooperation with other institutions, agencies, networks within the EU as with non-governmental bodies was explored as well.

Ship owners systematically circumvent WSR, and the regulation is difficult to enforce, due to the practice of rename, reflagging and change of owners before the ships are sent for dismantling and

³ The European Waste Shipment Regulation (EWSR) is revised on 20 May 2024 (see Regulation (EU) 2024/1157).



recycling. The SRR is easy to escape as long as the practice of change to a non-EU flag continues and as long there are no clear definitions when a ship becomes waste.

The cooperation between environmental and maritime agencies is key in preventing future illegalities related to ship recycling. This continuously needs to be improved and expertise and information needs to be shared.

1.1. Desired outcomes and outputs

1.1.1. Desired outcomes

The best way to prevent illegal ship recycling is to act at forehand by following up ships and ship owners where circumvention of the regulations is suspected, and preferably actions can be taken before the illegal activities or circumvention takes place. Education to involved actors can be part of this.

To make it easier for case handlers and inspectors to identify illegality it will be important to:

- Clarify the differences between Waste Shipment Regulation and Ship Recycling Regulation
- Improve the cooperation between the environmental and maritime agencies at the national and international level.
- Improvement of collaboration between national authorities and IMPEL with European Institutions like EMSA, other Networks and NGO's
- Share practical knowledge (court cases, documents, reports, experiences)
- Develop guidance/leaflets for inspectors and other stakeholders for a better understanding of the WSR and SRR and how to detect and reduce illegal shipment of ships.
- Use basecamp as a knowledge sharing platform and knowledge exchange, and gather best practises.
- The final report gives the state of actual situation on enforcement and compliance practices on WSR vs SRR.

1.1.2. Desired outputs

According to the Terms of References (ToR) of the project the following outputs were desired.

- The project will host three webinars where best practise and problematic issues will be discussed. The webinars will be available for all IMPEL-members and invitations will be sent through the IMPEL-network.



- The project will develop at least three guidance documents in cooperation with other institutions (e.g. EMSA).
- The project will explore the possibilities to create a predictive model for MS flagged or MS owned vessels based on Artificial Intelligence to prevent illegal ship dismantling.
- Three workshops which include at least two site visits to European Ship Recycling approved facilities. During the workshops other Networks like ENPE and EUFJE will be invited as well as other institutions, the DG ENV and NGO's. Cooperation with other instruments like TAIEX will be used when applicable.
- Supporting activities to improve the knowledge of other stakeholders like, ship owners, Class/surveyors, public prosecutors (ENPE), Judges (EUFJE), including representing the IMPEL project during the ENV SHIP RECYCLING Meetings in Brussels.
- Participate in and supporting other networks to improve the awareness and knowledge on the topic of ship recycling.
- Social media will be used (LinkedIn, tweets, Facebook etc.) to promote the topic and the role of IMPEL to this topic.
- To create insight in reporting challenges by MS via national databases vs Thetis-EU
- Study visits to exchange knowledge and best practices, supported by TAIEX.
- Explore the development of a predictive model for MS flagged/ owned vessels based on Artificial Intelligence (AI).
- The final report will include the state of actual situation, guidance on enforcement practices on ship recycling, best practices, and recommendations.



2. Activities in 2022

2.1 Project start

The participants for this project expressed their interest via a Manifestation of Interest (MOI). This process was followed for the first time in IMPEL for the project cycle 2022-2024. It turned out that participants which expressed their interest before were not on the MOI list provided via the National Coordinators. It cost extra work to have a complete list with interested and active participants.

In total there were 47 interested participants from 15 different countries and representing 19 different organizations. The organizations included as well environmental as maritime agencies. Basecamp will be used as project platform where all relevant information was shared. Messages in basecamp were sent to 178 followers of the project and includes the IMPEL National Coordinators and the IMPEL Secretariat.

2.2 Kick off

An online kick off meeting was held in May 2022 where a core team for the project was established. Most of the core team members participated also in the end-of-life ships project. Core team members represented environmental and maritime agencies from 6 different countries. There was an agreement on the planned activities as well to skip and replace some outputs based on the finalized report of the end-of-life ships project

2.3 Study visit to Norway

In September 2022 a study visit with 6 Pproject core group members to Norway took place. In Oslo a meeting was held at the premises of the Norwegian Environment Agency. Information about the cooperation between different authorities and dealing with ship related business such as the maritime agency, coast guard, environment agency and others were presented. The specialized unit of the Norwegian Police 'Økokrim' presented a successful case study, and the private sector gave insight in their work when monitoring a ship during the recycling in Turkey. Some of the conclusions and recommendations were shared by the private sector such as: most of the safety incidents are related to lifting operations and there is no reference to e.g. the existing EU standards for lifting. The monitoring of environmental pollution in certain areas is lacking in the SRR. A call was made to have equal rules for EU and non-EU flagged vessels no matter where they are sailing. An EU approved and listed Ship Recycling facility was visited in Bergen as well a meeting with the local environmental authorities which are permitting and supervising this company.



2.4 Workshop in the Netherlands

In October 2022, a workshop was held in the Netherlands in the office of the Human Environment and Transport Inspectorate (ILT). There were 25 participants in the meeting representing the European Union, the International Ship Recycling Association (ISRA), NGO Shipbreaking Platform and maritime and environment agencies from Norway, Malta, Sweden, France, UK, Portugal, Turkey, and Netherlands as well police from Norway and the Netherlands. Updates, experiences, and best practices were shared including the call from the EU to participate in the evaluation of the SRR. It was also mentioned that it was important to get more involvement of maritime agencies in the project activities.

During a roundtable the following topics were brought to the table:

- lacking of clear definitions in the SRR when a ship becomes waste;
- there is no classification for end-of-life ships in the EU Waste list;
- there is no code in the Basel Convention, the OECD Decision or the WSR for end-of-life ships containing hazardous substances;
- there are challenges for flag States to supervise that ships under their jurisdiction, but not present in their country, are considered or intended to be recycled.
- there is lacking a definition in the SRR who is actually seen as the owner of a ship (beneficial/ registered/ etc.)

There was also a visit to a facility which is on the EU list and where mainly offshore installations and platforms are being recycled. The various aspects on safety, downstream waste management, substances of serious concern were discussed and showed.

2.5 Webinar

End of November 2022, a webinar was organized by the project team and 17 persons participated. There were interactive discussions on some of the suggested ideas as the use of a material passport, to make the beneficial owner responsible, conditions for re-flagging and others.

2.6 Networking

In March, the topic of illegal ship recycling as the IMPEL project was introduced to the Interpol Pollution Crime Working Group at a meeting in the Interpol Headquarter in Lyon, France. Experiences of how to tackle this type of crime and the related challenges were presented to this group and online participants from various continents. The money driven activities and the harm to the environment and human health as well the poor conditions many workers in this sector are facing were recognized. Unlawful ship recycling is one of the



new offence categories which are mentioned in the proposal for the new EU Environmental Crime Directive⁴.

3. Activities in 2023

3.1 Workshop Cyprus

In April 2023, a workshop was held in Larnaca, Cyprus. In total 37 person were participating in this meeting. Besides representatives from the maritime and environmental agencies, there were participants representing the European Commission, Frontex, OLAF, as well local maritime related organizations such as the Cyprus Shipping Chamber and the Cyprus Marine & Maritime Institute. Police officers from 4 different countries were present as well an NGO.

The position of Cyprus regarding the Hong Kong Convention (HKC) and the SRR were shared. The HKC was not ratified by Cyprus at that time, the reason being related to the conditions which needed to be fulfilled before enough countries representing a certain percentage of the global fleet had ratified the HKC. This is in relation to the countries which could offer enough recycling capacity for again representing a certain percentage of the global ship recycling capacity. It was explained that Cyprus was supportive to the HKC but wished to let it enter into force without ratification y before the minimum of the set conditions were met. It was also mentioned that ship owners need to give a written statement if a ship is going to be recycled or not when it's deleted from the flag register.

