In this quarterly publication, the NGO Shipbreaking Platform informs about the shipbreaking industry in Bangladesh, India and Pakistan. Providing an overview of vessels broken on the beaches of South Asia, accidents, recent on-the-ground legislative and political developments including our activities in South Asia, we aim to inform the public about the negative impacts of substandard shipbreaking practices, as well as positive steps aimed at the realisation of environmental justice and the protection of workers’ rights.

In this edition you will find out more about several accidents in the shipbreaking yards in Bangladesh and a revived High Court order, the effects of the European Union standard for sustainable ship recycling, and the story of the illegal export of the Horizon Trader. In the first quarter of 2016, 239 large commercial vessels were sold for breaking, 189 of these were beached in South Asia. So far this year at least seven workers have lost their lives at the shipbreaking yards in Bangladesh.

**OPINION FROM SOUTH ASIA:**

After a long legal struggle for better regulation of the shipbreaking industry in Bangladesh, we obtained a clear ruling from the High Court in 2009. Not only did the Court’s ruling lead to the temporary closure of the shipbreaking yards, but it also asked the Government to come up with a clear set of rules and to set up a committee to supervise the shipbreaking industry in an impartial and independent manner. The Court held that Bangladesh must implement the Basel Convention requirements: that is, for instance, following the procedure of Prior Informed Consent when allowing for the import of an end-of-life vessel.

Since 2009, however, we have been waiting in vain to see the Government pass and implement stricter regulation on the shipbreaking industry in line with the Court ruling.

A recent contempt rule addressing government officials and the president of the Bangladesh Ship Breakers’ Association has now finally been issued due to this monumental failure of the government agencies in regulating the shipbreaking industry. The Court has reacted to the facts that weak rules have been passed but not implemented, that no impartial supervisory committee has been set up, and that toxic end-of-life vessels continue to be imported with the help of fake certificates claiming the ships are free of hazardous waste.

The failure to regulate shipbreaking activities in Bangladesh is deliberate and has caused the death of more than 50 workers since 2009. Many more workers have been injured and tons of hazardous waste have entered our country in an uncontrolled manner. Somebody has to take responsibility for these deaths, and for the pollution. We strongly believe that such injustice cannot go unaccounted for. The contempt ruling, we hope, will eventually identify the culprits and lead to a process of compliance that will fundamentally change the currently prevailing culture of defiance of the industry.

Advocate Rizwana Hasan
Chief Executive
Bangladesh Environmental Lawyers Association
OFF THE BEACH!

239 end-of-life ships were sold for breaking in the first quarter of 2016, according to the data collected and analysed by the NGO Shipbreaking Platform.

Seventy-nine per cent of end-of-life ships ended up on South Asian beaches, making this quarter one of the worst ones in the last years for non-beaching yards around the world.

Out of 189 vessels that reached the shores of India, Pakistan and Bangladesh, 127 were bulk carriers. As opposed to 2015 trends, India has again become the favorite final destination.

68 ships sold to South Asia in the first quarter of 2016 were owned by EU owners. Greek owners topped the list with 40 ships sold to South Asian breakers. German owners followed with 16 ships. Also Chinese, South Korean and Monaco owners rank high on the list – all selling several vessels to Bangladesh where conditions are known to be the worst when comparing all three South Asian shipbreaking countries.

Monaco Zodiac Group, and Germans Konig & Cie GmbH & Company KG and Rickmers Reederei GmbH & Cie KG top the list of worst dumpers this quarter. These companies have previously been criticised by the NGO Shipbreaking Platform for their substandard end-of-life management.

Whilst grey- and black listed flags, such as Comoros and St Kitts and Nevis, continue to be particularly popular for end-of-life ships, also ships registered under the flags of Cyprus and Malta ended up on the South Asian beaches. A new EU Regulation on ship recycling will prohibit the dismantling of EU-flagged ships in substandard yards. However, by simply flagging out to a non-EU flag before selling the ship for scrap, ship owners can easily circumvent the EU laws. 35 ships, including two Greek flagged ships, one Belgian flagged ship and one Malta flagged ship, changed their flag just weeks before hitting the beach.
ALREADY SEVEN FATAL ACCIDENTS IN THE BANGLADESH SHIPBREAKING INDUSTRY SINCE JANUARY

In the first four months of the year, the Platform has already documented seven fatal accidents in the shipbreaking yards of Bangladesh – and at least four more workers have been seriously injured. The accident record of 2016 is again alarmingly high and illustrates the unacceptable working conditions in the shipbreaking yards.

