



Environment

## Hong Kong Convention Covers Environment Protection and Worker Safety: Q&A With Kiran Thorat, GMS

Safety and sustainability in ship recycling depend on four key areas: infrastructure, continuous training, ongoing monitoring, and transparent reporting.



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📅 about 9 hours ago



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With IMO targets of net-zero on the horizon, the global shipping industry is pursuing ambitious carbon emissions reduction efforts, from adopting green fuel to recycling. Ship recycling is one of the climate actions that promotes resource efficiency and minimises waste.

It is all about dismantling end-of-life ships and salvaging their reusable materials. To know about the ship recycling industry and the Hong Kong Convention (HKC), *SeaNews* reached out to **Kiran Thorat**, a trader at **Global Marketing Systems (GMS)** – the world's largest buyer of ships and offshore assets for recycling.

**What motivated GMS to align so closely with the Hong Kong Convention (HKC), and how does it fit into your broader mission of sustainable ship recycling?**

At GMS, we support global, practical, and enforceable standards in ship recycling. The EU Ship Recycling Regulation (EUSRR) is a regional law that applies only to EU-flagged ships. The Basel Convention treats end-of-life ships as hazardous waste but does not address the operational or safety realities of ship recycling. Neither framework offers a complete, comprehensive, and universal solution.

The Hong Kong Convention (HKC), developed by the International Maritime Organization (IMO), is the only global framework that covers environmental protection, worker safety, and recycling infrastructure. It was built specifically for ship recycling, with input from maritime and recycling experts. That's why GMS followed it from the start. It is practical, focused on industry needs, recognized internationally, and relevant to all assets, regardless of type, flag, or port.

**How has the Convention's implementation changed the ship recycling industry from GMS's perspective?**

Before the Hong Kong Convention, the ship recycling industry had no common standard. Each yard operated differently, without global standards on safety measures, infrastructure, and systems for managing hazardous waste.

The Convention introduced clear requirements. All ships must now carry an Inventory of Hazardous Materials (IHM), including Part I (materials on board), Part II (wastes in tanks

and pipelines), and Part III (residues in machinery). This helps identify and locate all hazardous materials before recycling begins, including their nature and quantity.

Yards must have a Ship Recycling Facility Plan (SRFP) that outlines their layout, equipment, safety systems, and waste handling procedures. By combining the Inventory of Hazardous Materials (IHM) and the SRFP, a Ship Recycling Plan (SRP) is created. This plan explains how each specific ship will be dismantled safely at a specific yard. Finally, the International Ready for Recycling Certificate (IRRC) confirms that a vessel meets all these standards before its final voyage.

These processes did not exist in a unified way before the Convention. HKC has brought structure, improved safety, better infrastructure, and more transparency across the entire recycling chain.

### **How does the Hong Kong Convention compare to the EU Ship Recycling Regulation or the Basel Convention in terms of scope and impact?**

The EU Ship Recycling Regulation (EUSRR) applies only to EU-flagged vessels and permits recycling only at yards listed on the EU-approved list. This system establishes a predetermined preference for certain regional yards, excluding others irrespective of their actual standards. In fact, several yards in South Asia meet higher safety and environmental benchmarks than some included on the EU list. The approach also reflects policy decisions that go beyond technical criteria.

The Basel Convention treats end-of-life ships as hazardous waste, but it was not designed for ships. It does not consider the operational aspects of ship recycling, such as yard infrastructure, worker safety, or how ships are dismantled.

The Hong Kong Convention is different. It was developed by the International Maritime Organization (IMO) specifically for ship recycling. It sets global standards that apply regardless of flag or location. It focuses on safety, environmental protection, labour training, and proper management of hazardous materials. That makes it the only comprehensive and internationally recognized framework for sustainable ship recycling.

### **How does GMS balance commercial interests with the environmental and safety requirements of the Hong Kong Convention?**

For GMS, the Hong Kong Convention is the global standard for safe and environmentally sound ship recycling. With over 33 years of experience and more than 5,500 ships recycled from major owners worldwide, we understand both the commercial and compliance aspects of the industry.

We ensure that vessels sold through GMS are recycled only at yards that are committed to the processes and principles of the Hong Kong Convention. We actively support yards in upgrading their infrastructure, improving safety practices, and obtaining a Statement of Compliance with the Convention. In many cases, we have directly helped yards meet HKC requirements through technical guidance and ongoing monitoring.

GMS works only with facilities that either meet the standards of the Convention or are clearly progressing toward full compliance, ensuring sustainable and responsible recycling without compromising safety or environmental protection.

