

Contribution by Denmark on the Communication by the Commission COM(2008) 767 final
An EU strategy for better ship dismantling

Denmark is generally positive towards the Commission's communication. Denmark approves of the Commission's overall aim of improving the possibilities for ship dismantling to be carried out in an environmentally sound manner that is not linked to unhealthy working conditions in the EU and globally.

It is crucial to ensure that all EU Member States ratify the Convention as soon as possible, so that it can enter into effect quickly, and that EU Member States are not the ones blocking the process.

Denmark is sceptical, however, that a unilateral and early implementation of the Convention aimed at EU Member States' ships will lead to a global environmental benefit. Denmark is not convinced that regional EU regulation of this area is able to solve the global problem by leading to the responsible dismantling of the large ocean-going ships in a manner that is environmentally sound and not linked to unhealthy working conditions.

Denmark considers it to be of great importance that once the new Convention enters into force the double regulation of large ships in the Basel Convention and the EU Regulation on shipments of waste be abolished.

Concerning the specific proposals:

1) The Dismantling of ships

Effort should be put into ensuring that EU ships are dismantled in an environmentally sound manner not linked to unhealthy working conditions

2) Voluntary agreements

Denmark agrees with the Commission that until the Convention enters into force voluntary industry action should be encouraged by various measures, such as public campaigns on environmentally sound and socially responsible ship dismantling and guidance in the form of a list of "green" ship dismantling facilities.

In addition, campaigns and guidance should also be aimed at dismantling facilities.

3) Improved Enforcement

Denmark considers it to be imperative that a durable solution for ship dismantling be reached. Consequently solutions that ensure that ship dismantling occurs in accordance with the

requirements of the Convention should be prioritised. The EU Regulation on shipments of waste prohibits the export of hazardous wastes from the EU to non-OECD countries. Ships contain materials and substances that cause them to be classified as hazardous waste when they are to be dismantled. This is inexpedient for ships because the dismantling facilities for large ocean-going ships are located in Asia – Bangladesh, India, China and Pakistan, all countries that are not members of the OECD. For that reason it is vital that an operative transition model that can deal with the problems be created, so that it can be ensured that ships are dismantled responsibly in Asia to the benefit of the environment globally. The prohibition on the transport of hazardous wastes from the EU to non-OECD countries must be softened up, so that it does not include ships going for dismantling; conversely enforcement requirements must be established specifying that ships must be dismantled responsibly (environmentally, health- and safetywise) in accordance with the guidelines set out by the Convention on Ship Dismantling.

4) Improving the ship recycling facilities

Denmark agrees that the feasibility of developing a certification and audit scheme for ship recycling facilities worldwide should be assessed and that it should be ensured that a maximum number of ships, including ships flying the flags of Member States, go for dismantling to facilities certified and audited under this scheme. However, Denmark considers that a certification scheme cannot stand alone as it relates to national legislations that may be inadequate. It is vital that an audit scheme be linked to the specific requirements of the Convention.

Moreover, an overview of “green” dismantling facilities should be prepared as guidance for ship owners.

5) Creation of a Ship Dismantling Fund

The idea of a ship dismantling fund should be explored further. Any such system should in any event be in accordance with the principles of producer responsibility and “polluter pays.” It will furthermore be important that such a system be global and functional, so that it is ensured that all ship owners are included and that the fund’s means will go towards improving ship dismantling globally.