

2 Survey questionnaire Evaluation of Regulation (EU) No 1257/2013 on ship recycling (SRR)

2.1 Introduction

2.1.1 Objective of the study

European ship owners possess around 40% of the world fleet. Many of these ships are being dismantled in South Asia, under conditions that are often harmful to workers' health and the environment. Since 31 December 2018, the Ship Recycling Regulation requires all large sea-going ships sailing under an EU Member State flag to use an approved ship recycling facility included in the European List of ship recycling facilities. Facilities included in the List do recycle the ship in a safe manner and an environmentally friendly way. The Ship Recycling Regulation also has the objective to ensure the proper management of hazardous materials on ships and to facilitate the ratification of the Hong Kong Convention, which provides a global action on ship recycling.

2.1.2 Evaluation

The European Commission is now evaluating the Regulation and therefore collecting insights into how the Regulation is functioning and which elements of it should be improved. The evaluation is also looking into how consistent the Regulation is with the EU's wider policy objectives, including those introduced under the European Green Deal, the circular economy and the zero pollution action plans. Ecorys, in a consortium with Grimaldi, Ramboll and ABS, has selected to undertake a support study to assist the Commission in the evaluation of the Regulation. From 2 to 30 June 2022, the Commission conducted a Call for Evidence, where it invited all interested parties to submit their initial feedback to the Evaluation. With this targeted questionnaire, the Commission is continuing to gather feedback from all interested parties.

2.1.3 Financial instrument

In 2016, a study commissioned by the Commission concluded that a financial instrument, identified in the form of a Ship Recycling

License, would stimulate safe and environmentally sound recycling. The license would be required for entry to EU ports, connected with fees that lead to capital accumulation that can cover the revenue gap between sound and unsound recycling. The financial instrument in the form of a Ship Recycling License assumes that the full capital amount would be paid to the ultimate owner of the ship on the condition that the ship was sent to an EU-listed ship recycling facility. If it is not the case, the accrued capital would be forfeited as a penalty and transferred to a fund to serve the objectives of the Regulation. In addition to questions related to the evaluation of the existing legislation, the questionnaire therefore also includes questions on a possible future financial instrument. You can save your answers as drafts and finish the survey later.

2.2 This survey-questionnaire

In this survey-questionnaire we want to gather information for the evaluation and the possible future financial instrument.

The survey-questionnaire is organized as follows:

- Section 1 provides the introduction;
- Section 2 addresses identification questions;
- Section 3 focuses on the evaluation;
- Section 4 focuses on the potential financial instrument;
- Section 5 closure.

2.3 Use of your input

Your responses will be used to help us to further develop the content of the support study. The study team will not share the collected information with anyone outside the support study team. Your information will be anonymized with regards to presenting the results. For more information on our data privacy policy, please click on the Privacy notice.

If you have any questions, please do not hesitate to contact us on Ship-recycling-regulation@ecorys.com.

3 Identification questions

We would like to ask you some general questions on who you represent

*** Question 1: What is the name of your organization/institution?**

International Ship Recycling Association

Question 2: Which country (countries) are you located in?

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czechia
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Iceland
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands**
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- Norway
- Serbia

- Switzerland
- UK
- Other

Question 3: Which country (countries) do you operate in?

- Austria
- X Belgium
- Bulgaria
- Croatia
- Cyprus
- Czechia
- X Denmark
- Estonia
- Finland
- X France
- Germany
- Greece
- Hungary
- Iceland
- Ireland
- X Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- X Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- X Spain
- Sweden
- X Norway
- Serbia
- Switzerland
- UK
- X Other (Turkey, China)

These are the countries where our members operate.

Question 4: Please confirm in what capacity you are responding

- X Representing my organization

- Personal view and opinion

*** Question 5: Please indicate to which category of stakeholder you belong. Please carefully consider this category. The response to this question is necessary to reroute you to the questions addressed to your category. It is possible to indicate multiple stakeholder groups, but please indicate the main group if possible.**

- Member State and third State in their capacity as Flag State
- Member State in their capacity as Port State
- Member States' environmental administrations monitoring yards recycling ships
- Ship owner
- Cash buyer
- Shipbroker
- Recycling yard
- Steel industry
- Classification society
- Bank financing the shipping sector
- Maritime Law office
- X EU and international association
- International organization
- Academic / research institute / civil society
- Other, please specify

Question 5a: If a ship owner, under which flag are you flying?

- EU
- Non-EU
- Both EU and non-EU

Question 5a: Is the yard part of the European list of ship recycling facilities?

- Yes
- No

If other, please specify

[open text box]

The International Ship Recycling Association (ISRA) promotes sound and safe ship recycling on a global level. ISRA members operate their ship recycling facilities in conformity with the high EU-SRR standards. ISRA Members invested substantially to meet these standards and are confronted with an unequal level playing field.

ISRA is active to eliminate this inequality through intervening by - amongst other activities- (inter)national organizations.

4 Evaluation

The Ship Recycling Regulation (SRR) was adopted in 2013. The Regulation is effectively applied since 2018 (with some provisions applied earlier). The Commission needs to check how the Regulation is functioning in practice and whether the Regulation in its current form is still 'fit for purpose.' In other words, is there a need to amend the Regulation? The following questions relate to this topic.

Question 6: Compared to what would have happened in the absence of the Ship Recycling Regulation, to what extent has the Ship Recycling Regulation contributed to preventing and reducing the adverse effects of ship recycling on human health?

