



## Open Letter to the European Commission: REQUEST FOR ACTION

**Immediately Remove the EU Approvals Issued to  
Ship Recycling Facilities in Aliğa**

**Dear Commissioner Jessika ROSWALL,**

We urge the European Commission to take immediate action to remove the EU approval of ship recycling facilities in Aliğa, Türkiye, under Article 23 of the EU Ship Recycling Regulation, until changes are made to align the sector with existing EU and national environmental laws, occupational health and safety standards and labour rights.

The ship recycling sector in Aliğa, including facilities approved by the EU, fails to meet environmental protection and occupational health and safety standards. More than half of EU-flagged vessels are dismantled in Aliğa. Currently, 11 of the 22 ship recycling facilities in Aliğa are EU-approved. Additionally, five facilities have applied for approval.

The European Commission has approved practices in Aliğa that would never be accepted at ship recycling facilities located in an EU Member State. What is not allowed in the EU should not be accepted elsewhere as that amounts to deplorable double standards. Years of violations related to poor hazardous waste management, unsafe working conditions, and regulatory failures to control the sector have been documented, and we would particularly like to highlight the following non-compliance of the Turkish ship recycling sector with regards to the EU Ship Recycling Regulation's requirements:

- Facilities are unlawfully **exempted from Environmental Impact Assessment (EIA)** procedures. Concerned parties have **filed an appeal** on this matter which is currently under review by the Turkish Constitutional Court.<sup>1</sup>
- Enforcement of environmental and labour laws and inspection of the sector remain deeply unsatisfactory, and concerned parties have also filed a **criminal complaint** regarding these matters upon which submitted evidence of violations has in large part relied on EU Inspection Reports.<sup>2</sup>
- Recently, it was revealed that **15.000 tonnes of hazardous waste** from the ship recycling sector have been **illegally dumped**.<sup>3</sup>
- Ships are dismantled using the **landing method, which is not practiced, nor allowed, in any EU Member State**. This technique devastates not only the coastal ecosystem but also food security and public health.
- A study conducted by TÜBİTAK (The Scientific and Technological Research Council of Türkiye) and Ege University in İzmir found that **heavy metal levels** in air, water, and soil in the region **exceed limit values** by a wide margin due to ship recycling activities.
- There is **no occupational disease surveillance system** in Türkiye. It is believed that the data do not reflect the reality. Despite these shortcomings, occupational diseases have recently been detected among workers at EU-approved facilities.
- EU inspection reports have identified multiple **violations**, including related to waste management, asbestos reporting, and preventive measures against leakages. These violations persist despite repeated findings, and also constitute violations of Turkish law as filed in the criminal complaint mentioned above. EU inspections **have furthermore not examined** wastewater systems, drainage capacities, or processes that would guarantee the control of debris generated during dismantling.

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<sup>1</sup> Constitutional Court, Application number: 2025/38719

<sup>2</sup> Aliaga chief public prosecutor's office, file number: 2025/4151

<sup>3</sup> "Announcement to the press and public" <https://www.aliaga.bel.tr/haber/basina-ve-kamuoyuna-duyuru/1502>

**We are concerned that the EU certifications legitimise ship recycling yards in Aliğa that do not comply with the EU Ship Recycling Regulation**, as outlined in the abovementioned practices, enabling shipowners—including states—to send vessels to these facilities despite ongoing violations.

Furthermore, we are deeply concerned about the European Commission’s ongoing assessment of applications from facilities conducting beaching in India. Beaching is the worst practice of ship breaking. **Neither the beaching or landing methods are accepted in the EU** as these methods make it impossible to fully contain pollutants and thus cause irreparable damage to the environment.

We oppose double standards and call on the EU to not legitimise practices in Aliğa and Alang that are prohibited in the EU.