Presentations by the European Commission as well discussions and break-out session were held concerning the evaluation and recommendations of the SRR. One returning issue is that there are no clear definitions in the SRR who the owner of a ship is and when exactly a ship becomes waste. No reference is made to for instance the definitions of 'holder', 'notifier' and 'disposer' as defined in respectively the EU WSR and the Basel Convention. In both of those the definition when an object becomes waste is clearly defined. In the SRR, it's not defined at which moment a ship becomes waste. It would be logical that this will be brought in line with the Basel Convention and the EU WSR.

A presentation of a predictive model related to potential end of life vessels was presented by the Dutch Human Environment and Transport Inspectorate (ILT). Case studies, outcomes of criminal

⁴ The [new Environmental Crime Directive](#) was adopted on 11 April 2024 and entered into force on 20 May 2024, supporting the protection of the environment through criminal law and replacing the [2008 Environmental Crime Directive](#)



investigations and suggestions for developing tools related to information and documentation which are helpful to conclude if a ship is waste or what the real destination of a ship is.

3.2 Study visit to Turkey

Many of the ships flying the flag of an EU Member State are being recycled at recycling facilities in Aliaga, Turkey. More than 20 facilities are located in that area and half of them are on the EU list belonging to the SRR. In Aliaga are also ships recycled which do not fly the flag of an EU Member State. The rules of the Basel Convention, or when coming from the EU the EU WSR applies.

Unfortunately, it was due to circumstances, including changes in the government due to the elections in May 2023, not possible to organise this visit.

3.3 Webinar

The webinar which was supposed to be planned for 2023 was postponed to January 2024.

3.4 Networking

The project was presented during the IMPEL open day, an online event where the work of IMPEL is being presented to potential new IMPEL members and other interested participants.

The topic of ship recycling or end of life ships and their (illegal) dismantling was presented during an event hosted by OLAF in Brussels. The event was organised under the EMPACT initiative. The EU policy cycle EMPACT (European Multidisciplinary Platform Against Criminal Threats) is a security initiative driven by EU Member States to identify, prioritise and address threats posed by organised and serious international crime. EMPACT brings together a broad range of multidisciplinary professionals from Member States and third countries to take concrete actions against criminal networks. Participants include law enforcement authorities, the judiciary, EU agencies, customs and tax offices and private partners. With EMPACT, every year over 200 operational actions are carried out in targeted key crime areas⁵.

ENPE and the University of La Rochelle organised the conference: "The Sea: The World's Largest Crimes scene - the case of environmental crime' in La Rochelle, France in April 2023. IMPEL shared

⁵ <https://www.eurojust.europa.eu/empact>



their expertise on the topic and the work IMPEL is doing for a better implementation, prevention and enforcement of the European laws related to this topic⁶.

Seatrade reaches settlement with Dutch Public Prosecution Service

Dutch ship owner Seatrade has reached a settlement with the Dutch Public Prosecution Service following the illegal export of four ships to India, Bangladesh, and Turkey for scrapping back in 2012. The agreement entails the payment of a total sum of 5,650,000 euros. Preventing further prosecution, fines totalling 2,650,000 euros were imposed on the shipping company and two of its directors, with an additional settlement of 3,000,000 euros.

On 15 March 2018, the District Court of Rotterdam found Seatrade and two of its directors guilty of violating the European Waste Shipment Regulation. However, this initial ruling was annulled by the Court of Appeal in The Hague on 30 June 2020, due to procedural irregularities, and a new trial was set to begin.

Source: [Press Release - Seatrade reaches settlement with Dutch Public Prosecution Service](#)

4. Activities in 2024

4.1 Webinars

The first webinar in this year was held on 18 January with the focus on the authorization process of the ship recycling facilities in Member States and which are on the EU list belonging to the EU SRR.

Norway and the Netherlands presented how this process was organised in these countries. In both countries the Environmental Permit for the facility itself is usually issued at the local or regional level. The approval to be on the EU list, according to article 13 of the EU SRR is in both countries given by national authorities, respectively the Norwegian Environment Agency (NEA) and the Dutch Human Environment and Transport Inspectorate (ILT). Supervision of the facilities and enforcement is in both countries a competence of the regional and national authority. Ship

⁶ <https://www.univ-larochelle.fr/luniversite/espace-presse/communiqués-de-presse/2023-2/la-mer-la-plus-grande-scène-de-crimes-au-monde-le-cas-de-la-criminalité-environnementale/>



Recycling Plans for ships which are being recycled at the EU listed facilities in Norway and the Netherlands are approved by the National authorities, NEA and ILT.

The second webinar in 2024 held on 30 October was focused on discussing the challenges which might occur when the Hong Kong Convention enters into force in June 2025. It was discussed how the Member States are dealing with the required certificates from both legal frameworks (SRR and HKC), challenges on HKC approved facilities which are not on the EU list and the changes in the EU Waste Shipment Regulation and the EU SRR since May 2024. For example, the opportunity for EU flagged ships which become waste outside the EU and are recycled at EU listed facilities in non-OECD countries. At the end of 2024 there are no such facilities on the EU list, but this can be the case in the future. This means that hazardous waste owned and discarded by EU based companies could be sent to non-OECD countries. Hopefully early 2025 the Commission will come with more information how to deal with such issues.

Both the webinars were organised by the colleagues from Malta and had around 20 participants from 12 countries.

4.2 Study visit to Denmark

In April (16-18) a study visit to Denmark took place, with 8 participants from six countries. At the first day the project team discussed the planned activities for 2024 and possible effects on the SRR when the HKC will enter into force in 2025. The proposal of MEPC81-15⁷ concerning better coordination between the Basel and the Hong Kong Conventions was discussed. Project members agreed that the highest level of protection to the Environment and Human Health should be followed which seems to be the procedures of the Basel Convention. Some project members have concerns if this highest level of protection still could be achieved when ships are going to be excluded from the Basel Convention. It's believed that decisions of scrapping a vessel costs time and is a process of weeks, months or even longer.

Some project members point out the problem to classify a ship as waste after the Ready for Recycling Certificate (RfRC) is issued as there is no obligation under the SRR to deliver the ship to the recycling yard once having received the RfRC. There is always the possibility that the shipowner decides to keep the ship in service. This is not in line with other clear waste definitions

⁷ A proposal regarding the overlap of the Basel Convention and Hong Kong Convention discussed during the Marine Environment Protection Committee 81st session (MEPC 81), 18-22 March 2024 <https://www.imo.org/en/MediaCentre/MeetingSummaries/Pages/MEPC-81.aspx>



in EU law and jurisprudence on when the intent of a waste shipment starts. Furthermore, it will have a huge negative impact at the enforceability of the SRR/ HKC. The relevant articles related to ships in the revised WSR were discussed as well. The issue of how to deal with NORM from outside the EU (such as the UK) and its return was discussed as well.

The guidance for various stakeholders was finalised with a big thanks to the colleagues of German BSH and Scottish SEPA!

The Danish EPA gave an overview which authorities and their role are involved in ship recycling. The Ministry of Environment has the overall responsibility, the municipalities are the competent authority for the ship recycling facilities including decisions on the admission to the EU list. In Denmark there are 5 ship recycling facilities on the EU list. The Danish EPA has, besides others, the task for the enforcement of the WSR and the SRR. The Danish Maritime authorities are competent for port inspections including IHM and other certificates. Several case studies were presented as well.