NB: This question should be addressed to:

Member State and third State in their capacity as Flag State

Member State in their capacity as Port State

Member States' environmental administrations monitoring yards recycling ships

Ship owner

Cash buyer

Shipbroker

Recycling yard

Classification society

EU and international association

International organization

Academic / research institute / civil society

- To a large extent
- To some extent
- It had no effect
- It had a negative effect
- I do not know

Please explain your answer

The wording of article 13 in general *to protect human health* is an improvement and seems sufficient, with exception of the following:

Article 13 paragraph 1 sub (j) lacks a mandatory period for establishment and submission of the records and information meant. ISRA recommends to add that these actions must take place over a certain time period, for instance once every year.

Supervision by Member States (“MS”) on the compliance of the requirements of article 13 and other conditions concerning human health must be stricter: for the EU based facilities article 14 paragraph 4 lacks a midterm mandatory review of control by MS (comparable with the wording of article 15 paragraph 4 in conjunction with article 15 paragraph 6 for facilities in third countries)

Question 7: Are you aware of any data source supporting your answer?

- Yes
- No
- I do not know

If yes, please specify which

ISRA informed a number of Member States and the European Commission on a case-by-case basis through formal letters of the (alleged) infringements of the EU SRR when it comes to the illegal export of EU-flagged ships.

Question 8: How many accidents have occurred at your yard, in which an employee was injured?

NB: This question should be addressed to:
[Recycling yard](#)

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Number of accidents										

Question 9: Compared to what would have happened in the absence of the Ship Recycling Regulation, to what extent has the Ship Recycling Regulation contributed to preventing and reducing the adverse effects of ship recycling on the environment?

NB: This question should be addressed to:

Member State and third State in their capacity as Flag State

Member State in their capacity as Port State

Member States' environmental administrations monitoring yards recycling ships

Ship owner

Cash buyer

Shipbroker

Recycling yard

Classification society

EU and international association

International organization

Academic / research institute / civil society

- To a large extent
- To some extent
- It had no effect
- It had a negative effect
- I do not know

Please explain your answer

The wording of article 13 in general *to protect environment* seems sufficient, with exception of the following:

The wording in paragraph 1 subsection (c) ...it operates from built structures...in conjunction with subsection (f) ...control of any leakage, in particular in intertidal zones... does not safeguard and prevent environmental damage when recycling is practiced in intertidal zones, such as is the case in substandard tidal operations.

It should state that recycling of ships must take place in proper designed, constructed and build structures not influenced by tides or the like whatsoever so that environment (water and or land) will not be damaged in no sense by the recycling activities.

Supervision by MS on the compliance of the requirements of article 13 and other conditions concerning environment must be stricter: for the EU based facilities article 14 paragraph 4 lacks a midterm mandatory review of control by MS (comparable with the wording of article 15 paragraph 4 in conjunction with article 15 paragraph 6 for facilities in third countries)".

Question 10: Are you aware of any data source supporting your answer?

- Yes
- No
- I do not know

If yes, please specify which

Question 11: Compared to what would have happened in the absence of the Ship Recycling Regulation, to what extent has the SRR contributed to reduce disparities (environmental and in health & safety) standards between recycling facilities in the Union and in third countries?

NB: This question should be addressed to:

Member State and third State in their capacity as Flag State
Member State in their capacity as Port State
Member States' environmental administrations monitoring yards recycling ships
Ship owner
Cash buyer
Shipbroker
Recycling yard
Classification society
EU and international association
International organization
Academic / research institute / civil society

- To a large extent
- To some extent
- It had no effect
- It had a negative effect
- I do not know

Please explain your answer

The EU SRR has contributed to uniformity for all facilities suitable for listing.

Question 12: At what capacity is your recycling yard operating (%)?

NB: This question should be addressed to:

Recycling yard

	2016	2017	2018	2019	2020	2021	2022	Open field to elaborate
At what capacity is your recycling yard operating (%)?								

Question 13: To what extent do you agree that the European list of ship recycling facilities has sufficient recycling capacity to cover the current needs?

NB: This question should be addressed to:

Member States' environmental administrations monitoring yards recycling ships

Recycling yard

EU and international association

Academic / research institute / civil society

Strongly agree

Somewhat agree

Neutral

Somewhat disagree

Strongly disagree

No opinion / don't know

Please explain your answer

The capacity issue has been on the table several times on various occasions. Over and over ISRA concluded that the capacity has always been more than sufficient, also for the largest vessels. It has been argued several times by ECSA and BIMCO that a small number of large ship recycling facilities should not be on the EU list because they have not recycled any ship and use their facilities for ship repair. Even when disregarding the capacity of these facilities, the total remaining capacity on the EU list is well above the current demand. The fact that many EU-listed yards are working well below their maximum capacity proves this point.

When the profit for recycling for these repair yards exceeds/equals the profit for ship repair they will enter the recycling market enabling very large vessels to be recycled at these facilities. That is why they are rightly on the (capacity) list of the EU ship recycling facilities.

Question 14: To what extent do you agree that the European list of ship recycling facilities has sufficient recycling capacity to cover forecasted needs?

NB: This question should be addressed to:

Member States' environmental administrations monitoring yards recycling ships
Recycling yard
EU and international association
Academic / research institute / civil society

- Strongly agree
- Somewhat agree
- Neutral
- Somewhat disagree
- Strongly disagree
- No opinion / don't know

Please explain your answer

This answer of ISRA is based on the analyses made by Sea2Cradle (Sea2Cradle provided permission to refer to that study). The number of EU flagged ships to be recycled will increase the coming years. A capacity shortage could occur in about 5-7 years from now, if recycling

capacity is not increased by then and on the assumption that no reflagging will take place.

However, the applications from ship recycling facilities in third countries for a place on the EU list are numerous (March 2023). (see attachment).