In January, the worker Md. Ali Akkas was killed at Asadi Steel Shipyard by a falling iron rod. The yard was busy scarping the FELICIA (IMO 9154139), a bulker owned by Greek Coronis Shipping. Only some days later, two unidentified workers were injured in a fire at Allahr Daan shipbreaking yard. Their condition is unknown. On 19 February, a steel rope suddenly tore while pulling up heavy steel parts from a beached vessel. 32 year old Palash, the winch operator, was killed instantly at Habib Steel Shipbreaking. On 4 March, Shafiqul was killed at OWW Trading & Ship Breaking. A heavy part cut from the vessels was moved on a rope, which tore and crushed Shafiqul who was working underneath. The local police has filed a case for the unnatural death of Shafiqul; however, nobody has been held responsible. Three more suffered severe injuries. In October, another worker was killed at S.N. Corporation when he got struck by a falling steel plate.

The series of accidents continued in March and April: worker Morsalin fell while working at SL Shipbreaking Yard on 16 March. The young man of 20 years later succumbed to his injuries at the Medical Collage Hospital. On the same day at Mahin Steel, worker Joramtal Minaj suffered from a heat stroke, a sign of the harsh working conditions at the shipbreaking yards. He was only 43 and reportedly died at the BSBA hospital. On 28 March, young worker Sumon and his brother Delwar were run over by a truck operating at Kabir Steel shipbreaking. Sumon died on the spot while Delwar was brought to the hospital (see box). In April, two young workers, Biblob and Jasmim, suffered from the inhalation of toxic gases while working on a beached vessel at Premium Trade Corporation. Biblob died at the Medical College hospital.

The accident record of the first four months shows a well-known pattern: the most common serious and fatal accidents in the Bangladesh shipbreaking yards are caused by fires and explosions, falling from great heights, heavy parts and iron rods falling and crushing workers, toxic gases, and the rift of iron ropes used to pull heavy parts from the intertidal zone further up the beach. All these accidents are a result of unsafe working conditions and negligence, such as lack of proper personal protective equipment as well as the absence of modern infrastructure, such as cranes and stable ground from where to operate machinery and equipment. Cutting down end-of-life vessels in the intertidal zone exposes workers to an unnecessary risk.

SO CALLED “GREEN” AND “ETHICAL” CASH BUYERS TRADE WITH SUBSTANDARD SHIPBREAKER: WORKER MOMINUL SEVERELY INJURED

On 13 March, the young worker Mominul was severely injured at the shipbreaking yard used by the companies Seiko Steel, Darussalam and Madina. The 20 year old man had not been provided with adequate safety equipment. While working he fell from great height and suffered a severe back injury. Mominul is now in a very bad state and is still laying at the Chittagong Medical College. The young man may stay disabled.

The vessels broken at the yard at the time of the accident were the BERGE MATTERHORN and the RENATA N. The BERGE MATTERHORN (IMO 9113915) was owned by Norwegian ship owner Berge Bulk and was flying the flag of the Isle of Man. It had been sold to Bangladesh by cash buyer GMS. The RENATA N was handed over for demolition by German ship owner Neu Seeschiffahrt GmbH via cash buyer Wirana.

The case clearly shows that the two leading cash buyers – despite their “green” and “ethical” ship recycling programmes – sell end-of-life vessels to any yard, including the worst yards in Bangladesh. For the plot operated by Seiko, Darussalam and Madina, the Platform has recorded fatal accidents in 2013, 2014, 2015, and now in 2016, the accident severely injuring Mominul. In 2014, the Platform raised the case of 25-year-old worker Babul Das who was crushed under a falling steel plate at Seiko shipbreaking. The vessel he was working on at the time belonged to well-known Singapore-based ship owner Neptune Orient Lines (NOL) - the company never reacted after the incident.