In the afternoon a site visit to one of the EU listed ship recycling facilities, Smedegaarden, took place. The recycling of ships takes place in three steps. Alongside, the ship is being made safe, accessible, and ready for dismantling. The 2nd step, still alongside, is removal of accommodation, etc. and the 3rd step is that the ship will be on land via a slipway where the ship is being cut in pieces. The company is also trading in removed 2nd hand spare parts.

On the 17th of April a meeting with representatives of the Frederikshavn Municipality took place. Frederikshavn has two EU listed ship recycling facilities, and the municipality is responsible for permitting and enforcement of the activities at the facilities including the process of the admission to be on the EU list. One of the facilities is the largest ship recycling facility in the EU and completely new built. This facility can have large ships with a length of 400 meters, 90 width and a draught of 14 meters. The other facility is smaller. Challenges regarding the SRR and WSR were discussed such as the limited time for approval of the Ship Recycling Plan and completing the recycling of ships under WSR within one year after arrival.

On the 18th Modern American Recycling Services (M.A.R.S.), the largest ship recycling facility in the EU was visited. The facility was new built and operational since 2020. The size of the yard is 67,200 m² and divided in several parts. The process is equal to other yards, namely load in/ load out alongside and first removals after the inventory and safety clearance process. The next steps are using the ramp to pull the ships or installations on land for further demolition. A huge area of the facility is used for cutting, sorting, and storing the various metals. The facility has its own wastewater treatment facility. They are recycling large FPSO, FPU, Platforms and other offshore installations and ships. Interestingly, shipowners have to pay for the disposal of their toxic ships, especially those containing NORM as the cost of recycling is extremely high in these cases.



4.3 Capacity building event Bilbao

In October (22-24) a capacity building workshop was organised, hosted by Spanish Guardia Civil and held in their premises in Bilbao. The 36 participants came from 18 different countries and included Coast Guard, maritime agencies, Port State Control Inspectors, Environmental Inspectors, police, public prosecutors, EUROPOL, EU listed ship recycling facilities and an NGO. The respective EU legislation, Ship Recycling Regulation and the revised Waste Shipment Regulation were introduced. Case Studies and available tools were shared and interactive break-out sessions and group work held.

The variety of organizations where the participants working for led to positive discussions, understandings and improvement of cooperation in the near future. The workshop also showed that capacity building on this topic for the involved stakeholders from public, private and civil organizations is very valuable and highly needed.

Fined for illegal export of two vessels to India

A ship management company based in Stavanger, Norway, has been fined NOK 8 million (approx. EUR 700,000) for the illegal export of two vessels to India.

Both ships had operated as shuttle tankers in the North Sea for almost two decades. For commercial reasons, there is a maximum operation period of 20 years for vessels in the North Sea. Both tankers were beached and scrapped in Alang, India. The shipbreaking method commonly known as beaching involves the vessel being run ashore ('beached') and dismantled in the intertidal zone. Such scrapping of obsolete ships is a major global environmental problem.

Shipbreaking on Asian beaches has a huge environmental impact on, inter alia, local ecosystems, polluting them with heavy metals and other hazardous substances. The safety of the treatment of hazardous waste is doubtful, and the scrapping is associated with a high risk of work accidents.

The Norwegian National Authority for Investigation and Prosecution of Economic and Environmental Crime (Økokrim) takes a serious view of export of Norwegian-operated obsolete ships and their associated waste and environmental problems to developing countries with weaker legislation and law enforcement than Norway, says Økokrim's police prosecutor Maria Bache Dahl.

Source: <https://www.okokrim.no/fined-for-illegal-export-of-two-vessels-to-india.6668022-549344.html>



4.4 Workshop Malta

The Maltese Environment Resources Authority (ERA) hosted the last workshop under this project in St Pauls Bay, Malta. The meeting was held from 12-14 November and 39 participants attended. Participants representing maritime agencies, police, ministry of Transport, environmental agencies and civil society. The European Commission and the European Recycling Industry represented their work on this working area. According to the Commission the results of the evaluation of the SRR can be expected early 2025.

Besides various case studies presented by Malta, Netherlands and NGO Ship Breaking Platform various sessions were focused on the challenges and changes due to the revised EU WSR and the entry into force of the HKC. It remains to be seen how the EU and the Member States will take a position on HKC in the IMO and Basel bodies in the future. The Convention of Parties to the Basel Convention will discuss in May 2025 the provisional guidance (HKSRC.2/Circ.1) drafted by IMO when it comes to obligations of the Basel Convention versus the Hong Kong Convention, for instance related to the Prior Informed Consent (PIC) procedure and the Basel Ban which prohibit export of hazardous waste from OECD to non- OECD countries.

4.5 Meeting with Turkish authorities

In cooperation with NGO Shipbreaking Platform a meeting with the involved Turkish authorities was organised in Ankara on 10 December. The 34 participants represented the European Commission, the Turkish Ministries of Labour, Environment, Transport as well the regional authorities from Izmir which are responsible for the Aliaga area where all ship recycling facilities are located. There were also civil society representatives, academics, DNV which are inspecting the non-EU located facilities on behalf of the Commission and IMPEL representatives from Norway and the Netherlands.

One of the main reasons to organise this workshop was that the contracts between the landowners and the recycling facilities are ending in 2026. This gives the opportunity to see of improvements regarding for instance permits and conditions are needed and eventually can be set in the future.

The respective Turkish authorities presented their work and responsibility in regard to the ship recycling in the Aliaga area in Turkey. The Commission and DNV presented their work and results of the inspection of various facilities in Aliaga and the IMPEL representatives explained the permits and conditions which needs to be met before a recycling facility in Norway and Netherlands is able and allowed to operate.



The workshop revealed that the ship recycling sector is exempt from the EIA Regulation and the Environmental Permit and License Regulation, which require ship recycling facilities to obtain an Environmental Permit. Since 2016, the licensing process for these facilities has been on hold pending the establishment of a separate instrument to define specific procedures for ship recycling.

Inspections conducted by the Commission indicated that several facilities require improvements. They also highlighted the need for more robust inspections focused on driving these improvements. Additionally, it is necessary to explore the procedures and actions required to ensure compliance by the facilities.

The Turkish Ministry of Environment and Urbanization provides ship dismantling permits to the facilities for renewal every year. During the workshop, it was shared that necessary efforts are being made to improve the physical conditions of the facilities and to improve compliance with the legislation. It is planned to publish the Procedures and Principles of Ship Recycling Facilities. Also, it was shared that the Ministry will conduct a Regional Environmental Impact Assessment for the facilities in Aliğa Region and the related process is ongoing. Yet, no specific date or decision to conduct the EIA was shared.

5. Developed tools

5.1 End-of-life ships – Guidance for relevant stakeholders on the EU’s Ship Recycling Regulation and Waste Shipment Regulation

Under the project, tools have been developed for stakeholders dealing with this topic. Due to the relatively new and complex legislation it is obvious that officers working for the involved agencies as well ship owners and recycling facilities, amongst others need guidance to distinguish which laws are in place, which procedures need to be followed and which responsibilities the various stakeholders have.

The aim of this guidance is to assist the relevant stakeholders in the application of the two EU Regulations – EU SRR and EU WSR – in relation to ship recycling, to set out the resulting responsibilities of each and to clarify processes.

The guidance is attached under Annex 1 of this report.



5.2 A guide for officers: what documentation to ask for when dealing with end-of-life vessels

This guide sets out the types of documents that can be required/ request to be furnished in order to assist an authority in its compliance monitoring or investigations concerning end-of-life ships. Please note that the documentation that can be requested must be assessed against the individual authority's mandate and legal basis. It details what information can be garnered from the document and from whom it can be requested. The documents mentioned in the guidance is based on the experience of the Dutch Seaport Police during their criminal investigations. The documents could be used to assess whether a vessel has been 'discarded'/ is waste and what the holder, previous owner or buyer's intention with it was. They may also show details of the planned scrapping route. Some of the documents listed in this guidance may assist with establishing the particulars of the vessel (and the case) and whether it contains/ constitutes hazardous waste. They can be used at different stages of the inspection or investigation.