**Our demands to the European Commission:**

- **Immediately remove** all EU approvals for facilities in Aliğa.
- **Review and update the approval procedures under the EU Ship Recycling Regulation**, raising standards exclusively to accept methods that provide full containment using built industrial platforms such as for instance dry docks.
- **Cooperate with authorities and civil society in Türkiye** to implement reforms ensuring safe, healthy and environmentally sound ship recycling practices, including **infrastructure** investments to fully control leakages.

We emphasise that coastal ecosystems are unique and irreplaceable. Pollution has no boundaries and human rights are universal. We all share a collective responsibility to prevent harm. By legitimising current ship recycling practices in Türkiye, the EU is closing its eyes to well documented violations, exporting its toxic legacy to regions incapable of managing it, and undermining the role it can play in transforming the ship recycling sector towards truly sustainable practices.

We affirm our readiness to provide full support to the European Commission and kindly request a meeting to discuss the necessary steps in more detail.

**Yours sincerely,**

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Aegean Environment  
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Aegean Environment and  
Culture Platform

**And,**

**Aegean Environment and Culture Platform (EGEÇEP)**  
**Aegean Union of City Councils**  
**Association of Public Health Specialists**

**Foça Environmental Platform (FOÇEP)**

**Foça Platform Against the Plundering of History and Nature**

**İbrahim Doğangül - Member of Aliğa Municipal Parliament**

**İzmir City Council**

**Izmir Living Spaces**

**Izmir Medical Chamber**

**İzmir Provincial Coordination Board of Union of Chambers of Turkish Engineers and Architects - representing 23 Chambers<sup>4</sup>**

**Konak City Council**

**Polen Ecology Collective**

**Turkish Medical Association**

**Turkish Thoracic Society**

**Union of Shipbuilding, Maritime Transport, Warehouse, and Freight Handling Workers (LIMTER-IS)**

**Union of Warehouse, Port, Shipyard, and Maritime Workers (DGD-SEN)**

**Workers' Platform of the Aegean**

***And supported by:***

**European Environmental Bureau:** The EEB is the largest network of environmental citizens' organisations in Europe. It represents over 190 member organisations in 41 countries, including a growing number of networks, and acts on behalf of 30 million individual members and supporters.

**NGO Shipbreaking Platform:** The NGO Shipbreaking Platform is a global coalition of environmental, human, and labor rights organizations working to promote the safe and environmentally sound recycling of end-of-life ships worldwide. With its 17 member organisations it is recognised as the main civil society advocacy group working at the EU and UN level on the issue of ship recycling.

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<sup>4</sup> Chamber of Architects of Turkey – İzmir Branch; Chamber of Civil Engineers (İMO) – İzmir Branch; Chamber of Mechanical Engineers (MMO) – İzmir Branch; Chamber of Electrical Engineers (EMO) – İzmir Branch; Chamber of Architects – İzmir Branch; Chamber of Interior Architects – İzmir Branch; Chamber of Geological Engineers (JMO) – İzmir Branch; Chamber of Geophysical Engineers – İzmir Branch; Chamber of Mining Engineers – İzmir Branch; Chamber of Forest Engineers – İzmir Branch; Chamber of Landscape Architects – İzmir Branch; Chamber of Environmental Engineers (ÇMO) – İzmir Branch; Chamber of Meteorological Engineers – İzmir Branch; Chamber of Chemical Engineers (KMO) – Aegean Regional Branch; Chamber of Agricultural Engineers (ZMO) – İzmir Branch; Chamber of Survey and Cadastre Engineers (HKMO) – İzmir Branch; Chamber of Urban Planners (ŞPO) – İzmir Branch; Chamber of Food Engineers (GMO) – İzmir Branch; Chamber of Computer Engineers – İzmir Branch; Chamber of Marine Engineering and Operations Engineers – İzmir Branch; Chamber of Naval Architects / Ship Engineers – İzmir Branch; Chamber of Textile Engineers – İzmir Branch; Chamber of Agricultural Engineers – İzmir Branch