If cash buyers GMS and Wirana were serious about ensuring clean and safe ship recycling throughout their business activities, they would at least blacklist the worst shipbreakers with the worst accident records, such as Seiko, Darussalam and Madina. Instead, GMS and Wirana continue business as usual, seeking only the highest profits, in disregard of safety and environmental protection standards.
BANGLADESH SHIPBREAKERS OPERATE HOSPITAL, BUT STILL NO SOLUTION FOR TREATING SEVERE INJURIES

In January, the Platform was informed that the Bangladesh Ship Breakers’ Association (BSBA) opened a hospital in the shipbreaking zone, north of the port city of Chittagong. According to local sources, the hospital can now treat small injuries and dispense medicine. The BSBA did not want to give a statement to the Platform.

In the shipbreaking yards, accidents happen every day: small cuts, minor burn wounds and bone fractures, but also fatal injuries due to falls, explosions, intoxication or dropping steel plates. For severe injuries workers have to be taken to the Medical College in Chittagong. Depending on traffic, this is a one to two hour drive. In lack of an ambulance, workers need to find motor rickshaws to bring their injured co-worker to the hospital. In some cases severely injured workers have only arrived to the hospital 6 to 10 hours after the accident occurred. Many workers have died on their way to the hospital. The need for a proper facility to attend seriously injured workers is sorely needed.

Already six years ago, the BSBA built a hospital in Sitakund, close to the shipbreaking yards. When Platform members visited the hospital in September 2014, not a single doctor was present. The six-floor building was void of any activity and not a single patient was treated although accidents occur daily and the local community is desperately in need of health care facilities. The entrance way to the shiny glass building was blocked, so that no ambulance can reach the entrance directly.

The hospital is reportedly now run by a group of doctors as a private clinic. It is unclear whether the treatment is free for all shipbreaking workers. In any case, the hospital is unable to treat severe burn wounds, fractured bones or spine and head injuries, so the severely injured still need to be taken to Chittagong. The case of the dead worker Shafiqul (see previous page) illustrates the problem: after his severe injury at OWW Trading & Shipbreaking he was sent to the local BSBA hospital. However, it could not offer the necessary treatment and Shafiqul was transported to the Chittagong Medical College Hospital where he died during the night.

SHIPBREAKING YARD’S PRIVATE SECURITY PERSONNEL FIRE SHOTS AND INJURE SEVEN PEOPLE

In the morning of 28 March, shipbreaking worker, Sumon, was killed on a private road inside Kabir Steel yard, located north of Bangladesh’s major port city, Chittagong. His brother, who works at the yard as well, was seriously injured in the same accident. According to local sources, Sumon was run over by a truck transporting steel plates from the yard. The yard management refused to take responsibility for the accident with the argument that the truck was owned and operated by another company.

At around 11 a.m., locals gathered outside the yard in protest and blocked traffic on the highway. They claimed, according to the English daily newspaper The Daily Star, that the company was withholding Sumon’s body inside the yard, which the yard denied. The protestors were angry and desperate at the situation. The private security personnel employed by the shipbreaking yard started shooting at the group. According to Bangladeshi newspapers, one of Kabir Steel’s guards injured seven people.

The Platform and its members, as well as local and international trade unions, criticised the use of violence against unarmed protestors. It called on the police to impartially and thoroughly investigate the case and to bring those responsible to justice. The incident illustrates the climate of violence and despair surrounding the shipbreaking yards.

Kabir Steel has claimed that the yard is not responsible for the accident and that working conditions at the yard are safe. The yard is part of the large industrial conglomerate of Kabir Group of Industries. The Platform has documented several severe and fatal accidents in the yard over the last years. In 2014 alone, at least 2 workers were killed and six more severely injured at Kabir Steel’s shipbreaking yard and re-rolling mill in four different accidents. This includes the case of three workers who suffered severe burn wounds after an explosion on a Norwegian-owned oil tanker used by Teekay Corporation. In another accident in the same yard, on 30 March 2016, cutter helper Md. Abdus Salam fell down from a beached vessel due to the lack of safety measures at work. As a result, he suffered serious injuries including several fractures in his arms and legs.

The Platform welcomes that IndustriAll Global Union has sent a letter to the Prime Minister of Bangladesh. It joins the trade union’s call for proper investigation and for the rightful punishment of both negligent yard owners and of security guards for the violent assault of protestors.