The guidance document is available for officials only and on request and will not be published on the internet.

5.3 Other

During the project the development of a predictive tool by the Dutch ILT and used by this organisation was followed and presented during several workshops. This tool works with Artificial Intelligence and Machine Learning and could be used as input to select ships or shipowners for inspection to see if a particular ship is destined for recycling on a short term. The tool has included also the risk that these ships potentially will be beached in South Asia.

6. Observations

On various topics and related to various stakeholder observations are made by the project members during the time of the project, 1 January 2022 until 31 December 2024. These observations are made during the workshops, study visits, other meetings and based on experiences by project members during their regular tasks. The main observations are listed in the following paragraphs.



6.1 Legislative framework

- In relation to ship recycling and end of life ships two different legislations can be in place, the EU WSR and the EU SRR. Which of these is in place depends on the flag, tonnage, destination, etc.
- In most IMPEL countries different authorities are responsible for the SRR and the WSR. Environmental authorities for the WSR and the obligations for the recycling including the facilities. Maritime authorities for the EU SRR when it comes to the various certificates related for instance to the registration, hazardous materials, etc.
- Cooperation between those authorities is mostly not in place or not formalised. In a few countries there are regular cooperation.
- The EU WSR have clearer definitions for when substances and objects becomes waste and whom are the responsible persons and what should be considered as an illegal shipment. These are based on the Basel Convention and the EU Waste Framework Directive (WFD). There is also jurisprudence available which helps how to interpret this.
- The EU SRR is lacking a clear definition when a ship becomes waste.
- There are differences of the timeframes determined by the relevant administrations in MSs when ship owners need to notify in writing to that relevant administration, of the intention to recycle the ship in a specified ship recycling facility or facilities. In some MSs no timeframes are determined.
- In the EU SRR there is no minimum time mentioned between the time a Ready for Recycling Certificate is issued and the actual recycling of the ship.
- In May 2024 the EU WSR and the EU SRR were revised regarding which ships are under the scope of the EU WSR in case they are being exported from the Union to non- OECD countries.
- The Hong Kong Convention will enter into force in June 2025. By end of December 2024 it remains to be seen how the EU and the Member States will take a position on HKC in the IMO and Basel bodies in the future
- Due to Brexit the UK have their UK SRR and UK WSR. This means that UK flagged ships are no longer excluded from the EU WSR when considered waste and visiting or leaving EU MSs ports and waters.
- Ships which are EU flagged, become waste outside the EU and destined for recycling in an EU listed facility located outside the Union, are not excluded from the Basel Convention in case parties to this Convention are involved in the transboundary movement to the recycling facility.
- In the EU SRR it is not clearly stated that a ship recycling facility which is not included in the EU list is not allowed to recycle ships which are falling under the scope of the EU SRR.



- By End of December 2024, it is also still unclear what the outcomes of the evaluation of the EU SRR will be and if this will lead to a revision of the EU SRR.

6.2 Competences and cooperation

- In most IMPEL member countries the competent authority of the WSR is an environmental authority and the administration according to the SRR is a maritime authority. Competent authorities for the ship recycling facilities in the IMPEL member countries are environmental authorities.
- In some IMPEL member countries there is regular cooperation between these authorities and includes also coast guard and others. In some, there is cooperation on a case-by-case approach, but in most member countries there is no regular or no cooperation.
- Ship recycling facilities in several IMPEL member countries are under the competences of the local or regional authorities.
- Investigations are carried out solely by the police in some IMPEL member countries. In most of the member countries investigations are carried out by the responsible agencies (environment and maritime) themselves or in cooperation with the police.
- Environmental agencies are lacking knowledge of the maritime laws related to ship recycling and vice versa maritime agencies are lacking knowledge on the environmental laws on this topic.
- Since May 2024 the EU Environmental Crime Directive is revised and a category related to unlawful ship recycling is added. The Member States must implement this criminal offense in national law.

6.3 Supervision, enforcement, and prosecution

- Supervision and enforcement are divided due to the different laws which are supervised by different organizations such as maritime agencies, environmental agencies, coast guard, port state control, police, and others.
- There is lack of capacity at almost every actor or stakeholder involved due to the different legislation which is also experienced as complex. This includes public and private actors and other stakeholders.
- There is lack of awareness in various IMPEL member countries or organizations involved in supervision, enforcement and prosecution.
- In just a few IMPEL member countries successful supervision, enforcement and prosecution have taken place. In most of the cases this were violations of the EU WSR.



- Ships are not being rejected or sent back when they arrive illegally at the recycling facilities in the destination countries without having followed a Basel PIC procedure or an EU WSR notification procedure.
- Due to given special conditions, ship recycling facilities in Turkey are exempted from some of the requirements such as preparing an Environmental Impact Assessment⁸.
- In several cases of illegal movements of ships settlements, were agreed before the cases went to court or before there was a final verdict.
- Involved natural persons, such as Directors from Ship owners, have also been held responsible and suspended prison sentences have been imposed in addition to fines.
- In some cases, the unlawfully obtained benefit has also been recovered.
- The European Commission has no other options to sanction the EU listed facilities outside the EU in case of infringements besides suspension or removal from the list. Facilities in the EU are being sanctioned by the responsible authorities in that country.
- It is very difficult to investigate and prosecute ship owners which are registered or have registered their ships in so called 'flag of convenience' States which are always outside the EU.
- Measures such as statements that a ship is not destined for ship recycling when it's deleted from an EU flag State register are not sufficient to prevent illegal shipbreaking and easy to circumvent.
- Ships including the recycling 'problem' are often sold a few years before the ship needs or is going to be recycled.
- EU owned, not EU flagged, ships are still ending up illegally at beaches in South Asia.
- Figures from civil society and private sector shows that there are ships which have been send illegally from the EU to facilities outside the EU. In many cases there was no follow-up on this. No actions have been taken to EU countries who don't carry out any enforcement activity on this topic.
- In case an EU flagged ship is 'suspected' to become waste in another EU MS than the flag state it's not clear in the EU SRR what the role of the MS where the ship lies is. Furthermore, it's not clear how the flag State administration can supervise this.

⁸ INSPECTION OF A SHIP RECYCLING FACILITY IN TURKEY, Site inspection report –Application 38, European Commission DG Environment



7. Recommendations

- Set clear definitions in the EU SRR when a ship becomes waste and bring this in line with definitions of waste as in the EU Waste Framework Directive, the EU WSR and the Basel Convention.
- Revise the SRR by setting minimum timeframes for how much time in advance of the recycling a Ready for Recycling Certificate should be issued and a minimum time frame to inform the administration in writing of the intend to recycle a ship.
- The EU Commission should be given more options for sanctions such as penalties when EU listed facilities outside the EU are not in compliance.
- Facilities which are on the EU list and located outside the EU should be supervised and monitored by local authorities on the compliance of the obligations in the SRR. The EU Commission should monitor this process and be able to take action if needed.
- EU-listed facilities located outside the EU should have an environmental permit or carried out an environmental impact assessment which are in line with the obligations laid down in the EU SRR and other EU law.
- Obligations to be a certified facility under the Hong Kong Convention should be brought in line with the obligations set in the EU SRR for facilities outside the EU.
- In a revised EU SRR competences for supervision and enforcement should be given to authorities in another EU MS where a ship is located and being suspected to become waste but is flying the flag of another EU MS.
- Explore to possibility to give responsibility for sustainable ship recycling at an EU listed facility to a minimum of 3-5 years to a previous owner of an EU flagged shipped when this ship is being sold after a certain age of the ship.
- To bring clarity who is the owner of a ship when the owner is registered in a particular country with a PO Box as address while the decisions to recycle the ship are being made in EU or OECD countries.
- Capacity building is needed for all actors involved in the enforcement chain as well to the stakeholders in the private sector including ship owners and ship recyclers.
- Create a network under IMO or the EU of practitioners from both the environmental as the maritime community to discuss challenges, best practices and to build capacity.