A number of them will not be able achieve this goal, but it can be expected that the EU list will expand more than sufficiently to cater for increasing recycling demand, also for the largest vessels. This will lead to sufficient capacity also in the (near) future. Furthermore, some promising initiatives in EU Member States based on new technologies have the potential to add significant extra capacity in the near future. "Re-opening" the recycling market in China will contribute to enlarge the future capacity.

ISRA is always open to discuss this issue, but hard figures until now are clear and give no foundation to expect a shortage of capacity.

Question 15: What type of ships (Bulk, Tanker, Container ships, offshore related or other) and of which size (length, Ldt) were recycled in your facility in 2020, 2021 and 2022?

NB: This question should be addressed to:

Recycling yard

	2020	2021	2022	Open field to elaborate
Type of ships (Bulk, Tanker, Container ships, Offshore related or other)				
Size (length, Ldt)				

Question 16: To what extent do you consider the SRR has facilitated the ratification of the Hong Kong Convention?

- To a large extent
- To some extent
- It had no effect
- It had a negative effect
- I do not know

Please explain your answer

The EU SRR has disclosed that the regime of the Hong Kong Convention (“HKC”) is far less strict (rather to be qualified as weak) in comparison with the EU SRR.

In particular the listing of facilities which have to comply to well described strict requirements in combination with the obligation of owners of end-of-life ships to have them dismantled at these facilities, is a very welcome supplementation of the HKC.

The EU SRR proves the more that the HKC does not offer an equivalent level of control, protection and enforcement of the Basel Convention (“BC”) as the parties of the BC repeatedly have underlined.

So, in the opinion of ISRA, the EU SRR has not facilitated a ratification but has issued a warning to the legislators of international law on ship recycling that the HKC, after being in force, will not offer whatsoever the same protection as the EU SSR does. So, they should be aware that the HKC regime has to be tightened up to a far stricter level.”

Question 17: On the basis of your experience in the country (countries) where you operate, to what extent is each cause contributing today to the problem that dismantling of large commercial ships is still mainly carried out outside EU-listed yards

NB: This question should be addressed to:

Member State and third State in their capacity as Flag State

Member State in their capacity as Port State

EU and international association

	To a large extent	To a moderate extent	To a small extent	Not at all	I do not know	Please explain your answer
Higher recycling prices offered by yards outside the EU list, as result of	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

strong demand for scrap steel						
Higher recycling prices offered by yards outside the EU list, as a result of lower labor, safety and environmental standards	X	○	○	○	○	○
Lack of capacity of EU-listed yards to dismantle large ships	○	○	○	○	X	○
Weak regulatory framework that makes it possible to circumvent rules by simply changing the ship's flag	X	○	○	○	○	○

Question 18: Please describe any other cause affecting the problem that dismantling large commercial ships is carried out outside EU-listed yards, where facilities and operations are below standards and lead to negative health and environmental impacts that in your view are not considered above

NB: This question should be addressed to all stakeholders

The majority of ship owners, cash buyers and brokers do not take their responsibility as in 2023 should be expected by not doing business with substandard facilities.

It proves that despite the very much appreciated initiatives of the EU by introduction of the EU SSR, the global community still must be convinced that green recycling is a must and recycling below standards a don't.

The EU SSR must stipulate the obligation of any shipowner to guarantee by automatic transfer provision that the ship after the commercial period will only be dismantled at an EU-listed yard. The scope of the EU SSR should be broadened (see hereunder)".

Also reflagging must be punished if used to circumvent the EU SSR (see hereunder)".

Question 19: To what extent have you been engaged in improving the implementation and enforcement of the SRR?

NB: This question should be addressed to:

Member State and third State in their capacity as Flag State

Member State in their capacity as Port State

Member States' environmental administrations monitoring yards recycling ships

Ship owner

Recycling yard

EU and international association

To a large extent

To a moderate extent

To a small extent

Not at all

I do not know

Please explain your answer

ISRA has been very active since 2019 informing EU Member States about the illegal export of EU-flagged end-of-life ships and circumvention of the EU SRR by reflagging. ISRA always informed the European Commission about these findings. A growing number of Member States have become more active in the enforcement of the legislation concerned. The European Commission has developed an active policy to towards the Member States to improve their obligations concerning the enforcement. Still there is the need for far more strict and intensive enforcement by the MS to be laid down in the EU SRR." (See also response on question 27)

Question 20: According to you, to what extent have the following stakeholders been engaged in improving the implementation and enforcement of the SRR?

NB: This question should be addressed to:

Member State and third State in their capacity as Flag State
 Member State in their capacity as Port State
 Member States' environmental administrations monitoring yards recycling ships
 Ship owner
 Recycling yard
 Classification society
 EU and international association

	To a large extent	To a moderate extent	To a small extent	Not at all	I do not know	Please explain your answer
Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Third countries states/competent authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU ship owners	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU Recycling yards	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

To a large extend: the European Commission!!

Question 21: To what extent have the following measures of the SRR contributed to ensure the proper management of hazardous ship materials?

