

**USERNAME**

swirecnco

**1. Company particulars and overall approach****1.1 - PRIMARY COMPANY NAME**

Swire Shipping

**1.3 - HEAD OFFICE LOCATION**

Singapore

**1.4 - WEBSITE**

<http://www.swireshipping.com>

**1.5 - COMPANY LOGO**

- [SS\\_logo\\_positive\\_large.jpg](#)

**1.6 - NUMBER OF SHIPS OPERATED**

130

**1.6.1 - NUMBER OF SHIPS OWNED**

80

**1.6.3 - NUMBER OF SHIPS CHARTERED**

50

**1.7 - SHIP TYPES COVERED, PLEASE SELECT ALL THAT APPLY:**

- Bulk
- Container

**1.8 - PLEASE PROVIDE A BRIEF INTRODUCTION TO YOUR COMPANY**

Our Vision is to be the leading provider of sustainable shipping solutions and our customers' partner of choice. We believe we should always seek to be ahead of legislation rather than reacting to it: that even if the socially responsible and/or environmentally "clean" way of doing something is more expensive and therefore on the face of it uneconomic, we should always, regardless of mandatory legislation, have a close look at the overall feasibility of adopting such a practice both from the point of view of general public good and enlightened self-interest.

**1.9 - WHAT IS YOUR OVERALL APPROACH / POSITIONING ON SHIP RECYCLING?**

The China Navigation Company group of companies has a Policy that all ships at the end of their economic lives will be recycled in a sustainable, safe, responsible and environmentally sound manner. If CNCo is seeking to recycle a ship it will only tender to (or via Cash buyers warranting to use) Ship Recycling Facilities ("SRF") that are currently (and expected to be for the duration of the dismantling) fully certified by a reputable, independent, competent third party as having valid and verified accreditation against the Hong Kong International Convention ("HKC") for the Safe and Environmentally Sound Recycling of Ships (whether or not yet formally adopted), and additionally if it is an EU Flagged ship, or departing on final voyage from an EU port, the SRF must by EU law be on "the white list" under the EU Ship Recycling Regulations ("SSR") 1257/2013

**2. Ship recycling policy and standards****2.1 - DOES THE COMPANY HAVE A WRITTEN POLICY ON SHIP RECYCLING FOR ITS OWNED VESSELS?**

Yes

**2.1.1 - IS IT PUBLICLY AVAILABLE?**

Yes

**2.1.2 - PLEASE PROVIDE A URL**

[http://www.swireshipping.com/index.php?option=com\\_content&view=article&id=1558&Itemid=418](http://www.swireshipping.com/index.php?option=com_content&view=article&id=1558&Itemid=418)

**2.1.3 - SINCE WHEN HAS THIS POLICY BEEN APPLIED?**

2013

**2.2 - DOES THE COMPANY KEEP RECORDS OF SHIPS WHICH HAVE BEEN SENT FOR RECYCLING?**

Yes

**2.3 - WHAT INTERNATIONAL CONVENTIONS AND PRINCIPLES DOES THE POLICY ADHERE TO?**

- Other (please specify)

**2.3.1 - PLEASE SPECIFY**

All relevant ILO conventions

**2.4 - DOES THE EU SHIP RECYCLING REGULATION APPLY TO THE COMPANY'S OWNED SHIPS?**

No

**2.5 - WHICH TOPICS DOES THE POLICY ADDRESS?**

- Environment
- Health and safety
- Labour and human rights
- Downstream facilities for managing waste and hazardous materials

**2.6 - DOES THE POLICY CONTAIN RESTRICTIONS BASED ON GEOGRAPHY AND/OR RECYCLING METHODS?**

No

**2.7 - DOES THE COMPANY HAVE A WRITTEN POLICY FOR SELECTING A YARD OR BUYER FOR RECYCLING?**

Yes

**2.7.1 - PLEASE PROVIDE FURTHER DETAILS INCLUDING A URL IF THE POLICY IS PUBLIC**

The S&P department arranges the commercial deal with a named SRF (even if using a cash buyer intermediary) based on the policy guidelines from the Sustainability Department. The Sustainability Department plays no part in the commercial selection process from the list of pre-approved SRF.