8. Conclusions

The legislative framework related to ship recycling and more precise to ships which are going to be or have been recycled is complex. Depending sometimes just on a flag a ship is flying, it can be under different laws and on top of this other, in most cases not related, authorities are competent to regulate and enforce these laws. In the maritime community flag changes are taken place regularly but this cannot be seen as a kind of excuse for circumvention of the Regulations.

All this brings many challenges when it comes to implementation and enforcement of the respective European Laws related to this topic. There will be even more challenges ahead when in June 2025 the Hong Kong Convention will enter into force. It is unclear if this will also lead to changes in the above-mentioned EU Regulations or for the Basel Convention procedures.

IMPEL has carried out two projects on end-of-life ships and ship recycling between 2019 and 2024. The cooperation between maritime and environmental agencies in several IMPEL member countries has been improved and capacity is built for regulators and the public and private sector as well for civil society. However, it's clear that legislation and in particular the EU SRR need to be improved so that proper implementation as well enforcement can take place in most EU MS. Circumvention of the legislation, huge differences in how much a shipowner will receive for the steel of his ship when its recycled in the EU or in Turkey/ Asia, and lack of enforcement are the main problems in this sector.

Many thanks for the efforts, cooperation, contributions to all involved project members and in particular to the core project team, interested partners, the European Commission and colleagues from maritime and environmental authorities, international organizations, private sector, police and prosecutors and the NGO Ship Breaking Platform. Without this cooperation and inputs the project would not have been successful as it was.



Annexes

Annex I. Guidance for relevant stakeholders



European Union Network for the
Implementation and Enforcement
of Environmental Law

**End-of-life ships – Guidance for relevant
stakeholders on the EU’s Ship Recycling
Regulation and Waste Shipment Regulation**

April 2023

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Disclaimer

This report is the result of a project within the IMPEL network. The content does not necessarily represent the view of the national administrations.

List of abbreviations

COM . .	Commission
EEA . . .	European Economic Area
EU	European Union
GT	Gross Tonnage
HKC . . .	The Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships
IC	Inventory Certificate
IHM . . .	Inventory of Hazardous Materials
MS	Member State
PSC . . .	Port State Control
RfRC . .	Ready for Recycling Certificate
RO	Recognised Organisations
SoC . . .	Statement of Compliance
SRR . . .	Ship Recycling Regulation; Regulation (EU) No 1257/2013
WSR . . .	Waste Shipment Regulation; Regulation (EC) No 1013/2006

1 Background

The scrapping of hundreds of end-of-life seagoing ships per year worldwide is mostly done in recycling facilities in South Asia under varying, partly low or doubtful environmental, occupational health and safety standards. More than 70 % of the gross tonnage dismantled globally in the recent years has taken place in Bangladesh, India and Pakistan. Despite existing EU regulations, such as, Regulation (EU) No 1257/2013 ([Ship Recycling Regulation, EU SRR](#)) and the Regulation (EC) No 1013/2006 on shipments of waste ([Waste Shipment Regulation, EU WSR](#)), and international conventions such as the Basel Convention, and the not yet in force Hong Kong Convention (HKC)

a large proportion of formerly EU-flagged ships continue to be scrapped in Asia.

The EU SRR implements the requirements of the Hong Kong Convention for the safe and environmentally sound recycling of ships into EU law, but also contains additional safety and environmental requirements.

The aim of this guidance is to assist the relevant stakeholders in the application of the two EU Regulations – EU SRR and EU WSR – in relation to ship recycling, to set out the resulting responsibilities of each and to clarify processes.

2 Ship Recycling Regulation or Waste Shipment Regulation: Which requirements must be met?

The EU SRR has been applicable in the EU since 31.12.2018, it applies – with the exception of Art. 12 (Requirements of a ship flying the flag of a third country) – to all ships flying the flag of an EU Member/EEA State. However, there are the following exceptions from the application of the EU SRR (Art 2(2)):

- warships, naval auxiliaries or other ships owned or operated by a State and used for the time being only for non-commercial governmental services;
- Ships of less than 500 gross tonnage (GT);
- Ships which throughout their life cycle are operated only in waters under the sovereignty or jurisdiction of the Member State whose flag they fly.

All cases of ship recycling that are not covered by the scope of the EU SRR fall under the scope of the EU WSR with the following exceptions:

- The ship is not located in territorial waters of a Member State (MS) when the decision of recycling is taken. In these cases, the national or other international legislation will apply.
- The ship is destined to be recycled in the country where the ship is located at the time of the decision. Then national legislation applies and the ship must be recycled at a licensed recycling facility in the relevant country.

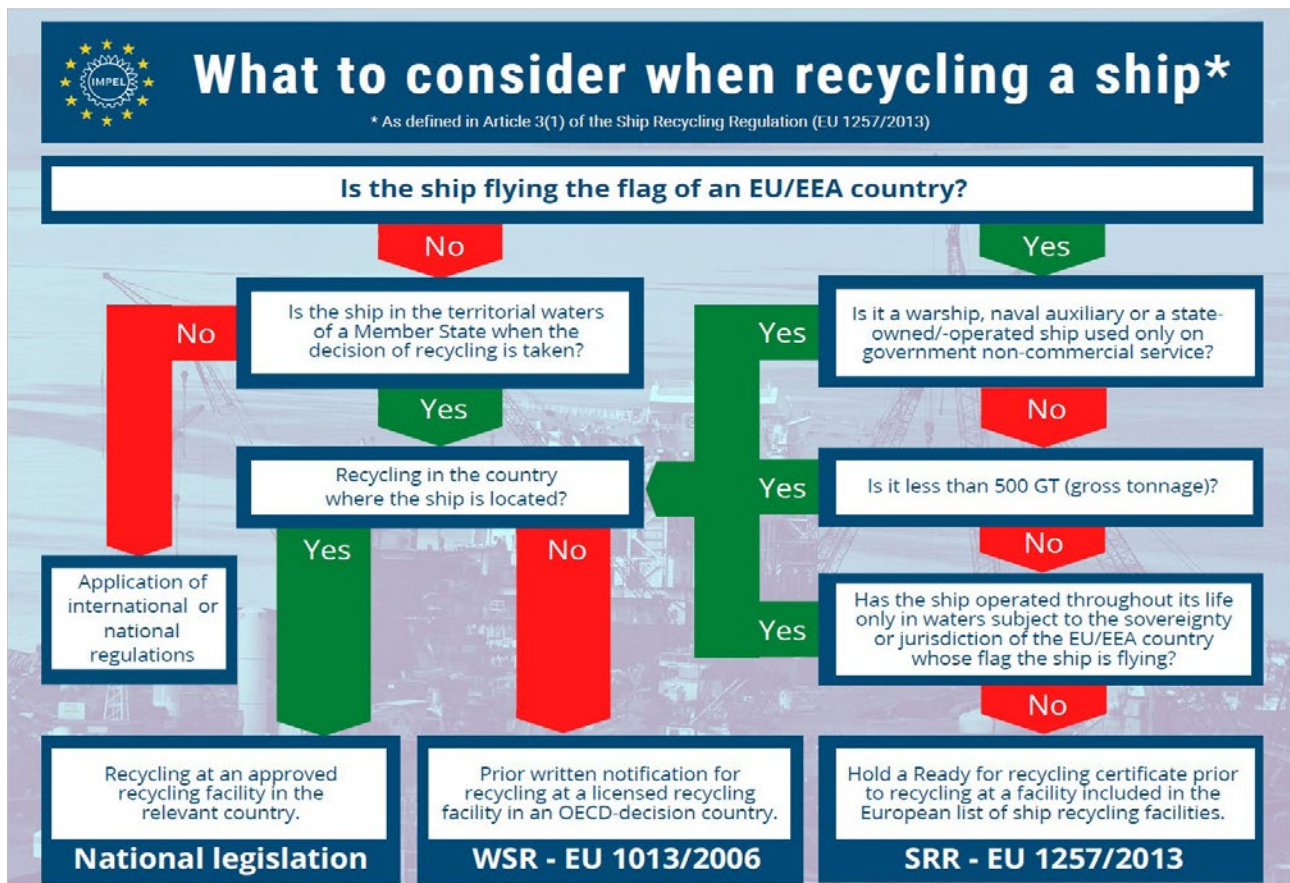


Figure 1: Overview of what to consider when recycling a ship as defined in Art. 3(1) of the EU SRR.

