



Offshore Decommissioning and Recycling: International Regulatory Overview

Luciana Passos | March 18th

Who and What is ABS?

- **Our Mission:** To serve the public interest as well as the needs of our members and clients by promoting the security of life and property and preserving the natural environment.

- Founded in 1862 by 9 U.S. marine insurance companies.
- ‘Not-For-Profit’ Classification Society.
- No owners/shareholders, ABS Board of Directors are appointed from its Membership.
- ABS Members are the owners, operators, designers and builders of ships, offshore units and associated equipment.
- ABS as a class society represents industry and helps develop standards related to:
 - Design
 - Construction
 - Operational maintenance
 - **Decommissioning**

Offshore Decommissioning: Key Considerations

- **Inevitable Process:** Aging offshore facilities and vessels require responsible decommissioning.
- **ABS Commitment:** Prioritizes environmental safety, ethical practices, and sustainable operations amid the global energy transition.
- **Safety Focus:** Ensures safety across the entire lifecycle, especially during the end-of-life phase.
- **Risks:** Aging infrastructure and structural issues can pose significant risks to crew and environment.
- **Asset Integrity:** Essential for safeguarding the environmental and personnel during decommissioning activities.

- **Basel Convention**
- **IMO Hong Kong International Convention**
- **EU Regulation on Ship Recycling (EU)**

Basel Convention

- Adopted in 1989 and is in force since May 1992.
- Number of Signatories: 53
- Number of Parties: 191

- Basel Convention enter in force to control transboundary movement of hazardous wastes and its disposal
- Prevention of the transfer of hazardous waste from developed countries to developing countries.
- Ban Amendment – OCDE Countries, EU and Liechtenstein
- Minimize the generation at source
- Environmentally sound management
- Prior Informed Consent (PIC) procedure

Basel Convention - Stakeholders

	Before the movement	During the movement	After the movement
Exporter	Notifies, obtains consents, verifies ESM capacity, minimizes waste generation	Ensures safe and properly documented transport	Receives confirmations of final disposal; re-imports in case of problems
Importer	Sets policy (prohibits/allows), reviews notification, gives consent or objection	Controls entry at the border, checks documentation	Oversees treatment; cooperates in cases of illegal traffic
Transit	Reviews and consents or objects to transit	Monitors transport within its territory	Cooperates in incidents, illegal traffic, and corrective measures

A ship-focused convention would therefore be necessary

Hong Kong Convention

- 2009 Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships

- Objective: safety and health of personnel and environment during dismantling and recycling phases of ships and offshore assets
- Adopted by IMO in May 2009
 - Not less than 15 states accepted it
 - Combined fleet more than 40% of world's gross tonnage
 - Combined ship recycling in the states over last 10 years more than 3% of their gross tonnage
- Bangladesh and Liberia accepted in Jun 2023, making 45.81% GT
- Entry into force in 26 June 2025 (24 months after requirements were met)