Click here to access IndustriALL’s press release on the incident.
Click here to access The Daily Star’s article covering the incident.
DEVELOPMENTS

BEACHING YARDS WILL NOT MEET EUROPEAN UNION STANDARDS FOR SUSTAINABLE SHIP RECYCLING

On 12 April the European Commission (EC) published technical guidance for ship recycling facilities that want to be approved under the EU Ship Recycling Regulation. This guidance was in the form of FAQs, hence is not legally binding, but it explains in more detail the requirements under the Regulation. For instance, it goes into more depth about the specific needs to ensure safe working conditions, pollution control, including proper downstream waste management and enforcement of international labour rights for those facilities that intend to be EU-listed.

There have been attempts by some Member States with strong shipping interests to water down the requirements of the Regulation. In particular, they have tried to portray beaching facilities in South Asia as environmentally friendly and safe for workers in order for those yards to make it onto the list, but these have not been successful. In fact, the technical guidance clearly excludes the possibility for the low-cost method of beaching to be an approved practice by the EU. It is very likely that individual facilities in Europe, China and Turkey will feature on the EU list, though some of these yards will be required to improve their practices before being able to meet the European standards.

On the other hand, given the demands under the EU Ship Recycling Regulation together with its technical guidance, yards in South Asia, still exclusively reliant on the beaching method, will not be able to meet the required standards in order to be EU-approved for the List. This means that ships flying EU flags will not be allowed to be recycled in South Asia. Consequently, we are expecting to see EU-flagged vessels no longer being broken in South Asia. However, the number of ships being broken in total on the South Asian beaches will most likely not be affected by the disappearance of EU ships: ship owners can easily flag out to another non-EU flag in order to circumvent the EU Regulation.

It is only through the introduction of a financial mechanism, encouraging ship owners to make use of the EU-List of approved facilities (regardless of the flag of their fleet), that the Ship Recycling Regulation will have a real effect.

MAERSK LINE ACCEPTS LOWERING THEIR STANDARD FOR SHIP RECYCLING AND HEADS BACK TO BEACHING YARDS

Maersk declared in February to start cooperating with Indian beaching yards as part of the container ship giant’s new ship recycling policy. Maersk was previously guided by a progressive policy on ship recycling: its old vessels were dismantled in modern ship recycling facilities in either China, Turkey or Europe. Maersk’s decision to resort to the low-cost method of beaching in India undermines European efforts to improve global conditions and the company’s position as industry leader. In times of low freight rates, Maersk intends to boost its profits by selling to yards that do not comply with European standards.

All yards in Alang dismantle vessels in the intertidal zone. This means that ships are broken in an unprotected marine environment – a method which has been identified at the international level as one that needs to be phased-out and that European law has banned. Environmental concerns remain linked to the abrasion of toxic paints during the beaching process and when cut-off blocks and hulls are winched further up the beach, oil spills and the release of slag and paints chips into the water, and the debris created by the gravity method when blocks crash down on the intertidal beach. Moreover, working and living conditions in Alang remain inadequate. The lack of decent accommodation will not be solved before the first Maersk vessels arrives in Alang, nor will there be access to a proper hospital specialised in accidents and burn wounds. Maersk seems also to ignore the lacunae of proper downstream waste management in India: asbestos-containing materials can and are re-sold freely and PCBs cannot be properly destroyed. These issues are not dealt with by the Hong Kong Convention – for a European Union approval these problems will however need to be addressed.

The Platform and its member Transport & Environment strongly criticised Maersk’s decision, but will continue its dialogue with the Maersk Group to ensure that Maersk will do an impartial and thorough environmental impact assessment and share its findings publicly.

JAPANESE GOVERNMENT HOSTS CONFERENCE ON SHIP RECYCLING IN LONDON

The Japanese government invited governments, industry stakeholders, trade unions and the NGO Shipbreaking Platform to discuss the situation in South Asia and also to boost ratification of the IMO’s Hong Kong Convention. The Platform and trade unions delivered a common message: conditions at the South Asian shipbreaking yards remain alarmingly dangerous and dirty. The representative of the Government of Bangladesh emphasised that there is currently no hazardous waste storage and treatment facility in Bangladesh, a fact that makes it difficult for Bangladesh to meet international and European standards. Only four States have ratified the Hong Kong Convention so far - amongst the shipbreaking states present at the London event, only Turkey indicated that they are undergoing the process of ratification.
One of the world’s largest flag states, Liberia, expressed at the event that they would await ratification by South Asian breaking states before ratifying the Convention themselves. Thus, there seems to be a very small likelihood that the Hong Kong Convention will enter into force any time soon. The new EU Ship Recycling Regulation will, however, be applicable by the end of 2018 at the latest. It sets a higher standard for ship recycling than the Hong Kong Convention and has a potential of having a global effect, especially if a financial incentive is introduced to support its implementation.