3 Ship Recycling Regulation

3.1 Relevant stakeholders and processes

Under the SRR, different stakeholders have various responsibilities. These are:

- the shipowner,
- the EU Flag State administration,
- the EU Port State administration,
- the operator of the recycling facility; and
- the competent authority of the state where the recycling facility is located.

Different processes can be distinguished under the SRR, in which the various stakeholders are involved in different ways and different certificates are required. To simplify matters, this guidance classifies five processes:

- (A) Ship operating in international trade,
- (B) Decision of recycling is made,
- (C) Two options of procedures depending on the type of approval of the ship recycling plan,
- (D) Preparation for recycling and finally
- (E) Ship arrival at an EU listed ship recycling facility.

The obligations each stakeholder must fulfil individually in the related process are outlined below.

3.1.1 Shipowner (with ships flying the flag of EU/EAA country)

- (A) Ship operating in international trade
 - *Prepare* and *update* an Inventory of Hazardous Materials (IHM), ensure surveys and certification
 - *Hold* an Inventory Certificate (IC) and verified IHM Part I, valid for maximum 5 years; regular updates are to be verified during surveys.

- (B) Decision of recycling is made

- *Prepare* and, update IHM Part I, ensure surveys and certification
- *Hold* an IC and verified IHM Part I, valid for maximum 5 years; regular update will be verified during surveys.
- *Provide* the recycling facility with ship related information
- *Notify* in writing the Flag State within a time-frame to be determined by the Flag State

- (C) As the competent authority of the state where the EU-listed recycling facility is located approve the ship recycling plan tacitly or explicitly, there are two options depending on the type of approval

Option 1: "Recycling State" implements explicit approval of the ship recycling plan:

- *Receive* approved plan from recycling facility and information on approval from „Recycling State“

Option 2: "Recycling State" implements tacit approval of the ship recycling plan:

- *Receive* approved plan from recycling facility

- (D) Preparation for recycling

Until issuance of the Ready for Recycling Certificate (RfRC):

- *Update* IHM to incorporate Part II and III, request final survey (anywhere, inside or outside EU)
- *Hold* a RfRC, supplemented by IHM Parts I, II and III and ship recycling plan, maximum validity 3 months

Maximum three months from issuance of the RfRC:

- *Submit* a copy of the RfRC to ship recycling facility
- *Conduct* operations to minimise the amount of fuel, waste and cargo residues

(E) Ship arrival at ship recycling facility

- In case of the recycling facility declining to accept the ship because the condition of the ship does not substantially correspond to the RfRC, the shipowner *retains* responsibility and *must inform* the Flag State administration;
- RfRC is not valid anymore.

(B) Decision of recycling is made

- *Surveys* for issuance and renewal of IC (may be delegated to RO)
- *Receives* the written notification of decision of recycling from the shipowner
- Optional (depending on the requirements of their MS): *Sends* information and ship data to competent authority of the state where the recycling facility is located

3.1.2 EU Flag State Administration

(A) Ship operating in international trade

- *Surveys* for issuance and renewal of IC (may be delegated to RO)

Shipowner – responsibilities and procedures

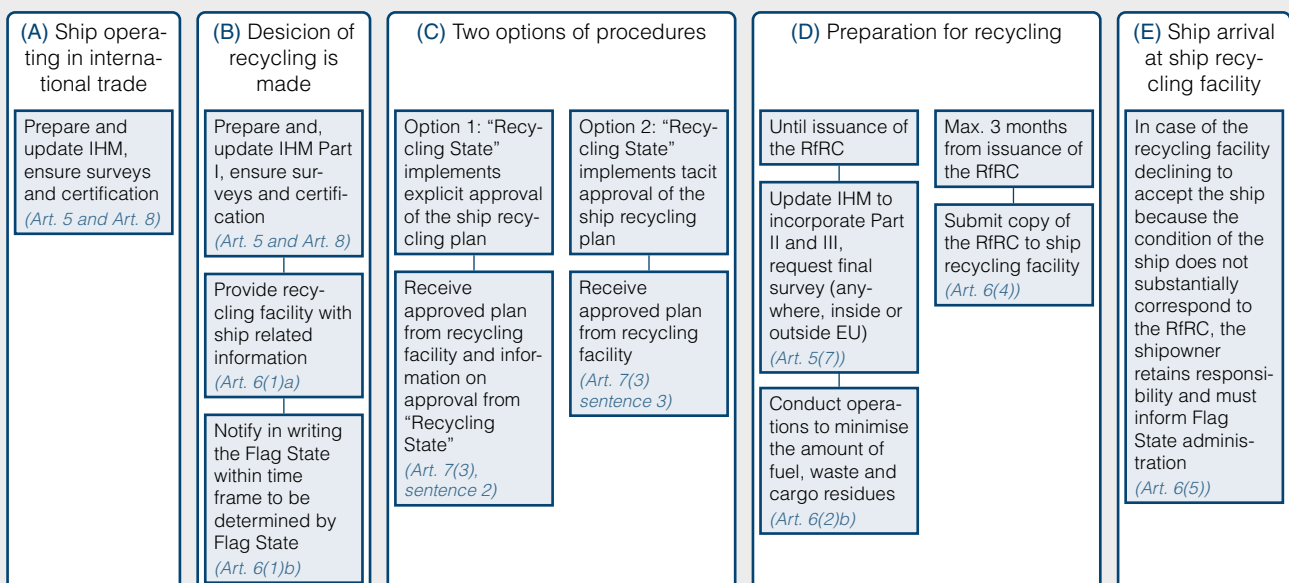


Figure 2: Shipowner (with ships flying the flag of EU/EAA country) – responsibilities and procedures.

(C) As the competent authority of the state where the EU-listed recycling facility is located approve the ship recycling plan tacitly or explicitly, there are two options depending on the type of approval

Option 1: "Recycling State" implements explicit approval of the ship recycling plan:

- Receive information on approval of ship recycling plan from competent authority of the recycling state
- Receive approved ship recycling plan from recycling facility

Option 2: "Recycling State" implements tacit approval of the ship recycling plan:

- Receive tacitly approved ship recycling plan from recycling facility

(D) Preparation for recycling

- Verify IHM Part I, II and III (may be delegated to RO)
- Conduct final survey (may be delegated to RO)
- Issue RfRC (may be delegated to RO)

Ship arrival at ship recycling facility:

- In case of the recycling facility declining to accept the ship because the condition of the ship does not substantially correspond to the RfRC, the Flag State administration *must* receive information from shipowner and *decides* on way forward.

