



17 September 2026

Open letter

To the Environment and Transport Ministers of the European Union

Dear Ministers,

BIMCO, the Cruise Lines International Association (CLIA), European Shipowners | ECSA, the International Chamber of Shipping (ICS), INTERCARGO, INTERFERRY, INTERTANKO, and the World Shipping Council (WSC) call on EU Member States to deliver a positive opinion on the European Commission's proposal to add two Indian ship recycling facilities to the updated European List of Ship Recycling Facilities.

This proposed inclusion of the two Indian yards reflects years of substantial investment and effort, following the adoption of the Hong Kong Convention (HKC) in 2009. Inclusion on the European List should be determined solely on whether a facility meets the EU Ship Recycling Regulation (EU SRR) safety and environmental requirements, based on objective assessment and inspection. The yards concerned have made considerable capital investments to upgrade their infrastructure, safety systems, and environmental management to meet the HKC and EU SRR standards. These efforts embody the very purpose of the EU SRR: to reduce disparities between operators in the EU, in OECD and in relevant third countries in terms of workplace health and safety and environmental standards, in support of the globally applicable Convention.

In every previous edition of the European List, Member States have endorsed the requirements set out in the EU SRR and its Technical Guidance Note. The two Indian yards meet those same requirements, as demonstrated in the inspection reports ([publicly available](#)). Declining to approve facilities that objectively meet the standards Member States have themselves agreed would be inconsistent and would undermine the recognition and credibility of the EU's own legislation.

Regulatory certainty is needed, and so is recycling capacity. With industry estimates¹ pointing to a significant increase in the number of vessels reaching the end of their operational life, the inclusion of the two Indian facilities is an important step towards further securing sufficient compliant capacity on the European List.

The EU Industrial Maritime Strategy also recognises this. The Strategy seeks to expand domestic EU capacity by making recycling more cost-efficient, while pursuing an international level playing field by aligning the EU and global standards.

¹ [News & insights, Ship Recycling \(bimco.org\)](#)

We call on the Member States to base their decisions on facts and evidence and the requirements of the EU SRR. Non-OECD yards that meet the EU SRR's safety and environmental requirements should be admitted to the EU list.

We remain at your disposal should you have any questions.

Best regards,

David Loosley, Secretary General and CEO, **BIMCO**

Bud Darr, President and CEO, **Cruise Lines International Association (CLIA)**

Sotiris Raptis, Secretary General, **European Shipowners | ECSA**

Thomas A. Kazakos, Secretary General, **International Chamber of Shipping (ICS)**

Kostas G. Gkonis, Director and Secretary General, **INTERCARGO**

Mike Corrigan, CEO, **INTERFERRY**

Tim Wilkins, Managing Director, **INTERTANKO**

Joe Kramek, President and CEO, **World Shipping Council (WSC)**