NB: This question should be addressed to:

Member State and third State in their capacity as Flag State
 Member State in their capacity as Port State
 Member States' environmental administrations monitoring yards recycling ships
 Ship owner
 Recycling yard

	To a large extent	To some extent	It had no effect	It had a negative effect	I do not know	Please explain your answer
Elaborating IHM	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Maintaining/updating IHM	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Monitoring IHM through the conducting of surveys and issuance of relevant certificate	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Port state control	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing ship recycling plans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Approval of ship recycling plans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Verification of ship recycling plans (through the final survey and issuance of ready for recycling certificate)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Question 22a: To what extent do you consider the following specific measures of the SRR were effective for ship owners flying the flag of a Member State:

NB: This question should be addressed to:

Member State and third State in their capacity as Flag State

Member State in their capacity as Port State

Member States' environmental administrations monitoring yards recycling ships

Ship owner

Recycling yard

Classification society

Academia, research institutions and civil society

	To a large extent	To a moderate extent	To a small extent	Not at all	I do not know	Please explain your answer
Notification by the operator to the ship recycling facilities and Member States of all the relevant/necessary information to recycle the ship	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Question 22b: To what extent do you consider the following specific measures of the SRR were effective for administrations, competent authorities and recognized organizations under Regulation (EC) 391/2009:

NB: This question should be addressed to:

- Member State and third State in their capacity as Flag State
- Member State in their capacity as Port State
- Member States' environmental administrations monitoring yards recycling ships
- Ship owner
- Recycling yard
- Classification society
- Academia, research institutions and civil society

	To a large extent	To a moderate extent	To a small extent	Not at all	I do not know	Please explain your answer
Approval of ship recycling facilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

located in the EU						
Approval of ship recycling facilities located in third countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Report by Member States to the European Commission	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enforcement, monitoring and surveillance, including cooperation with other Member State authorities to prevent circumvention	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Question 22c: To what extent do you consider the following specific measures of the SRR were effective for ship recycling companies in Member States:

NB: This question should be addressed to:
 Member State and third State in their capacity as Flag State
 Member State in their capacity as Port State
 Member States' environmental administrations monitoring yards recycling ships
 Ship owner
 Recycling yard
 Classification society
 Academia, research institutions and civil society

	To a large extent	To a moderate extent	To a small extent	Not at all	I do not know	Please explain your answer
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Ensuring compliance with EU requirements for inclusion in the European list	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Question 22d: To what extent do you consider the following specific measures of the SRR were effective for ship recycling companies in third countries:

NB: This question should be addressed to:

- Member State and third State in their capacity as Flag State
- Member State in their capacity as Port State
- Member States' environmental administrations monitoring yards recycling ships
- Ship owner
- Recycling yard
- Classification society
- Academia, research institutions and civil society

	To a large extent	To a moderate extent	To a small extent	Not at all	I do not know	Please explain your answer
Application to the European list of ship recycling facilities and compliance with requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Question 23a: What are the costs associated with the following requirements of the SRR for ship owners flying the flag of a Member State:

NB: This question should be addressed to:

Ship owner

	High	Moderate	Low	I do not know	Not applicable to my organization	if possible please provide a quantification in €
Elaborate a list of hazardous materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Maintain a list of hazardous materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide and notify the operator of the ship recycling facilities and Member States with all the relevant/necessary information to recycle the ship	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Question 23b: What are the costs associated with the following requirements of the SRR for ship owners flying the flag of a third country:

NB: This question should be addressed to:
Ship owner

	High	Moderate	Low	I do not know	Not applicable to my organization	if possible please provide a quantification in €
Elaborate a list of hazardous materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Maintain a list of hazardous materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Question 23c: What are the costs associated with the following requirements of the SRR for administrations, competent authorities and recognized organizations under Regulation (EC) 391/2009:

NB: This question should be addressed to:
Member State and third State in their capacity as Flag State
Member States' environmental administrations monitoring yards recycling ships
Classification society

	High	Moderate	Low	I do not know	Not applicable to my organization	if possible please provide a quantification in €
Approve the ship recycling plan	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Perform surveys to ensure the good quality and compliance of the list of hazardous materials and ship recycling plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Issue inventory certificates and ready for recycling certificates	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Grant authorization to ship recycling facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Perform monitoring of authorized ship recycling facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Report to the European Commission on the state of ship recycling in the jurisdiction	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cooperate with other Member State authorities to prevent and address potential circumventions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

of the Regulation						
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Question 23d: What are the costs associated with the following requirements of the SRR for port states:

NB: This question should be addressed to:

MS in capacity of port State

	High	Moderate	Low	I do not know	Not applicable to my organization	if possible please provide a quantification in €
Control and inspect the ships' inventory certificates/Ready for recycling certificates/statements of compliance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Question 23e: What are the costs associated with the following requirements of the SRR for ship recycling companies in Member States:

NB: This question should be addressed to:

Recycling yard

	High	Moderate	Low	I do not know	Not applicable to my organization	if possible please provide a quantification in €
Develop a ship recycling plan	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Ensure compliance with EU requirements for inclusion in the European list	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Question 23f: What are the costs associated with the following requirements of the SRR for ship recycling companies in third countries:

NB: This question should be addressed to:
Recycling yard

	High	Moderate	Low	I do not know	Not applicable to my organization	if possible please provide a quantification in €
Apply to the European list of ship recycling facilities and meet the requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Question 24: Generally, to what extent do you consider the costs related to the SRR proportionate to the benefits?

NB: This question should be addressed to:
Member State and third State in their capacity as Flag State
Member State in their capacity as Port State
Member States' environmental administrations monitoring yards recycling ships

Ship owner
Recycling yard
Classification society
EU and international organization
Academia, research institutions and civil society

X Very efficient: benefits outweigh by far the costs

- Efficient: benefits outweigh the costs
- Costs are proportionate to the benefits
- Inefficient: costs outweigh the benefits
- Very inefficient: costs outweigh by far the benefits
- I do not know

Question 25: How did your revenues evolve since the implementation of the SRR (December 2018)?