(E) Ship recycling

- Receive report on readiness to start the recycling from ship recycling facility
- Receive notification from facility on completion of recycling within 14 days including a report on incidents and accidents

EU Flag State administration – responsibilities and control

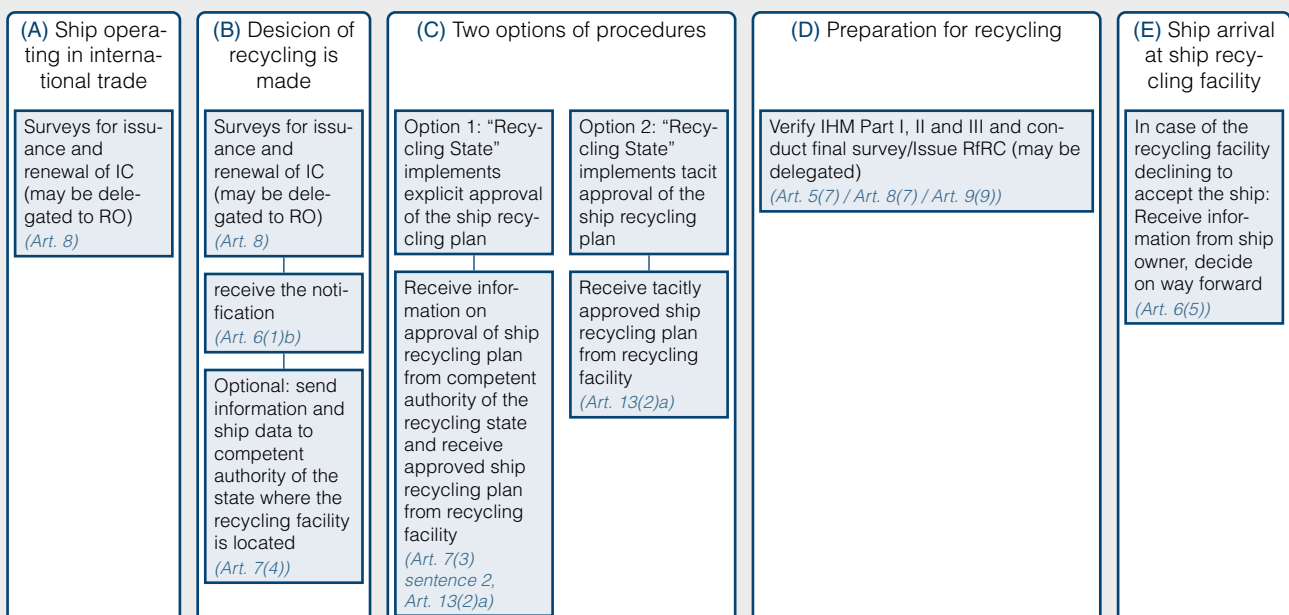


Figure 3: EU Flag State administration – responsibilities and control.

3.1.3 EU Port State Administration

For the EU, Port State administrations apply the control provisions in accordance with national law, having regard to Directive 2009/16 EC¹ (Art. 11) for the situation when:

- (A) The ship is operating in international trade (IC).
- (B) The decision of recycling is made by the shipowner (IC)
- (D) The ship is being prepared for recycling (RfRC)

The control provisions in accordance with national law, having regard to Directive 2009/16 EC (Art. 11, Art 12(5)) also apply to ships flying the flag of a third country, operating in international trade and calling at a port or anchorage of a Member State.

¹ Directive 2009/16/EC of the European Parliament and of the Council of 23 April 2009 on port State control

EU Port State administration – responsibilities and control

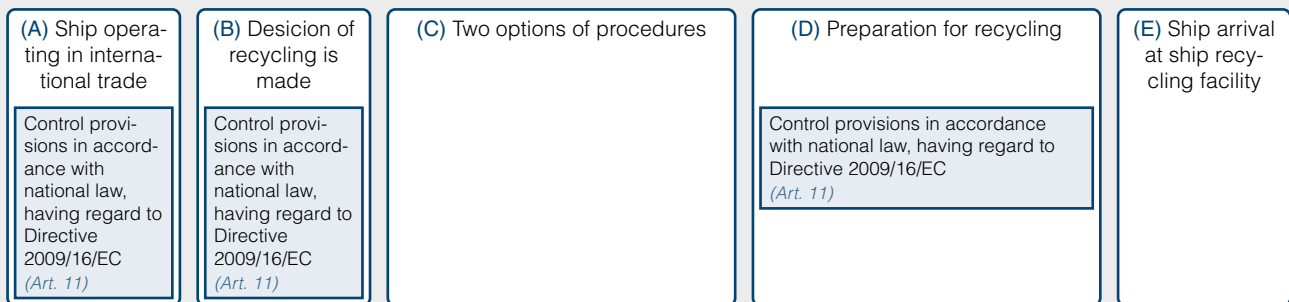


Figure 4: EU Port State administration – responsibilities and control.

3.1.4 Operator of the recycling facility

(A) Decision of recycling is made

- Develop ship recycling plan

(B) As the competent authority of the state where the recycling facility is located approve the ship recycling plan tacitly or explicitly. There are two options depending on the type of approval

Option 1: Explicit approval of the ship recycling plan:

- Receive information on approval of ship recycling plan from competent authority of the Recycling State
- Submit approved ship recycling plan to shipowner and Flag State

Option 2: Tacit approval of the ship recycling plan:

- Submit tacitly approved ship recycling plan to shipowner
- Submit tacitly approved ship recycling plan to Flag State

(C) Preparation for recycling

- Receives a copy of RfRC

Ship arrival at ship recycling facility:

- Regular situation: *accept* responsibility for the ship upon arrival

Option: *decline to accept* the ship if the condition of the ship does not substantially correspond to the RfRC

(D) Ship recycling

- Report to the Flag State on readiness to start the recycling
- Notify the Flag State on completion of recycling

Operator of the recycling facility – Obligation and procedure

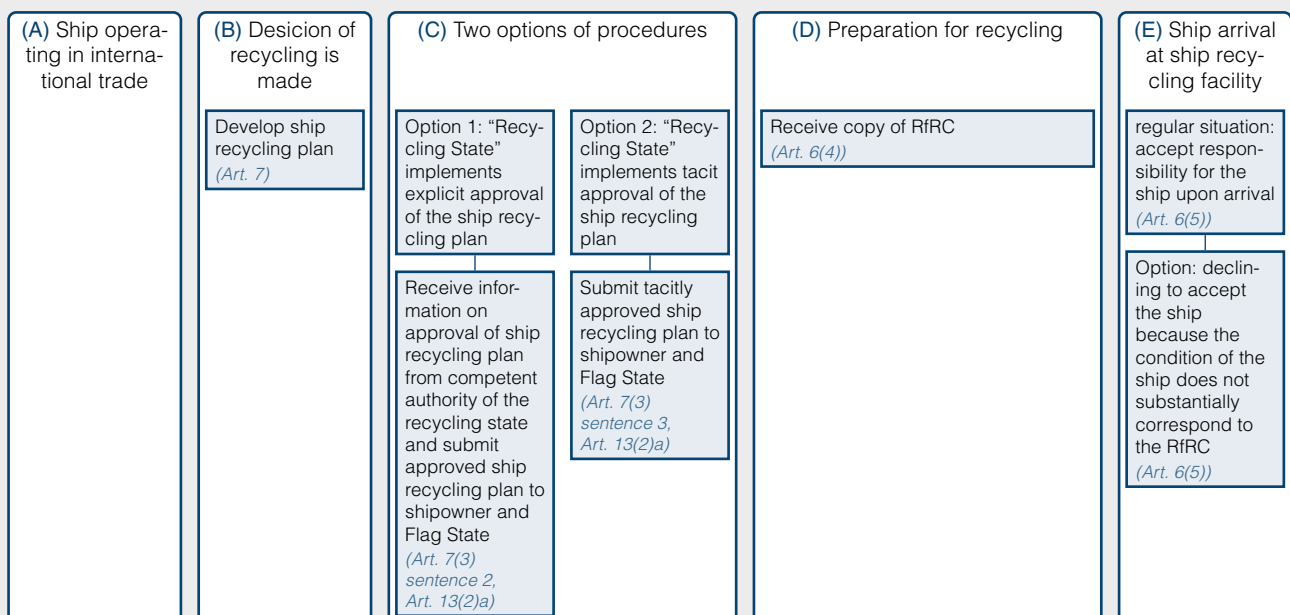


Figure 5: Operator of the recycling facility – Obligation and procedure.