OIL & GAS INDUSTRY HITS THE BEACHES

In the last few months, the NGO Shipbreaking Platform has documented more and more oil platforms, drill ships and other vessels related to the oil industry arriving for demolition on the beaches of South Asia, as well as in Turkey and China.

There are a variety of platforms and vessels that function in the offshore oil industry, but the ones that we are most concerned with are those that can move on their own. Fixed platforms and compliant towers are attached to the ocean floor with giant submerged steel or concrete towers and are not transported around the world for demolition. However, semi-submersible platforms, drill ships, and floating production systems (FPSO – Floating Production, Storage and Offloading System) move on their own and are likely to end up on the shipbreaking beaches of South Asia.

Last year, the Platform documented the decommissioning of a total of 24 vessels related to the oil and gas industry (13 drill platforms, 1 drill ship, 8 FPSOs and 2 semi-submersibles). Out of the 24, the majority were sold to yards in Aliaga, Turkey (13 out of 24), the rest being divided between Bangladesh with 6, India with 3 and Pakistan with 2. So far in 2016, 4 such vessels have been documented for breaking: two drill ships to India, an FPSO to Pakistan and a drill-platform to Turkey.

Of particular interest are the stories of the drilling rig Noble Discoverer and the drill ship Ocean Clipper. The Noble Discoverer, a drilling rig owned by Noble Drilling Corporation, yet contracted by Shell, ended up in Alang, India in 2016. Artic Watch, a focus group that belong to Greenpeace, which focuses on conducting investigations, intelligence, news and insights on the oil dynamics in the arctic, initially reported on the case. The Ocean Clipper, a drill ship that was owned by Diamond Offshore Limited and contracted to Petrobras, the Brazilian oil giant, ended up in Alang in 2016.

The story of the Ocean Clipper is unfortunately a familiar one, resembling that of the oil rig Noble Paul Wolff, also contracted by Petrobras for operations off the Brazilian coast up until November 2014. In Spring 2015, Noble Corporation sold the structure to Bangladeshi yard, Siri Zubedar, aided by a cash buyer. Siri Zudebar holds a particularly bad reputation after the Platform and National Geographic documented severe and fatal accidents that have over the recent years taken place in the yard. Noble Corporation did not respond to the Platform’s outreach for dialogue and has showed no improvement in responsible behavior.

Noble Paul Wolff in Chittagong, Bangladesh
2015 DUMPERS LIST PUBLISHED
In February the Platform published its list of ships broken in 2015, including the list of companies who were the worst dumpers. 768 large ocean-going vessels were sold to the scrap yards last year. 469 were broken on the beaches of India, Pakistan and Bangladesh where shipbreaking yards do not provide fundamental labour rights, ignore international waste trade law, and fail to respect international environmental protection standards. Compared to last year, there has been a decrease in the total number of ships sold for breaking, yet there is no significant change in terms of proportion of ships sent to beaching yards. It terms of tonnage broken, Bangladesh was the number one destination for end-of-life ships.

The worst dumping country in 2015 was Greece, with Greek ship owners selling 87 ships, which is most of them, to beaching yards. The Platform assigned its Worst Dumper Prize to Idan Ofer, owner of Quantum Pacific Group. Combined with Israel Corporation, in which it has controlling power, the shipping companies sold 9 ships for their sub-standard breaking in South Asia.

HORIZON TRADER GOING TO INDIA
In mid-2015 Matson Inc. sold the Horizon Trader, a 42-year-old container vessel, for recycling at the All Star Metals in Brownsville, Texas. In September 2015, however, All Star Metals re-sold the vessel that it was supposed to recycle to a breaking yard in India. The last owner of the Horizon Trader, Matson, stated that it did not know about the re-selling of the vessel as it had intended for it to be recycled in the USA. Our member organisation, BAN, tracked the journey of the disguised Horizon Trader all the way to Alang, where it was beached on 8 January 2016.