NB: This question should be addressed to:

Ship owner
Cash buyer
Shipbroker
Recycling yard
Steel industry

- Growing
- Steady
- Declining
- Other

Please explain your answer

[open text box]

Question 26: Was the implementation of the SRR a determining factor in the evolution of the revenues observed?

NB: This question should be addressed to:

Ship owner
Cash buyer
Shipbroker
Recycling yard
Steel industry

- Yes
- No
- I do not know

If yes, please specify which

[open text box]

Question 27: Do you see opportunities to simplify the legislation or reduce unnecessary regulatory burdens without undermining the objectives of the SRR?

NB: This question should be addressed to:

Member State and third State in their capacity as Flag State

MS in capacity of port State

MS monitoring recycling facilities

Ship owner

Cash buyer

Shipbroker

Recycling yard

Steel industry

EU and international association

No

I do not know

If yes, please specify which

Simplification is perhaps not the right incentive: improvement by additional provisions must be feasible: on the subject of :

- reflagging
- enforcement

The phenomenon of reflagging causes a very serious problem. When the reflagging takes place in order to circumvent the EU SRR (in the sense that the owner by reflagging evades the obligation to offer the ship to a yard on the list for dismantling) the reflagged should be punished: EU SRR should be expanded with a clause that such a circumvention is forbidden and results in a punishable act or a likewise sanction. The prove of such a circumvention shall be established when the reflagged ship ends up in a non-listed yard. The owner, broker, cash-buyer or anyone who is responsible for the reflagging shall be held liable. Perhaps the flag state must be able to nullify reflagging in such a case or takes appropriate measures to prevent reflagging.

The lack of enforcement is also a very weak point: it results in a stream of end-of-life ship ending up at substandard facilities.

For the EC enforcement must be a subject that in many other regulations and directives is at stake: so, it will not be the first time that the EC is confronted with the question how to regulate a sound enforcement: ISRA is not a legislating organization; ISRA trusts the EC is able to address this issue during the evaluation by presenting to the stakeholders' possibilities how to improve enforcement.

Question 28: To what extent do you think the SRR sufficiently address the needs within the EU, as regards the new policy ambitions in particular for:

NB: This question should be addressed to:

- Member State and third State in their capacity as Flag State
- MS in capacity of port State
- Member States' environmental administrations monitoring yards recycling ships
- Ship owner
- Cash buyer
- Shipbroker
- Recycling yard
- Steel industry

	To a large extent	To a moderate extent	To a small extent	Not at all	I do not know	Please explain your answer
The reduction of greenhouse gas emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The circular economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The reduction of pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The EU new industrial strategy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

See answer under question 30

Question 29: According to you, should the scope of the SRR be extended to include some of these categories?

NB: This question should be addressed to:

Member State and third State in their capacity as Flag State

MS in capacity of port State

Member States' environmental administrations monitoring yards
recycling ships

Ship owner

Cash buyer

Shipbroker

Recycling yard

Steel industry

EU and international association

Yes

- No
- I do not know

Please explain your answer

See response under question 30.

Question 30: Is there a need to extend the scope of the SRR beyond ships flying the flag of a Member State?

NB: This question should be addressed to:

Member State and third State in their capacity as Flag State

MS in capacity of port State

Member States' environmental administrations monitoring yards
recycling ships

Ship owner

Cash buyer

Shipbroker

Recycling yard

Steel industry

EU and international association

X Yes

- No
- I do not know

If yes, please specify which

“The scope of the EU SRR must be extended beyond ships flying the EU flag by:

- extension of categories of ships
- EU based owners of ships
- EU shipowners based outside the EU
- Ships that enter EU ports

ISRA supposes that the EU SRR legislator has considered these or other possibilities to fix the scope of the regulation when drafting the regulation.

Which arguments by then were used to select the flag instead of other scopes? The EC is invited to inform the stakeholders by elaborating the pros and cons of the potential extensions of scope mentioned or others?

This information should be exchanged by the EC during the evaluation which will surely contribute to a more efficient discussion and consideration about this very important issue.

Question 31: Are there any inconsistencies in the SRR that you would like to raise? Please specify which ones

NB: This question should be addressed to:

Member State and third State in their capacity as Flag State

MS in capacity of port State

Ship owner

Recycling yard

Steel industry

Classification society

EU and international association

Three inconsistencies ISRA likes to mention:

1. The wording of the EU SRR seems not quite clear as it concerns the period of authorization of yards to be listed. For yards in a MS it seems a maximum period of ten (10) years (one extension of five (5) years after the first period of five (5) years: art 14 sub 1). For yards in a third

country seems an extension of each five (5) years permitted after the first period, without a maximum: art 15 sub 6) has to be verified.

2. The EC has taken the standpoint that there is too much uncertainty about the legal validity of accepting non-OECD yards on the list because of the Basel ban, now in force, to forbid export of wastes to non-OECD countries.

How is the EC going to solve this inconsistency? ISRA may refer in this context to article 30 paragraph 3 of the EU SRR obliging the EC: *“to make, if appropriate, timely proposals to address developments relating to international Conventions, including the Basel Convention, should it prove necessary”*.

3. When and how will the EC apply article 30, paragraph 2, given that the HKC might get into force within 2 years from now?

And, more specific, will the EC ever include yards authorized under the HKC in the European List, knowing that there is a great inconsistency and disparity between the regimes of Listing in the EU SRR and the non-existence of a comparable and equal system in the HKC?

Should this article not be revised?

Question 32: Are you aware of any element of incoherence between the SRR and one of the following international and EU frameworks/legislations?

