Ship Recycling Transparency Initiative

Shipowner Disclosure Questionnaire

This version of the SRTI shipowner disclosure questionnaire is made available for download to facilitate sharing and reviewing data across departments. You can also use the ‘Save and Continue Later’ function on the online form to save a draft disclosure and share a link to review with a colleague or supervisor.

If you have any questions about the form or becoming an SRTI signatory, please reach out to the Secretariat via email at srti@sustainableshipping.org

1. **Company particulars and overall approach**
   1. Number of ships operated
      1. Number of ships owned
      2. Total DWT of ships owned
      3. Number of ships chartered
      4. Total DWT of ships chartered
   2. Ship types covered, please select all that apply:

Bulk

Container

Cruise

Fishing

Gas carrier

General cargo

Livestock

OSVs

Other

Passenger

RORO

Tanker

Vehicle carrier

* 1. Please provide a brief introduction to your company
  2. What is your overall approach / positioning on ship recycling? (Please summarise your overall approach / philosophy based on what you say publicly)

1. **Ship recycling policy and standards**
   1. Does the company have a written policy[[1]](#footnote-1) on ship recycling for its owned vessels?
      1. If YES, is it publicly available?
      2. If YES, please provide a URL
      3. Since when has this policy been applied?
      4. How many ships does the policy apply to?
      5. Does the company keep records of ships which have been sent for recycling?
         1. Please provide further details including a URL if the records are public
   2. What international conventions and principles does the policy adhere to? (Please tick any/all that may apply)

[Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal (1992)](http://www.basel.int/TheConvention/Overview/TextoftheConvention/tabid/1275/Default.aspx)

[EU Ship Recycling Regulation (2013)](https://ec.europa.eu/environment/waste/ships/)

[Hong Kong International Convention for the safe and environmentally sound recycling of ships (2009)](http://www.imo.org/en/OurWork/Environment/ShipRecycling/Pages/Default.aspx)

[ISO 30000:2009 Ships and marine technology - Ship recycling management systems (2009)](https://www.iso.org/standard/51244.html)

[OECD Guidelines for Multinational Enterprises (2011)](http://mneguidelines.oecd.org/mneguidelines/)

[Safety and health in shipbreaking: Guidelines for Asian countries and Turkey (2004)](https://www.ilo.org/safework/info/standards-and-instruments/codes/WCMS_107689/lang--en/index.htm)

[Stockholm Convention on Persistent Organic Pollutants (2001)](http://www.pops.int/TheConvention/Overview/tabid/3351/Default.aspx)

[The Recycling of Ships Act (2019)](http://egazette.nic.in/WriteReadData/2019/214694.pdf)

[UN Global Compact](https://www.unglobalcompact.org/what-is-gc/mission/principles)

[UN Guiding Principles on Business and Human Rights (2011)](https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf)

Other (Please comment)

* 1. Does the EU Ship Recycling Regulation apply to the company’s owned ships?
     1. If YES, how many ships does the regulation apply to?

>75%

51-75%

25-50%

<25%

None

* 1. Which topics does the policy address? (Please tick any/all that may apply)

Environment

Health and safety

Labour and human rights

Anti-corruption

Sub-contractors

Downstream facilities for managing waste and hazardous materials

Other (Please comment)

* 1. Does the policy contain restrictions based on geography and/or recycling methods?
     1. Please provide further details
  2. Does the company have a written policy for selecting a yard or buyer for recycling?
     1. Please provide further details including a URL if the policy is public
  3. Does the company make ship recycling part of the company’s sustainability goals?
  4. Does the company include ship recycling information in its sustainability reporting?
     1. If YES, Is this information verified by a third party?
     2. If YES, Please provide further details include a URL to the latest sustainability report
  5. Does the company have a ship recycling standard[[2]](#footnote-2) (or similarly named) in force?
     1. If YES, from when has this been in force?

1. **Policy for selling owned vessels for further trading**
   1. Does the company have a policy to promote responsible recycling of owned vessels sold for further trading?
      1. If YES, please provide further details
   2. Does the company impose legally binding covenants or offer commercial incentives to the buyer to encourage responsible ship recycling?
      1. If YES, please provide further details
   3. Does the company take steps to promote responsible recycling of vessels chartered for 5 years and over, released for redeployment or recycling?
      1. Please provide further details including number of vessels
   4. Does the company take steps to promote responsible recycling of vessels chartered for 2 years and over released for redeployment or recycling?
      1. Please provide further details including number of vessels
   5. Does the company take steps to promote responsible recycling of vessels owned through JVs?
      1. Please provide further details
2. **Ship recycling contract**
   1. Does the company follow a Standard Contract for the sale of vessels for green recycling (e.g. RECYCLECON from BIMCO)?
      1. If an industry standard contract template used, please specify
   2. Does the contract include an explicit requirement for recycle the vessel at a specific ship recycling facility?
      1. Please provide further details
   3. Does the company require access to the ship recycling facility during the recycling for any of the following? (If YES, Please tick any/all that may apply)

Monitoring

Control

Stop-work

Performance follow-up

* 1. Does the contract require compliance with the company’s written policy on ship recycling?
  2. 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?

1. **Inventory of Hazardous Materials (IHM) and Ship Recycling Documentation**
   1. Does the company have a Ship Recycling Plan for each vessel?
   2. Does the company provide the buyer or ship recycler with a Class approved IHM, at the time of finalising the ship recycling contract?
   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)?
   4. Does the company have specific requirements for handling hazardous materials as listed in The Stockholm Convention?
      1. Please provide further details about the specific requirements
   5. If owning or operating tankers, does the company have specific requirements to ensure that tankers arrive at the Ship Recycling Facility in a condition ready for certification as Safe-for-entry or Safe-for-hot-work?
      1. Please provide further details
2. **Implementation of the ship recycling policy and standard**
   1. Does the company require the ship recycling facility to have a Hong Kong Convention statement of compliance issued by a Classification Society?
      1. Please provide further details
   2. Does the company carry out additional audits to verify compliance prior to recycling?
      1. Please provide further details
   3. Does the company monitor yard compliance during the recycling process?
      1. Please describe how the monitoring takes place (Please tick any/all that may apply). Through:

Spot checks

Ongoing supervision

On-site follow-up

Company representative on-site

Other (Please specify)

* + 1. Please describe what topics the monitoring addresses (Please tick any/all that may apply)

Environment

Health and Safety

Labour and Human Rights

Anti-corruption

Sub-contractors

Downstream facilities for managing waste and hazardous materials

Other (Please specify)

* 1. Does the company have the contractual right to stop work at the facility, in case of unsafe operations or other non-compliances?
  2. 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?
     1. Please provide further details
  3. Does the company require facilities to enable yard workers to associate and bargain collectively?
     1. Please provide further details

1. **Other comments**
   1. If there has not been sufficient opportunity to cover the overview of the company to ship recycling in this document, please use this area to provide further information

1. A policy is defined here as a statement of intent on the approach taken to ship recycling [↑](#footnote-ref-1)
2. A standard is defined here as an internal agreed document, such as a Standard Operating Procedure or manual, against which compliance with the company’s ship recycling policy can be measured [↑](#footnote-ref-2)