

Feedback regarding the European Commission's initiative to update the European list of ship recycling facilities (16th edition)

August 2026

EEB welcomes the opportunity to provide input to the public consultation on the 16th European list of ship recycling facilities and would like to share its recommendations, more specifically on the proposed inclusion of two *beaching* recycling facilities, YSI Recyclers LLP and Shree Ram Vessel Scrap Pvt, located in Alang, India.

The EU cannot approve abroad what it does not authorize at home

Despite claimed improvements, both yards still rely on the beaching method where ships are dismantled directly on a tidal beach. This method is widely recognized as the cheapest and lowest standard in ship recycling and does not ensure compliance with the EU Ship Recycling Regulation's Article 13(1) which requires controlling all leakages and conducting all operations on "impermeable floors with effective drainage systems". Cutting operations can release hazardous paint, including antifouling coatings on the ship's outer hull, as well as discharged oils or chemicals. Measures implemented in secondary cutting areas do not erase the inherent flaws of beaching and its pollution risk.

Extensive environmental and toxicological research conducted over several decades has documented significant pollution associated with shipbreaking at Alang, including contamination of groundwater, coastal waters and marine sediments by heavy metals, petroleum hydrocarbons, PAHs, plastics and other hazardous substances, as well as elevated levels of particulate matter and air pollution. Because Alang is a densely concentrated industrial area where neighboring yards share the same tidal zone, coastal waters and pollution pathways, and given the weaknesses in environmental governance and monitoring, it is difficult to attribute pollution to any single yard with certainty, nor to conclude that individual yards do not contribute to the wider pollution burden.

Like the landing method used in Aliaga, Turkey, beaching is not practiced, nor allowed in EU Member States and therefore should not be considered as providing the same level of environmental protection and safety. EU-based ship recycling facilities must comply with an extensive list of legislations, such as the Water Framework Directive (2000/60/EU), the Industrial Emissions Directive (2010/75/EU), the Waste Framework Directive (2008/98/EU), etc. Because they bear the cost of strict environmental and safety standards and must invest in compliance through dry docks, drainage systems and safe working conditions, they cannot compete with beaching yards which benefit from lower standards and can offer shipowners a higher price.

Besides, while in the EU ship recycling is generally treated as a high-impact industrial or waste-related operation requiring an Environmental Impact Assessment (EIA) prior to environmental permitting, the Indian ship recycling sector is exempted from EIA and Coastal Zone Regulation notification, much like the sector in Turkey.

Approving beaching yards on the European list would create an unacceptable double standard and disadvantage yards that have invested in compliance with the strict EU standards.

Toxic colonialism

Approving Indian shipbreaking yards for inclusion on the EU list would also risk perpetuating a form of toxic colonialism, whereby the environmental and health costs associated with dismantling hazardous European ships are shifted onto workers, coastal communities and ecosystems in South-Asia. Such an approach runs counter to the underlying objective of the Basel Ban Amendment and the Waste Shipments Regulation: preventing the externalisation of environmental and safety risks associated with hazardous waste to countries where environmentally sound management cannot be adequately ensured.

End-of-life ships are a form of waste and, like all waste, should be managed in a way that efficiently recovers their value, while protecting workers, human health, the environment and the long-term economic interests of communities worldwide. The European shipping industry has relied for too long on offloading its toxic burdens onto the world's poorest communities in the Global South. By approving Indian yards, the EU would legitimize and legalize a practice that have been harming entire communities for decades.

Besides, article 2(2)(i) of the Waste Ship Regulation was intended to extend the export prohibitions for hazardous waste to ships falling under the Ship Recycling Regulations. Recital 17 explicitly states that the amendments were necessary to ensure that ships covered by the Ship Recycling Regulation which are considered waste and exported from the Union are subject to the relevant EU waste-shipment rules, and that hazardous ships exported from the EU should be recycled only in European List facilities located in Annex VII countries. Yet, the Commission is now proposing to include in the European list Indian yards that hazardous EU-flagged ships exported from the Union cannot use. Allowing some EU-flagged ships when not exported from the EU to use these facilities would contradict the EU's obligations to restrict exports of waste that have harmful environmental and health impacts in third countries. Approving beaching yards will furthermore send a signal to the rest of the world that the EU is not serious about a responsible circular economy. By allowing the breaking of European vessels in the Global South, Europe is not only exporting hazardous waste and threatening people's health in developing countries but also contradicting its own ambition to boost the domestic supply of secondary raw materials.

The EU should boost ship recycling in the EU

Ship recycling can play a crucial role in achieving a competitive circular economy in the EU and in supporting decarbonization and strategic autonomy of the steel sector. Ships represent a significant feedstock of high-quality secondary materials essential to the transformation of the steel sector. But to tap into this potential, we must safeguard and strengthen further our domestic ship recycling industry.

This requires a genuine level playing field across the European List of ship recycling facilities, alongside targeted policy and financial support for EU-based facilities to expand sustainable operations and investments in innovation and R&D.

At a time when the EU is striving to strengthen strategic autonomy, secure access to secondary raw materials and develop a competitive circular economy, exporting valuable materials and industrial capacity cannot be the direction of European policy.

Conclusion

For the reasons listed above, the European Environmental Bureau calls for the immediate withdrawal of the European Commission's proposal to include beaching yards in the 16th European list of ship recycling facilities.

Contacts

Fynn Hauschke, Senior Policy Officer Circular Economy and Waste, European Environmental Bureau, Fynn.Hauschke@eeb.org

Isabelle Radovan, Policy Officer Circular Economy and Waste, European Environmental Bureau, Isabelle.Radovan@eeb.org