NB: This question should be addressed to:
 Member State and third State in their capacity as Flag State
 MS in capacity of port State
 Member States’ environmental administrations monitoring yards recycling ships
 International organization

	Yes	No	I do not know	If yes, please provide a short explanation
Hong Kong Convention	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Basel Convention	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	

Waste Shipment Regulation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Waste Framework Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Port State Control Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Flag State requirements Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	

“With reference to our answer on question 16, it should be repeated that there is a great incoherence between the EU SRR and the HKC:

- parties of the BC concluded at the COP 10 in Columbia that the HKC does not provide an equivalent level of control, protection and enforcement as the BC
- The wording and the systematic of the SSR (in particular listing of approved yards) are far stricter than the HKC (SSR is HKC+)
- How will the EC, as party of the BC, ensure that the future legislation to be in force, will match both the BC and the EU SRR? In order to prevent incoherence and disparity?
- Can the EC anticipate on this issue?

Question 33: In the absence of the entry into force of the HKC, do you think that the SRR brings an added value compared to what the Member State could reasonably achieve alone?

NB: This question should be addressed to:

Member State and third State in their capacity as Flag State

MS in capacity of port State

Member States’ environmental administrations monitoring yards recycling ships

Ship owner

Cash buyer

Shipbroker

Recycling yard

Classification society

EU and international association

Academic / research institute / civil society

X Yes

No

- I do not know

Please explain your answer

ISRA is of the opinion that the scope of EU SRR exceeds the possibilities of the individual Member States. The EU SRR, though weak, addresses requirements for the facilities as well as requirements for exports, with an explicit role for the European Commission. A ship recycling regulation – with explicit requirements for non- EU based facilities cannot be achieved by individual Member States.

It should be noted that a better functioning EU SRR can have a substantial impact on a global level, impossible for individual Member States to achieve.

Potential financial instrument

In 2016, a study commissioned by the Commission concluded that a financial instrument, identified in the form of a Ship Recycling License, would stimulate safe and environmentally sound recycling. The license would be required for entry to EU ports, connected with fees that lead to capital accumulation that can cover the revenue gap between sound and unsound recycling. The financial instrument in the form of a Ship Recycling License assumes that the full capital amount would be paid to the ultimate owner of the ship on the condition that the ship was sent to an EU-listed ship recycling facility. If it is not the case, the accrued capital would be forfeited as a penalty and transferred to a fund to serve the objectives of the Regulation.

Question 34: On the basis of your experience in the country (countries) where you operate, how do you expect that each cause contributing to the problem of dismantling large commercial ships will evolve in the future (up to 2050), in the absence of a financial instrument being implemented

NB: This question should be addressed to:
All stakeholders

	Highly increase	Moderately increase	Unchanged	Moderately decrease	Highly decrease	I do not know	P
Higher recycling	○	○	X	○	○	○	

prices offered by yards outside the EU list, as result of strong demand for scrap steel							
Higher recycling prices offered by yards outside the EU list, as a result of lower labor, safety and environmental standards	X	○	○	○	○	○	
Lack of capacity of EU-listed yards to dismantle large ships	○	○	X	○	○	○	
Weak regulatory framework that makes it possible to circumvent rules by simply changing the ship's flag	X	○	○	○	○	○	

Question 35: On the basis of your experience in the country (countries) where you operate, how do you expect the dismantling of ships will evolve in the future up to 2050 without an EU intervention addressing that issue

NB: This question should be addressed to:

All stakeholders

- More ships will be recycled in EU-listed yards located in the EU
- More ships will be recycled in EU-listed yards located outside the EU
- X More ships will be recycled in non-EU-listed yards
- Unchanged
- I do not know

Please explain your answer

The question is not quite clear formulated: what is meant by “...without an EU intervention addressing that issue”?

In general: if the EU SRR is upgraded to the wanted level with appropriate enforcement, stricter sanctions against reflagging, a supplementary financial instrument and an appropriate stream of ships to the EU yards in combination with adequate rewards for the ship recyclers by the ship owners, stakeholders in the EU will surely invest in big yards on a wider scale.”

Question 36: On the basis of your experience, should the Hong Kong Convention enter into force over the coming years, are you of the opinion that

NB: This question should be addressed to:

Member State and third State in their capacity as Flag State

Member State in their capacity as Port State

Member States' environmental administrations monitoring yards recycling ships

Ship owner

Recycling yard

EU and international association

Academic / research institute / civil society

- The EU list should include all ship recycling facilities which have received a Hong Kong Convention certification
- The EU list should not automatically include ship recycling facilities which have received a Hong Kong Convention certification considering that the EU Regulation has more stringent requirements
- The EU list of ship recycling facilities should be removed

- I do not know

Please explain your answer

See response in question 36.

Question 37: To stimulate safe and environmentally sound recycling there is a need for a financial instrument

NB: This question should be addressed to:

All stakeholders

- Strongly agree
- Agree
- X No opinion / don't know
- Disagree
- Strongly disagree

Please explain your answer

Please find below the key elements of the financial instrument, more specific the Ship Recycling License.

In June 2016 Ecorys published a report commissioned by the European Commission: "Financial instruments to facilitate safe and sound ship recycling".