Not only was the beaching in India contrary to the wishes of the last beneficial owner, but given that the Trader had been classified as waste before leaving US waters, the towage was in breach of US environmental laws. BAN alerted the authorities in the US – and also in Mauritius, Trinidad and Tobago, Namibia (transit countries that the Trader passed by along its journey) and India – that such export was in breach of the Basel Convention. However, each country failed to intervene to halt the illegal transport and prevent it from being run aground in Alang, hence ignoring their obligations under the Convention. The reason for the sale between All Star Metals and the Alang beaching yard are not clear. Yet it is clear that the hazardous waste management costs of the Trader would have been significantly higher in the U.S., perhaps even higher than the value of scrap metals contained in the vessel, especially with commodity prices so low.

Meanwhile, in India the hazardous waste management costs are not an important consideration. Hazardous waste streams, PCBs in particular, are not treated or disposed of with the necessary care, therefore sending the dead vessels to be scrapped on the beach in Alang is noticeably cheaper.

There is however, the hypothesis of an involvement of cashbuyers to make a greater profit from the breaking of the Horizon Trader. There is a connection between All Star Metals in Brownsville and the cashbuyer EXIM Inc. Officially, the subsidiary of EXIM Inc, Riya Shipping Corporation, results as the final owner of the Horizon Trader. The owner of Riya Shipping Corporation is a man called Harshad Shah, whose son, Nikhil, is President of All Star Metals in Brownsville. If these links had anything to do with the fate of the Horizon Trader, then there may have been a very close arrangement between the final owner, the cashbuyer and the ship recycler.

BANGLADESH HIGH COURT ISSUES CONTEMPT RULE AGAINST GOVERNMENT OFFICIALS AND BANGLADESH SHIP BREAKERS ASSOCIATION
On 11 April, the Bangladesh High Court issued a contempt rule asking 14 Government officials and the president of the Bangladesh Ship Breakers Association (BSBA) to explain why they have not implemented the Court’s judgement dating March 2009. The Court now demands arguments from the respondents as to why they should not be held responsible for contempt of the court’s rulings and “for deliberately and persistently ignoring safety of the workers and safety and integrity of the environment”. The Government was also meant to form an independent committee for the impartial supervision of the shipbreaking activities.
The Court decision is the result of a contempt petition submitted by the Bangladesh Environmental Lawyers Association (BELA), the Platform member organisation that has been fighting in the courts against the shipbreaking industry’s violation of the law since 2003.

BELA has also asked the Court to suspend the activities of 42 shipbreaking yards. In the case of 37 yards, BELA has accused the companies of operating under unsafe working conditions that led to accidents and deaths. For 7 other yards BELA has provided information on how these companies violate the requirements for their environmental clearances. BELA is gathering more evidence, so the number of yards to be closed is likely to increase further.

In March 2009, the High Court had ruled that the Government is to set up a committee to ensure the impartial supervision of the shipbreaking industry. The Court also found that the shipbreaking yards did not hold the necessary environmental clearance to operate. As a consequence, the yards were temporarily shut down. The Court demanded that the Government comply with the requirements under the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal. This included the respect for Prior Informed Consent (PIC), that is, the approval by Bangladesh of the import of end-of-life vessels to Bangladesh, the authorities blindly accept fake certificates stating that all the old ships are free of hazardous waste. The authorities never ask anyone to follow the procedure of Prior Informed Consent. The independent Committee, which according to the Court should also include non-government organisations and labour unions, has never been made functional – thus, there is no impartial supervision of the industry. BELA argues that at least 93 workers have died since the 2009 Court order. All this has passed without consequences.

Both the shipbreaking industry and the Government of Bangladesh are now asked to give account of their actions. If they fail to produce sufficient arguments, the people responsible are likely to be sentenced and yards may be closed down.

FURTHER READING

UNITED STATES OF AMERICA: The Los Angeles Times published an article about the controversial dismantling operations in Bangladesh’s shipbreaking yards, denouncing, inter alia, the employment of underage workers.

UNITED STATES OF AMERICA: Atlas Obscura, which defines itself as an online guide to the world’s wondrous and curious places, provided its readers with a general overview on the ship recycling industry. The article touches upon several shipbreaking-related aspects, such as workers’ health and safety and the use of the so-called ‘flags of convenience’ by ship owners.

INFO@SHIPBREAKINGPLATFORM.ORG
WWW.SHIPBREAKINGPLATFORM.ORG

We thank the European Commission for supporting this publication.