Ship Recycling:
Time to Replace Political Perceptions with Technical Evidence



The debate about the inclusion of two Indian ship recycling facilities on the European List should be about compliance, environmental performance and measurable improvements – not generalisations, historical perceptions or the rejection of a particular recycling method.

The recent vote in the European Parliament's ENVI Committee against the proposed inclusion of two ship recycling facilities in Alang, India, has once again brought the future of international ship recycling into the political spotlight. With the objection now heading towards a plenary vote at the end of November, there is an important question that deserves more attention:

Are we assessing individual ship recycling facilities against the requirements of the EU Ship Recycling Regulation, or are we judging the image associated with their location and method?

These are two fundamentally different approaches.

1. The recycling method is not environmental performance

Ship recycling is carried out using four generally recognised methods: beaching, landing, alongside and dry docking. Each has specific technical characteristics, advantages and challenges.

However, none of these methods automatically guarantees safe and environmentally sound recycling. Equally, none should automatically be considered incapable of achieving the required standards without examining the actual technical arrangements.

A technical comparison of the different methods, which I prepared together with M.A.R.C. in 2013 and published in 2014, already highlighted this point: all four methods can meet the relevant legal requirements, although their individual technical challenges differ.

The decisive factors are the actual conditions and HSE-management of each facility: impermeable working surfaces, drainage, containment, hazardous-material handling, waste management, emergency preparedness, training, supervision and operational discipline.



Any guess where this is?

Social aspects matter as well. However, both the Hong Kong Convention and the EU Ship Recycling Regulation focus primarily on environmental protection, occupational health and safety. Wider social aspects, including labour rights, employment conditions and community welfare, remain largely outside their specific regulatory requirements, apart from references to the ILO framework. That does not mean social responsibility is unimportant. It means that additional social objectives need an appropriate legal and regulatory framework rather than being informally introduced into the EU-SRR assessment.

A recycling method is not a substitute for an assessment of all these factors – it's merely how to get access to a ship and then individual risks and precautionary measures are to be taken into account.

2. Historical pollution must not become a permanent judgement



There is no reason to defend the historical environmental damage caused by ship recycling and other malpractices. Nor should we overlook the pollution legacy of industrial activities in Europe itself.

The history of many ship recycling destinations, including those in Europe, demonstrates how seriously environmental protection was neglected in the past. Same applies to ports and shipyards. But history should be a starting point for improvement, not a permanent verdict on the future.

The relevant question is whether pollution is prevented today, hazardous materials are properly identified, contained and managed, and the facility can demonstrate that its operations meet the applicable requirements. This is particularly important when assessing facilities that have invested considerably in infrastructure, environmental protection and occupational safety over more than a decade.

Recognising measurable improvements is not about lowering standards. It is applying standards consistently. If other have to meet even higher standards due to national or local requirements it's even better, but the focus here is solely on compliance with EU-SRR.

3. Look beyond the boundary of the recycling yard

One important aspect of the EU-SRR is the management of waste after it leaves the recycling facility. Environmental responsibility does not end at the yard gate and compliance is also heavily depending on the individual approach of the facility, especially in case the local enforcement is uncertain.



The availability and performance of downstream waste-management facilities are essential. The EU-SRR itself recognises this by requiring evidence that receiving waste-management facilities operate according to standards broadly equivalent to international and EU standards.

This is an important distinction: equivalence is assessed through evidence of environmental and human-health protection, not simply through geographical location or comparing lists with threshold levels line by line. The audit findings concerning waste management in the hinterland of the proposed Alang facilities, indicating broadly equivalent standards, therefore deserve serious consideration.

The same applies to improvements in healthcare and emergency response for workers. These are not peripheral matters. They are essential elements of responsible ship recycling and should be recognised when supported by verifiable evidence.

4. General criticism does not replace individual assessments

Pressure groups have an important role in highlighting environmental and social risks. Their criticism should be taken seriously. However, general statements about beaching, entire regions or historical practices cannot replace a technical assessment of individual facilities today. Criticism is to be made ideally on hand of site visits or at least on hand of clear audit reports, not from a far distance.



If a facility has been inspected by officially appointed auditors, infrastructure, practices and management systems have been evaluated. The evidence demonstrates compliance with the requirements of the EU-SRR or not. For any judgement the evidence must be addressed directly.