Summary Financial Instrument

- Various options were explored and one was the most viable:
- The Ship Recycling License.
- A Ship Recycling License (SRL): "By obliging all ships that call at EU ports to obtain a prior license from a centralized European agency, an instrument of a public, administrative law nature is created";
- This license requirement can be used to impose a financial instrument upon ship owners;
- Premium is levied;
- Is put in a Ship Recycling Fund;
- The full capital amount becomes payable after the ship has been recycled in compliance with the EU SRR;
- Dismantled in a facility not included in the European List: the ship owner forfeits the accrued rights to the payment;

- The procedure will need to be an administrative law procedure at the European level;
- The financial instrument proposed will generate impact over a time period of about 20 years;
- Adverse economic impacts:
 - Increase of ship's operating costs (in the order of 1%);
 - Costs of EU port calls (in the order of 2%);
 - Impacts on trade to/from the EU as a consequence of these cost increases;
 - Impacts on the shipbuilding market;
 - Second hand sales market of ships;
 - Administrative costs of the mechanism about 0,8% of the license fees;
- Establishment of a new European Ship Recycling Agency
- Integration of the Ship Recycling License requirement into Port State Control as exercised by EU Member States under the Paris Memorandum of Understanding (MOU), the Port State Control Directive 2009/16/EC and into the Thetis information system as developed by EMSA

ISRA is in favor of instruments that stimulate sound and safe recycling. It should be taken into consideration that price differences not only occur through substandard recycling, but can be explained by lower wage costs and lower costs of transportation, better prices for scrap etc. Intervening in the market by a financial instrument could lead to a breach of a comparative advantage of some ship recycling facilities and should be properly addressed.

Furthermore, the proposal for the Ship Recycling License knows various probably time-consuming elements:

- All the ports in the EU have to participate;
- A levy should be collected by the ports and harbor authorities;
- The system requires a new public body in the EU;
- Large amounts of money are involved in the Ship Recycling Fund. This requires a very well-equipped organization;
- Dispute settlement, appeal etc. should be well designed;
- Relationship with HKC?

In the view of ISRA it could take years and years to prepare and implement a financial instrument. This should be taken into consideration.

ISRA invites the European Commission to produce a paper addressing the various elements of this License and an indication of the entry into force of this instrument. After this has been done, a stakeholder survey could then indicate the appreciation of this instrument.

Question 38: In general, what would be the impact of introducing a financial instrument in the form of a Ship Recycling License in facilitating safe and environmentally sound ship recycling?

NB: This question should be addressed to:

All stakeholders

- High positive impact
- Moderate positive impact
- Unchanged
- Moderate negative impact
- High negative impact
- I do not know

Please explain your answer

(See answer 37)

Question 39: Do you think that a financial instrument in the form of a Ship Recycling License would still be relevant in the Hong Kong convention will enter into force?

NB: This question should be addressed to:

Member State and third State in their capacity as Flag State

Member State in their capacity as Port State

Member States' environmental administrations monitoring yards recycling ships

Ship owner

Recycling yard

Steel industry

Classification society

Maritime Law office

EU and international association

- Strongly agree
- Agree
- X No opinion / don't know
- Disagree
- Strongly disagree

Please explain your answer

Compared with EU SRR, the HKC has some fundamental weaknesses, in the field of the requirements for the facilities, the absence of a regulatory framework for exports of end-of-life ships and a questionable accession procedure carried out by the authorities of the country concerned. The financial instrument as a part of the EU SRR will not change this fundamental inequality between the two regimes.

Question 40: In particular, what do you think would be the impacts of introducing a financial instrument in the form of a Ship Recycling License (with no other change being implemented), when it comes to:

NB: This question should be addressed to:

- Member State and third State in their capacity as Flag State
- MS in capacity of port State
- Member States' environmental administrations monitoring yards recycling ships
- Ship owner
- Cash buyer
- Shipbroker
- Recycling yard
- Steel industry
- EU and international association

	High increase	Moderate increase	No increase or decrease	Moderate decrease	High decrease	I do not know	Please explain your answer
The number of ships	x	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	When th financial

scrapped in EU-listed yards							instrument works it could have serious impact .
The number of ships scrapped in non-EU-listed yards, in a safe and sound manner	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>		<input type="radio"/>	Question not understood
The age of the ship at which it is scrapped in a safe and sound manner	<input type="radio"/>	<input type="radio"/>	<input type="radio"/> X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
The number of shipbreaking yards in EU-listed yards	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
The number of shipbreaking yards in non-EU-listed yards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/> X	<input type="radio"/>	
The scrapping capacity of EU-listed yards	<input type="radio"/> X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
The scrapping capacity of non-EU-listed yards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	X	<input type="radio"/>	

The costs of adjusting the current scrapping capacity of shipbreaking yards for EU-listed yards	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/> X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
The second-hand market of ships	<input checked="" type="radio"/> X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
The number of countries where EU-listed shipbreaking yards are located	<input checked="" type="radio"/> X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	

Question 41: Based on your experience, do you think it is relevant introducing a financial instrument in the form of a Ship Recycling License if the scope of the ship recycling Regulation would be linked to the beneficial ownership?

NB: This question should be addressed to:

Member State and third State in their capacity as Flag State

Member State in their capacity as Port State

Member States' environmental administrations monitoring yards recycling ships

Ship owner

Recycling yard

Steel industry

Classification society

Maritime Law office

EU and international association

Academic / research institute / civil society

- Yes, these measures have cumulative effects

- No, these measures have similar effects
- No, there are risks/difficulties in combining these two measures
- I support none of these measures
- I don't know

Please explain your answer

If the assumption that circumvention through reflagging will not occur anymore by introducing the beneficiary ownership. If this would increase the effectivity of the EU SRR substantially the need for a Ship Recycling License becomes less obvious. Circumvention could then be ruled out and the EU SRR will be far more effective.

Question 42: How would the introduction of a financial instrument in the form of a Ship Recycling License affect the operating costs at your organization?