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**2.8 - DOES THE COMPANY MAKE SHIP RECYCLING PART OF THE COMPANY'S SUSTAINABILITY GOALS?**

Yes

**2.10 - DOES THE COMPANY HAVE A SHIP RECYCLING STANDARD\* (OR SIMILARLY NAMED) IN FORCE?**

Yes

**2.10.1 - FROM WHEN HAS THIS BEEN IN FORCE?**

2013

**3. Policy for selling owned vessels for further trading**

**3.1 - DOES THE COMPANY HAVE A POLICY TO PROMOTE RESPONSIBLE RECYCLING OF OWNED VESSELS SOLD FOR FURTHER TRADING?**

Yes

### 3.1.1 - PLEASE PROVIDE FURTHER DETAILS

When a ship is offered for sale at the end of its economic life by CNCo: a. If the residual value is greater than 40% above the highest current scrap value then there need be no additional contractual provisions concerning sustainable recycling of the ship; b. If the residual value is between 25% and 40% above the highest current scrap value then there shall be included in the sale contract a contractual provision that the buyer must warrant to trade the ship for the subsequent 2 calendar years or, if the absence of this, to sustainably recycle the ship according to this CNCo Sustainable Ship Recycling Policy; c. In all other cases (viz. the residual value is below 25% above the highest current scrap value) then there shall be included in the sale contract a contractual provision that the buyer must warrant the ship will be sustainably recycled according to this CNCo Sustainable Ship Recycling Policy [http://www.swireshipping.com/index.php?option=com\\_content&view=article&id=1558&Itemid=418](http://www.swireshipping.com/index.php?option=com_content&view=article&id=1558&Itemid=418)

### 3.2 - DOES THE COMPANY IMPOSE LEGALLY BINDING COVENANTS OR OFFER COMMERCIAL INCENTIVES TO THE BUYER TO ENCOURAGE RESPONSIBLE SHIP RECYCLING?

Yes

### 3.2.1 - PLEASE PROVIDE FURTHER DETAILS

See answer to 3.1

### 3.3 - DOES THE COMPANY TAKE STEPS TO PROMOTE RESPONSIBLE RECYCLING OF VESSELS CHARTERED FOR 5 YEARS AND OVER, RELEASED FOR REDEPLOYMENT OR RECYCLING?

Never

### 3.4 - DOES THE COMPANY TAKE STEPS TO PROMOTE RESPONSIBLE RECYCLING OF VESSELS CHARTERED FOR 2 YEARS AND OVER RELEASED FOR REDEPLOYMENT OR RECYCLING?

Sometimes

### 3.4.1 - PLEASE PROVIDE FURTHER DETAILS INCLUDING NUMBER OF VESSELS

See answer to 3.1

### 3.5 - DOES THE COMPANY TAKE STEPS TO PROMOTE RESPONSIBLE RECYCLING OF VESSELS OWNED THROUGH JVS?

Always

### 3.5.1 - PLEASE PROVIDE FURTHER DETAILS

the only 4 vessels that we owned through a jv were recycled (under our management) in full accordance with our policy and procedures

## 4. Ship recycling contract

### 4.1 - DOES THE COMPANY FOLLOW A STANDARD CONTRACT FOR THE SALE OF VESSELS FOR GREEN RECYCLING (E.G. RECYCLECON FROM BIMCO)?

Never

### 4.2 - DOES THE CONTRACT INCLUDE AN EXPLICIT REQUIREMENT TO RECYCLE THE VESSEL AT A SPECIFIC SHIP RECYCLING FACILITY?

Always

### 4.2.1 - PLEASE PROVIDE FURTHER DETAILS

Even when using a cash buyer intermediary, the sale for recycling contract specifies a singled named SRF

### 4.3 - DOES THE COMPANY REQUIRE ACCESS TO THE SHIP RECYCLING FACILITY DURING THE RECYCLING PROCESS FOR ANY OF THE FOLLOWING? PLEASE SELECT ANY/ALL THAT MAY APPLY

- Monitoring
- Control
- Stop-work
- Performance follow-up

### 4.4 - DOES THE CONTRACT REQUIRE COMPLIANCE WITH THE COMPANY'S WRITTEN POLICY ON SHIP RECYCLING?

Yes

**4.5 - WHAT PROTECTION IS IN PLACE FOR THE SELLER TO ENSURE THAT MILESTONES CAN BE SET, THAT ACCESS TO THE SHIP AND MONITORING CAN BE MAINTAINED THROUGHOUT THE SHIP RECYCLING PROCESS?**