It is not sufficient to reject an individual facility simply because it operates in a region or uses a method that has historically been associated with poor practices. Nor should the same level of scrutiny be selectively applied to some recycling methods while shortcomings at facilities using other methods receive less attention. Treating one method as „evil“ by principle without detailed comparison means propaganda for others without clear facts.

Consistency means applying the same objectives to every facility, irrespective of location, additional requirements or recycling method.

5. What are we actually trying to achieve?

There are two further considerations that should not be ignored.

First, European ship recycling facilities deserve a viable market, recognition for their investments and also individual evaluation. However, protecting European competitors from international competition cannot be the objective of environmental legislation nor sustainability, which is needed globally.

> European facilities can better focus on the vessels and market segments they can realistically serve, including smaller and regional vessels. Large commercial vessels, despite that only very few facilities in Europe can accommodate them, operate in an international market, and their owners will make decisions based on available capacity, commercial conditions, flag requirements and recycling options. This fact does not mean that ESG-aspects are ignored entirely, but they can and here lies a specific risk which is not properly considered so far. Trying to avoid change off flag or establishing a recycling fund has been proposed to avoid this, but both fail to stand up to reality.

Second, rejecting facilities that could demonstrably meet EU requirements does not create additional recycling capacity. It risks to seriously harm European shipowners and foreign owners of EU-flagged vessels due restricting the options available. Shipping will face a significant increase in demand for recycling, without sufficient EU-approved recycling capacity there is no other option than changing flag.

> There is a wider strategic issue here: if regulatory decisions make EU-flags increasingly unattractive for older vessels, owners may choose to reflag their ships well before recycling. This risks moving vessels outside the direct scope of EU requirements and reducing the very influence Europe seeks to exercise, plus overall loss of importance of EU in international shipping. The results could be less transparency, less control and fewer opportunities to promote responsible recycling.



6. Keep the EU Ship Recycling Regulation separate from other political objectives

The EU-SRR establishes a legal framework with defined requirements for ship recycling facilities located outside of EU for their inclusion in the European List. If a facility meets those requirements, its application should be assessed accordingly. If it does not, the deficiencies must be identified and addressed. Same should be applied within EU, but the approval lies in the hand of national and local administrations which can lead to entirely different approaches and outcomes.

Other considerations, such as European industrial resilience, strategic autonomy, market protection or geopolitical interests, may be legitimate topics for political discussion. They should be dealt with through the appropriate strategies and legal instruments and rather than being mixed into an assessment that is supposed to evaluate compliance with the EU-SRR.

The real objective: No further pollution - anywhere

The ultimate objective should be straightforward: no further damage to health, safety and environment caused by ship recycling, wherever it takes place. Ensuring fully controlled recycling and promote re-circulation of materials ist he responsibility of shipwners as like ship recyclers. It is a dirty business, but not necessarily a polluting one.



We should welcome improvements, demand continuous progress and hold every recycling facility accountable for its performance as well as shipowners for the decisions taken. But we should also be prepared to recognise when facilities have made substantial progress and can demonstrate compliance with internationally recognised and European requirements.

The upcoming plenary vote is therefore about more than two facilities in India. It is about the credibility of the European regulatory framework. Are we willing to recognise demonstrated compliance, even when it challenges established perceptions? Or are we allowing historical images and generalised criticism to determine the outcome?

The EU-SRR is not a political instrument to prejudge or protect one recycling method or market. It is an environmental and safety regulation. It must remain evidence-based, predictable and consistent. Let us apply and judge it accordingly.

7. Moving forward together: Responsible ship recycling requires shared responsibility

Lasting progress in global ship recycling cannot be achieved by regulation or individual facilities alone. It depends on constructive cooperation across the entire maritime value chain.

Shipowners, recycling yards, flag states, classification societies, independent auditors, regulators, NGOs and civil society all have distinct roles to play. When shipowners commit to transparent inventories of hazardous materials and thorough due diligence, and when recycling facilities invest in safe infrastructure, training and downstream waste management, measurable improvements become possible. At the same time, regulators and auditors ensure that standards are applied fairly and consistently, while constructive dialogue with NGOs and local communities keeps attention focused on continuous improvement.



Rather than treating ship recycling as a conflict between industries, regions or methods, it should be approached as a shared industrial, environmental, and sustainability responsibility. A circular maritime economy only works when all stakeholders, from cradle to grave, cooperate based on facts, mutual accountability, understanding, and a common commitment to protecting people and the environment - wherever and whenever a vessel reaches the end of its operational life.

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