NB: This question should be addressed to:

Member State and third State in their capacity as Flag State

MS in capacity of port State

Member States' environmental administrations monitoring yards recycling ships

Ship owner

Cash buyer

Shipbroker

Recycling yard

Bank financing the shipping sector

Maritime Law office

EU and international associations

International organizations

- Large increase in operating costs
- Small increase in operating costs
- No impact on operating costs
- Small decrease in operating costs
- Large decrease in operating costs
- I do not know

Please explain your answer

[open text box]

Question 43: Considering the introduction of a financial instrument in the form of a Ship Recycling License to promote safe and environmentally sound recycling of ships, can you provide an estimate of the type and quantity of one-off costs (e.g., adjustment costs for personnel and equipment costs occurring only once) for your organization? If no specific estimate is available, please provide an estimate of the one-off costs using the following ranges: € 0-20,000, € 20,000-100,000, € 100,000-500,000, € 500,000-1 million, > € 1 million

NB: This question should be addressed to:
 Member State and third State in their capacity as Flag State
 MS in capacity of port State
 Member States' environmental administrations monitoring yards recycling ships
 Ship owner
 Recycling yard
 Maritime law office

	€ 0-20,000	€ 20,000-100,000	€ 100,000-500,000	€ 500,000-1 million	> € 1 million	Don't know	If you know the precise amount, please fill it in here
Adjustment costs for personnel occurring only once							
Equipment costs occurring only once							

Question 44: Considering the introduction of a financial instrument in the form of a Ship Recycling License to promote safe and environmentally sound recycling of ships, can you provide an estimate of the type and quantity of recurring costs (e.g., adjustment costs for personnel and equipment costs occurring on annual basis) for your organization?

NB: This question should be addressed to:
 Member State and third State in their capacity as Flag State
 MS in capacity of port State
 Member States' environmental administrations monitoring yards recycling ships
 Ship owner
 Recycling yard
 Maritime law office

	€ 0-20,000	€ 20,000-100,000	€ 100,000-500,000	€ 500,000-1 million	> € 1 million	Don't know	If you know the precise amount, please fill it in here
Adjustment costs for personnel on annual basis	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Equipment costs occurring on annual basis	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	

Question 45: The financial instrument in the form of a Ship Recycling License should apply to ships smaller than 500 gross tons

NB: This question should be addressed to:
 Member State and third State in their capacity as Flag State
 Member State in their capacity as Port State

Member States' environmental administrations monitoring yards
recycling ships
Ship owner
Recycling yard
Steel industry
Classification society
Maritime Law office
EU and international association
Academic / research institute / civil society

X Strongly agree

- Agree
- No opinion / don't know
- Disagree
- Strongly disagree

Open field to elaborate

This would be consistent with the broadening of the scope of the EU SRR.

In 2016, a study commissioned by the Commission concluded that a financial instrument, identified in the form of a Ship Recycling License, would stimulate safe and environmentally sound recycling. The license would be required for entry to EU ports, connected with fees that lead to capital accumulation that can cover the revenue gap between sound and unsound recycling. The financial instrument in the form of a Ship Recycling License assumes that the full capital amount would be paid to the ultimate owner of the ship on the condition that the ship was sent to an EU-listed ship recycling facility. If it is not the case, the accrued capital would be forfeited as a penalty and transferred to a fund to serve the objectives of the Regulation. The funds forfeited by the ship owners that will ultimately not recycle their ships in an EU-listed yard, regardless of the money put aside for that purpose with a Ship Recycling License could best be used for other purposes.

Question 46: Based on your experience, what the best use of the funds forfeited would be?

NB: This question should be addressed to:

Member State and third State in their capacity as Flag State
MS in capacity of port State
Member States' environmental administrations monitoring yards
recycling ships

Ship owner
Maritime Law office
EU and international associations
International organizations
Academic / research institute / civil society

- Cross-subsidise ship recycling facilities to assist them in reaching the standards required for their inclusion in the EU-listed yards
- X Invest in R&D to further promote a sustainable shipping sector
- Subsidise other (ultimate) ship owners in cases where their ship has accumulated less than the full capital amount
- Other

Please explain your answer

R&D extended to maritime institutes and universities would be appropriate.

Question 47: The financial instrument in the form of a Ship Recycling License should completely cover the revenue gap between sound and unsound recycling for a certain type of ship

NB: This question should be addressed to:

Member State and third State in their capacity as Flag State
MS in capacity of port State
Member States' environmental administrations monitoring yards recycling ships
Ship owner
Maritime Law office
EU and international associations
International organizations
Academic / research institute / civil society

- Yes, it should completely cover the gap
- X No, a partial covering of the gap is sufficient
- Other, please specify

Please explain your answer

The revenue gap can be the result of a comparative (dis)- advantage. A thorough analyses about comparative advantages should be a necessary part of the financial instrument.

Question 48: Based on your experience, to what extent would the financial instrument impact the price of the steel in the EU?

NB: This question should be addressed to:

Steel industry

- Large increase of the price
- Small increase of the price
- No impact on the price
- Small decrease of the price
- Large decrease of the price
- I do not know

Please explain your answer

The impact for the price of steel in the EU should be absent since the financial stimulus is not solely related to EU based facilities.

5 Closure

Question 49: Do you have any additional comments or information you want to provide on the topics as discussed in this survey?

[open text box]

Question 50: Do you have any interesting sources and/or documents you would like to share? Please use the link below to upload any documentation.

[open text box]

Question 51: Can you please confirm that you have read the Privacy Notice?

I confirm that I have read the Privacy Notice

Question 52: Would you be willing to participate in an in-depth interview for this study?

Yes

No

Question 53: If yes, please provide your name, organization, email address and phone number

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Your responses have been registered! Thank you for taking the time to complete the survey-questionnaire, your input is valuable to us.