

**Our diverse and global Membership trades in many jurisdictions with differing regulatory requirements. As a Club we are committed to promoting sustainable ship recycling practices to assist in safeguarding our environment and ensuring the safety and wellbeing of workers involved in the shipbreaking process. We recognise the importance of responsible ship recycling in reducing the environmental impact of end-of-life vessels and supporting the circular economy within the maritime industry.**

Through our proactive initiatives and collaboration with industry stakeholders, we strive to influence the undertaking of the highest standards of ship recycling in compliance with international regulations and guidelines.

By advocating for green ship recycling and offering our support and expertise, we aim to create a positive impact on the maritime sector and contribute to a greener and more sustainable future for all.

## THE CURRENT REGULATORY ENVIRONMENT

Ship recycling is subject to a multitude of regulations and guidelines aimed at ensuring safe, environmentally responsible, and socially sustainable practices. The prominent international frameworks include the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, The Basel Convention, and the European Union Ship Recycling Regulation. Our dual aim is to help our Membership navigate this increasingly diverse and complex regulatory landscape and to promote a greener and more sustainable future for ship disposal.

### The Basel Convention 1989

The Basel Convention has been adopted by 187 countries worldwide, and sets out requirements for notice, consent and tracking for movement of waste across national boundaries; it places a general prohibition on the exportation or importation of waste between parties and non-parties.

The Convention was amended in 1995 when the Basel Ban Amendment was adopted. This amendment prohibits the export of hazardous wastes from member countries of the Basel Convention to non-member countries, particularly those classified as developing countries. The Ban Amendment was opposed by some nations and did not enter force until December 2019.

### The SRR (European Ship Recycling Regulation EC NO. 1257/2013)

The Basel Convention and the Ban Amendment were implemented in the EU by the EU Waste Shipment Regulations (WSR), which came into force in 2007. The WSR has now been superseded by the European Ship Recycling Regulation EC NO. 1257/2013, referred to as the SRR, which came into force on 31 December 2020. Norway, Switzerland and the UK also have similar implementing legislation.

The SRR applies not only to EU-flagged ships but also to non-EU flagged ships when they are calling at EU ports.

The SRR mirrors the green passport requirements in the Hong Kong Convention (see below) which require EU flagged vessels to:

- Have on board an Inventory of Hazardous Materials (IHM);
- Undertake surveys (roughly every five years) to check, amongst other things, that the inventory is up to date;
- Develop a ship recycling plan prior to recycling; and

- Only be sent for recycling at yards on the approved European List. The list was last updated on 11 November 2020. There are approved yards in various EU countries, the UK, Turkey and the USA but not in the Indian Subcontinent.

Obligations under the SRR are on ships and ship owners, and the SRR also requires EU Member States to legislate for penalties for infringements of the SRR. The EU Member State has discretion on the type or level of penalty, and the SRR provides that the penalty may be civil or administrative and must be “effective, proportionate and dissuasive”. The SRR is enforced through port state control inspections.

On 19 January 2026, the European Commission adopted standardised certificate formats to allow for one combined certificate to satisfy both the SRR and the Hong Kong Convention (HKC) for the Safe and Environmentally Sound Recycling of Ships (see further below). This reduced the administrative burden on owners, with them being required to have one combined certificate. The new single certificate came into effect on 9 February 2026.

### **The Hong Kong Convention (HKC) for the Safe and Environmentally Sound Recycling of Ships**

The HKC was adopted at a conference attended by 63 countries in 2009 but did not receive sufficient ratification until 2023. It finally entered into force on 26 June 2025.

The key requirements of the Convention, which mirror in parts the requirements of the SRR, oblige ships sent for recycling to carry an IHM specific to each vessel and for there to be a system of notifications as the ship is readied for recycling. In addition, ship recycling yards are required to provide a ship recycling plan, specifying the manner in which each individual vessel will be reused, depending on its particulars and its inventory.

It is noteworthy that the HKC does not have any country-based limitation on where a ship may be recycled. Accordingly, ships and ship owners complying with Convention may not still satisfy the requirements of the Basel Convention or the SRR (or other non-EU Member state legislation that restricts where ships can be recycled).