The award of the sale for recycling of a CNCo vessel at the end of its economic life to a cash buyer and/or the SRF itself directly shall include as a minimum, but not limited to, the following clauses: a. CNCo will provide, at its sole cost and responsibility, both an HKC Compliance Monitoring Team ("CMT") consisting of personnel equivalent to such as at Master level, 2/E level and Bosun level, together with an auditor from a reputable, independent, competent third party, to work with the SRF management to close the gaps between the Ship Recycling Management Plan of the SRF ("SRFP") and reality, and establish best SRF practice building on, and exceeding where feasible, the HKC; b. The CMT and 3rd Party Auditor will be employed by CNCo HOF through contracts with relevant 3rd parties. These personnel will act as Technical Advisers to the SRF Management, and will expressly have no authority to instruct any SRF personnel to start, continue, or stop any work practices, except as explicitly provided below; c. It will be agreed between the SRF and CNCo that all the personnel of CNCo, including the CMT, RecRep and contracted auditor, will have the authority and responsibility to order all work to be stopped immediately on the recycling operation should they become aware of any work practices or omissions that have the potential to cause imminent or immediate harm to a) the health and safety of the workers, b) the environment. The stop work order will remain in place until the cause has been identified and remedied or rectified to the satisfaction of CNCo; d. It will be agreed between the SRF and CNCo that all the personnel of CNCo, including the RecRep, CMT and any contracted auditor, will have the authority and responsibility to request a meeting with the SRF Management should they become aware of any work practices or omissions that, whilst they may not have the potential to cause immediate harm to people of the environment, but they are in contravention to the Ship Recycling Plan for the specific vessel in question ("SSRP") or SRFP or the HKC. The meeting with management will occur as soon as possible and recommend systems, procedures and/or practices such as will remedy or rectify the compliance shortfall to the satisfaction of CNCo; e. The SRF (and CMT) will provide a weekly sustainable recycling progress report to the GM - SD, from the time of beaching to the time of obtaining a Certificate of Completion of Recycling from the appropriate regulatory body;

**5. Inventory of Hazardous Materials (IHM) and Ship Recycling Documentation**

**5.1 - DOES THE COMPANY HAVE A SHIP RECYCLING PLAN FOR EACH VESSEL?**

Yes

**5.2 - DOES THE COMPANY PROVIDE THE BUYER OR SHIP RECYCLER WITH A CLASS APPROVED IHM, AT THE TIME OF FINALISING THE SHIP RECYCLING CONTRACT?**

Always

**5.3 - DOES THE COMPANY PROVIDE ALL RELEVANT SHIP CERTIFICATES, PLANS, PROCEDURES AND DOCUMENTS, TO ENABLE THE YARDS TO FOLLOW APPLICABLE SHIP RECYCLING GUIDELINES (AND THE RELEVANT STANDARDS FROM QUESTION 2.2. THAT THE COMPANY IS ALIGNED TO)?**

Always

**5.4 - DOES THE COMPANY HAVE SPECIFIC REQUIREMENTS FOR HANDLING HAZARDOUS MATERIALS AS LISTED IN THE STOCKHOLM CONVENTION?**

No

**6. Implementation of the ship recycling policy and standard**

**6.1 - DOES THE COMPANY REQUIRE THE SHIP RECYCLING FACILITY TO HAVE A HONG KONG CONVENTION STATEMENT OF COMPLIANCE ISSUED BY A CLASSIFICATION SOCIETY?**

Always

**6.1.1 - PLEASE PROVIDE FURTHER DETAILS**

If CNCo is seeking to recycle a ship it will only tender to (or via Cash buyers warranting to use) Ship Recycling Facilities ("SRF") that are currently (and expected to be for the duration of the dismantling) fully certified by a reputable, independent, competent third party as having valid and verified accreditation against the Hong Kong International Convention ("HKC") for the Safe and Environmentally Sound Recycling of Ships (whether or not yet

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**6.2 - DOES THE COMPANY CARRY OUT ADDITIONAL AUDITS TO VERIFY COMPLIANCE PRIOR TO RECYCLING?**

Always

**6.2.1 - PLEASE PROVIDE FURTHER DETAILS**

NCo's RecRep will undertake an on-site audit against the Sustainable Shipping Initiative Responsible Ship Recycling Standard ("SSI RSRS") of any/all successfully tendering SRF, accompanied by a reputable, independent, competent third party

**6.3 - DOES THE COMPANY MONITOR YARD COMPLIANCE DURING THE RECYCLING PROCESS?**

Always

**6.3.1 - PLEASE DESCRIBE HOW THE MONITORING TAKES PLACE (PLEASE SELECT ANY/ALL THAT MAY APPLY). THROUGH:**

- Spot checks
- Ongoing supervision
- Company representative on-site

**6.3.2 - PLEASE DESCRIBE WHAT TOPICS THE MONITORING ADDRESSES (PLEASE SELECT ANY/ALL THAT MAY APPLY)**

- Environment
- Health and Safety
- Labour and Human Rights
- Sub-contractors
- Downstream facilities for managing waste and hazardous materials

**6.4 - DOES THE COMPANY HAVE THE CONTRACTUAL RIGHT TO STOP WORK AT THE FACILITY, IN CASE OF UNSAFE OPERATIONS OR OTHER NON-COMPLIANCES?**

Always

**6.5 - DOES THE COMPANY REQUIRE FACILITIES TO PROVIDE A PROCESS WHEREBY YARD WORKERS CAN VOICE AND RESOLVE CONCERNS AND GRIEVANCES REGARDING ALL WORKPLACE ISSUES WITHOUT FEAR OF RETRIBUTION?**

Never

**6.6 - DOES THE COMPANY REQUIRE FACILITIES TO ENABLE YARD WORKERS TO ASSOCIATE AND BARGAIN COLLECTIVELY?**

Never