Flags of Member States of the Convention



Bangladesh



Belgium



Republic of the Congo



Croatia



Denmark



Estonia



France



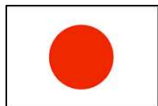
Germany



Ghana



India



Japan



Liberia



Luxembourg



Malta



Marshall Islands



Netherlands



Norway



Pakistan



Panama



Portugal



São Tomé and Príncipe



Serbia



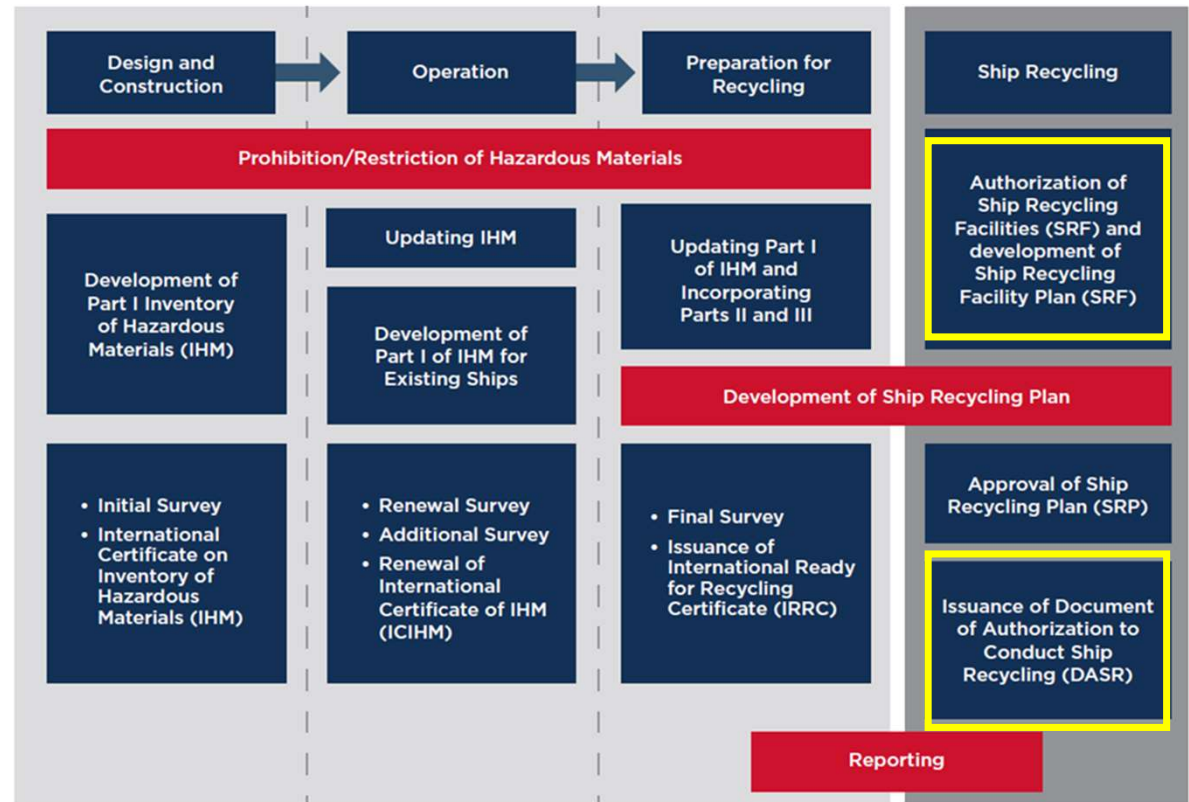
Spain



Turkey

Hong Kong Convention

- Objective: safe and environmentally sound recycling of ships
- Application:
 - Vessels (\geq) 500GT
 - Engaged in International trade
 - Flying a Flag of a Party to the Convention
 - Ship Recycling Facilities under jurisdiction of a Party to the Convention
- New vessels contracted on or after the entry into force of the Convention:
 - IHM Part I in place at the delivery
 - Initial Survey
 - International Certificate of Inventory of Hazardous Materials IHM



Hong Kong Convention – Recycling Facilities List

Ships flying the flag of a Party to the Hong Kong Convention can only be dismantled at authorized ship recycling facilities that comply with the standards in the Convention.

LIST OF SHIP RECYCLING FACILITIES (SRF) AUTHORIZED¹
Under Article 12.1 of the Hong Kong Convention

Name, address, and contact details (telephone number, email address) of the facility	Distinctive recycling company ID No.	Ship recycling capability (length/breadth/lightweight)	DASR ² issued by and valid until	Name, address and contact details (telephone number, email address) of ship recycling company, if different from SRF	Note ³
<i>Bangladesh</i>					
Shipyards Name Address Mobile Email:	Company ID number		Bangladesh Ship Recycling Board (BSRB), 29 Oct. 2030		
Shipyards Name Address Mobile Email:	Company ID number		BSRB, 29 Oct. 2030		

Source: <https://wwwcdn.imo.org/localresources/en/OurWork/Environment/Documents/Ship%20Recycling/1%20-%20LIS...>

Hong Kong Convention - Guidelines

Since the adoption of the Hong Kong Convention, IMO's Marine Environment Protection Committee (MEPC) has developed and adopted the following guidelines to assist States in the implementation and enforcement of the Convention's technical standards:

2012 Guidelines for the **Authorization of Ship Recycling Facilities**, adopted by resolution MEPC.211(63)

2011 Guidelines for the **Development of the Ship Recycling Plan**, adopted by resolution MEPC.196(62)

2012 Guidelines for **Safe and Environmentally Sound Ship Recycling**, adopted by resolution MEPC.210(63)

2023 Guidelines for the **development of the Inventory of the Hazardous Materials**, adopted by resolution MEPC.379(80)

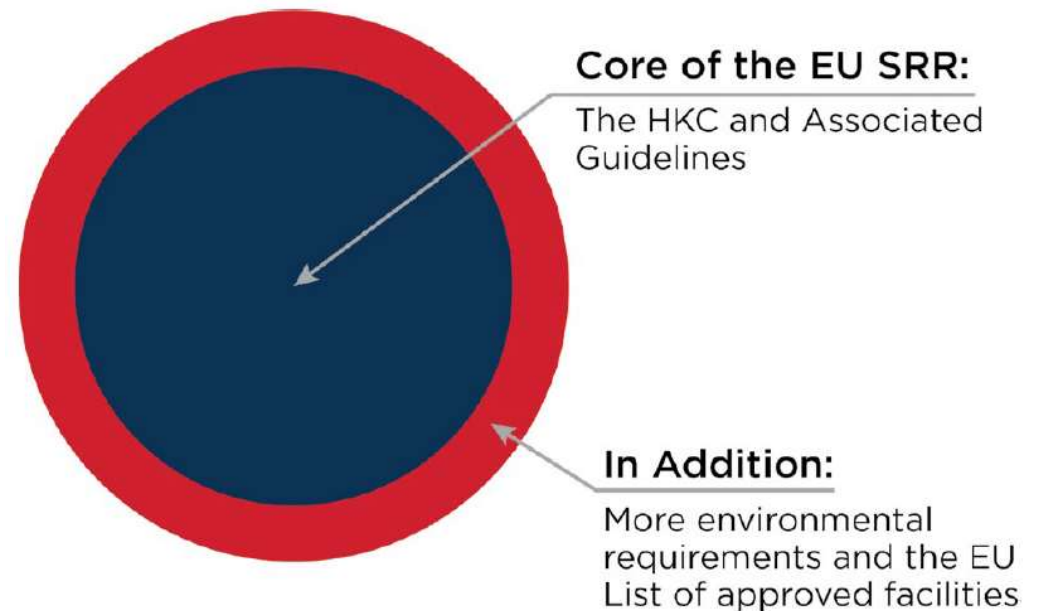
2012 Guidelines for the **survey and certification of ships under the Hong Kong Convention**, adopted by resolution MEPC.222(64)

2012 Guidelines for the **inspection of ships under the Hong Kong Convention**, adopted by resolution MEPC.223(64)

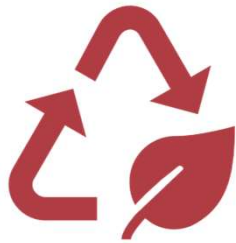
EU Ship Recycling Regulation

- **Regulation EU 1257/2013**
 - Flying the Flag of an EU member
 - Flag of a third Country calling a European Port
- **EU SRR**
 - In line with HKC
 - IHM
 - Adds 2 materials to the hazardous list (PFOS, HBCDD)

This Regulation implements the requirements of the Hong Kong Convention into EU law but also includes additional safety and environmental requirements.



EU Ship Recycling Regulation



- Existing offshore units and vessels:
 - IHM since December 2020
 - Renewal Survey every 5 years
- Recycling yards:
 - Approved by National Authorities
 - Recycling Facility Plan
 - Ship Recycling Plan
- European List of Approved Recycling Facilities*:
 - 30 yards in Europe (EU, Norway and UK)
 - 10 yards in Turkey
 - 1 yard in the USA

**list from 27-Feb-26*

Role of Class Societies in Dismantling and Recycling

Classification Societies act as Recognized Organizations (R.O.) on behalf of the Flag Administration

IHM	Recycling of Unit	Recycling Facility	Other Aspects
<ul style="list-style-type: none">- Review and approve Initial IHM (Part 1)- Confirm IHM is updated (5 years cycle)- Approves Parts 2 and 3.	<ul style="list-style-type: none">- Ship Recycling Plan approval- Continuation of Class until arrival at recycling yard- Certificate of Ready for Recycling- Verification of structural integrity and stability	<ul style="list-style-type: none">- Ship Recycling Facility Plan approval- Recycling Facility Certification- Issuance of Certificate of Final Disposal	<ul style="list-style-type: none">- Regulatory Support- Independent engineering analysis- Independent verification and certification- Audits at recycling yard to confirm compliance



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