3.1.5 Competent authority of the recycling facility

- (B) When the decision of recycling is made, the competent authority of the state where the EU-listed recycling facility is located *approves* the ship recycling plan either *explicitly* or *tacitly*. There is an option that the competent authority *receives* information and ship data from the responsible EU Flag State administration.
- (C) The next step depends on the type of approval in place for the competent authority where the facility is located.

Explicit approval of the ship recycling plan:

- *Notify* Flag State administration of the approval
- *Notify* ship recycling facility of the approval
- *Notify* shipowner of the approval

Tacit approval of the ship recycling plan:

- within a review period no written objection

3.1.6 Shipowner (with ships flying the flag of a third country)

- (A) Ship operating in international trade
 - *Prepare* and *update* IHM, ensure surveys and issuance of Statement of Compliance (SoC)
 - *Hold* a copy of the SoC and verified IHM Part I, valid for maximum 5 years

Competent authority of the state where the recycling facility is located – responsibilities

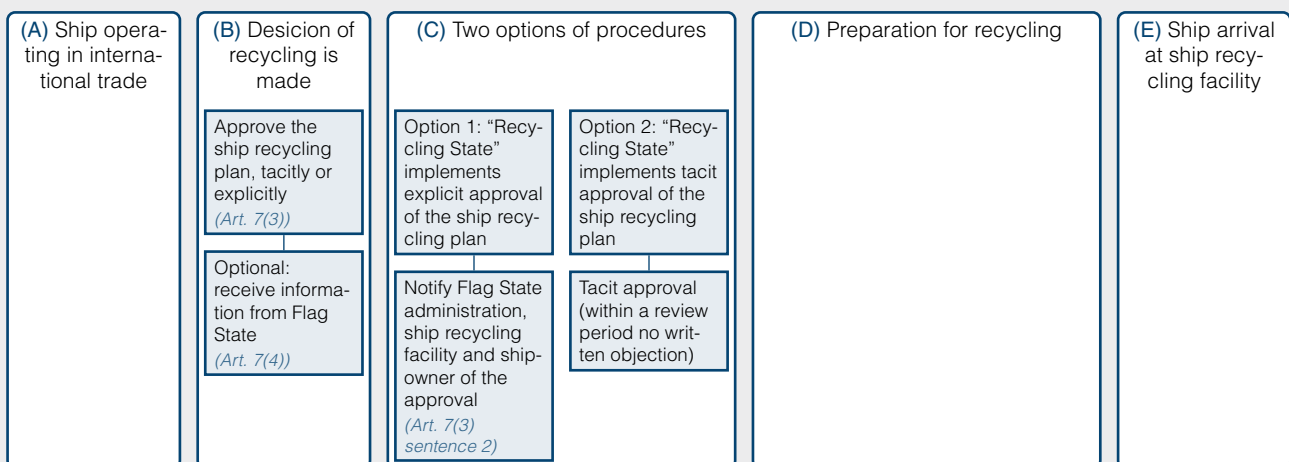
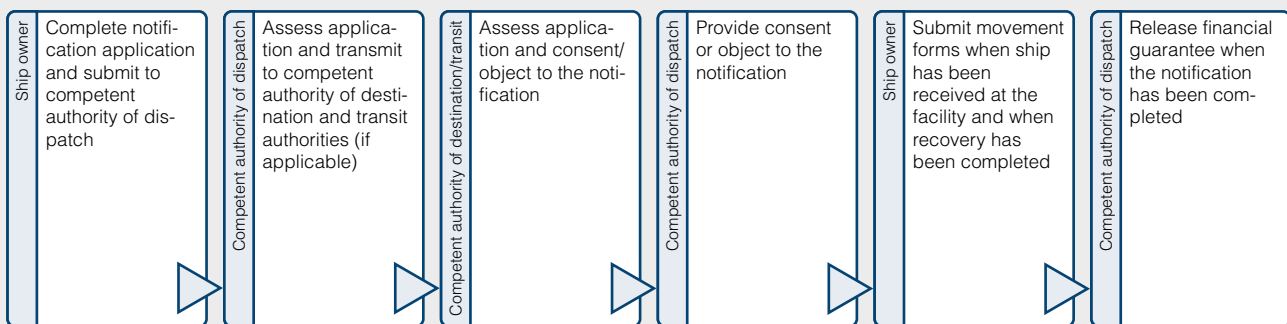


Figure 6: Competent authority of the state where the recycling facility is located – responsibilities.

4 Waste Shipment Regulation

Ships flying the flag of a non-EU/EEA country, or ships flying the flag of an EU/EEA state (but which are not under the scope of the EU SRR that is being moved internationally for recovery or disposal) are covered under the WSR.



If a ship is flying the flag of a non-EU/EEA country, the Waste Shipment Regulation 1013/2006/EC applies.

Assessment framework

A completed notification application should include:

- notification form,
- movement form,
- IHM parts I and II,
- NORM quantification survey (if applicable),
- Memorandum of Agreement (for Recycling),
- a contract between the notifier/exporter and the consignee/importer
- recovery information,
- recovery facility permit and downstream facility permits,
- list of intended carriers,
- intended route,
- P&I insurance and P&I cover note for intended carriers, and
- financial guarantee.

In accordance with Article 4(3) of the EU WSR any competent authorities concerned may request additional information.

Within 30 days of acknowledgment by the competent authority of destination, all competent authorities involved will consent or object to the notification (Article 9). If the recovery facility is pre-consented the time period is reduced to 7 days (Article 14(4)).

Completed movement forms must be provided to the competent authorities of dispatch and destination as evidence that the waste has been recovered or disposed of in accordance with the notification (Article 5(3c)).

As described in Article 6(8) the financial guarantee shall be released when the competent authorities concerned have received the appropriate certificates of recovery.

5 References

- [1] Regulation (EU) No 1257/2013 of the European Parliament and of the Council of 20 November 2013 on ship recycling and amending Regulation (EC) No 1013/2006 and Directive 2009/16/EC (SRR)
- [2] Commission Implementing Decision (EU) 2016/2325 of 19 December 2016 on the format of the certificate on the inventory of hazardous materials issued in accordance with Regulation (EU) No 1257/2013 of the European Parliament and of the Council on ship recycling
- [3] Commission Implementing Decision (EU) 2016/2321 of 19 December 2016 on the format of the ready for recycling certificate issued in accordance with Regulation (EU) No 1257/2013 of the European Parliament and of the Council on ship recycling
- [4] Commission Implementing Decision (EU) 2016/2324 of 19 December 2016 on the format of the report of planned start of ship recycling required under Regulation (EU) No 1257/2013 of the European Parliament and of the Council on ship recycling
- [5] Commission Implementing Decision (EU) 2016/2322 of 19 December 2016 on the format of the statement of completion of ship recycling required under Regulation (EU) No 1257/2013 of the European Parliament and of the Council on ship recycling
- [6] EMSA's Guidance on inspections of ships by the port States in accordance with Regulation (EU) 1257/2013 on ship recycling (2019)
- [7] EMSA's Best Practice Guidance on the Inventory of Hazardous Materials (2016)
- [8] Regulation (EC) No 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste (WSR)