At GMS, we firmly believe that sustainability must have a commercial focus. A process cannot be considered sustainable or viable if any party involved suffers a loss in value. With a strong presence across all major recycling destinations and services provided at every recycling yard, GMS ensures the best commercial outcomes for owners choosing to recycle their vessels.

**Explain the process of creating a Ship Recycling Plan (SRP) for a specific vessel, and how GMS ensures it aligns with HKC guidelines.**

Under the Hong Kong Convention (HKC), a Ship Recycling Plan (SRP) is a mandatory document that outlines how a specific vessel will be dismantled safely and in line with environmental and safety standards. It must be based on the vessel's Inventory of Hazardous Materials (IHM), which includes:

Part I: Hazardous materials present in the ship's structure

Part II: Operationally generated waste (e.g. sludge, bilge water)

Part III: Stores and equipment containing hazardous materials

These documents are the ship owner's responsibility and must be MEPC-compliant (as per IMO MEPC.269(68) guidelines). They allow yards to clearly identify and safely manage all

hazardous materials on board.

If the IHM is not already available, our Sustainable Ship and Offshore Recycling Program (SSORP) supports shipowners by providing LRQA-verified surveyors who board the vessel and prepare IHM Parts I, II, and III. SSORP also verifies that the yard has a valid Ship Recycling Facility Plan (SRFP) and ensures that it meets HKC standards.

Throughout the process, our SSORP team provides regular compliance reports, photo evidence, and carbon footprint data to shipowners. This ensures full transparency and traceability, which is why SSORP has been trusted by many leading global shipping companies.

**What tangible improvements have you seen in worker safety and environmental practices at yards GMS works with since the Convention's adoption?**

Even before the Hong Kong Convention entered into force, many of the yards GMS worked with had already started following its principles voluntarily. Worker training programs were already being run by both government bodies and the yards themselves.

Through our Sustainable Ship and Offshore Recycling Program (SSORP), GMS has played an active role in improving safety and environmental practices. We have coordinated visits from classification societies, shipowners, and government representatives, and provided regular monitoring and reporting on behalf of shipowners to ensure compliance with international standards.

We also provide technical support to help yards in the Indian subcontinent achieve a Statement of Compliance with the Hong Kong Convention. Over the years, we've seen major improvements: safety has become a structured process, with workers receiving proper training, access to personal protective equipment, and regular safety drills.

Since 2015, labor colonies with better living conditions, sanitation, and medical care have become the standard in many yards. These changes, supported by our programs, reflect the progress made toward safer and more responsible ship recycling.

**How do you see the Hong Kong Convention influencing the global ship recycling market, particularly in non-OECD countries where beaching is prevalent?**

The Hong Kong Convention has played a major role in changing global perceptions around ship recycling, especially in countries where the beaching method is used. With the right infrastructure in place, beaching has proven to be one of the most effective and environmentally sound methods for recycling end-of-life vessels.

In recent years, significant investments have been made in the Indian subcontinent. Yards now operate with impermeable floors, heavy-duty cranes, dedicated waste management systems, medical facilities, anti-pollution methods, and strict safety protocols. These upgrades have brought the region in line with international expectations.

India currently has over 110 yards certified for compliance with the Hong Kong Convention. Bangladesh has more than a dozen compliant yards, with many others actively working toward certification. Pakistan is also making infrastructure improvements to meet HKC requirements.

This progress shows that responsible recycling is not limited by geography. With proper systems in place, non-OECD countries can meet, and in many cases exceed, global standards for safety and environmental protection.

**What do you see as the next steps for the ship recycling industry to further improve safety and sustainability?**

Safety and sustainability in ship recycling depend on four key areas: infrastructure, continuous training, ongoing monitoring, and transparent reporting. Programs like our Sustainable Ship and Offshore Recycling Program (SSORP) are already playing a major role. SSORP has provided free training to over 10,000 yard workers across the Indian subcontinent, supporting long-term improvements from the ground up.

SSORP also ensures regular compliance checks, auditing, and detailed reporting for shipowners, helping maintain high standards throughout the recycling process.

The next step is to bring more recycling yards up to Hong Kong Convention (HKC) standards, especially in regions like Pakistan and Bangladesh, where positive developments are already underway with an increase in HKC-compliant capacity.

At the same time, it's important that facilities outside the Indian subcontinent also align with HKC. Expanding the network of compliant yards globally, particularly near key end-of-life



vessel routes, will benefit both the environment and local economies, making ship recycling more efficient and responsible worldwide.

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