

## INSIGHT

## WHY IT PAYS TO PLAN AHEAD

**Responsible ship recycling now starts years before a vessel reaches the yard, says Amol Bande, Principal Surveyor, Ships and Technical Services, IRIclass**



For many years, discussions around responsible ship recycling focused almost exclusively on what happened inside the recycling yard. Questions around worker welfare, hazardous waste handling and environmental protection rightly dominated the conversation, while responsibility was often viewed as resting primarily with the recycler.

That position has fundamentally changed.

With the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships (HKC) entering into force on 26 June 2025, ship recycling is no longer simply an end-of-life activity. It has become a lifecycle obligation involving shipbuilders, owners, managers, flag administrations, classification societies and recycling facilities alike.

This shift represents one of the most significant changes to ship recycling in decades.

The Convention has accelerated legislative reform in major recycling states. India has already implemented its Recycling of Ships Act 2019,

supported by the Recycling of Ships Rules and Regulations, while Bangladesh has strengthened its framework through the establishment of the Bangladesh Ship Recycling Board. Across South Asia, HKC-compliant recycling facilities are now operating, with India accounting for the largest number.

However, compliance should not be viewed simply as obtaining certification.

Responsible recycling in 2026 is increasingly judged by how effectively the entire process is managed, from the construction and operation of a vessel through to its final dismantling.

The industry is moving away from asking whether a recycling yard holds the correct approvals and towards asking whether every stakeholder has fulfilled one's own responsibilities under the Convention.

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Perhaps the biggest misconception that still exists is that ship recycling only becomes relevant when a vessel reaches the end of its commercial

life. In reality, the process begins much earlier.

The Inventory of Hazardous Materials (IHM) is intended to be a living document that follows the ship throughout its operational life. Every equipment replacement, repair, conversion or modification has the potential to affect the inventory. If those changes are not properly managed, the integrity of the document gradually deteriorates, making compliance far more difficult when recycling eventually begins.

Unfortunately, many owners still treat the IHM as a one-off certification exercise. Once the initial approval has been completed, maintenance procedures often weaken over time. Changes of ship managers or crew, inconsistent supplier declarations and poor document control all contribute to the gradual loss of traceability.

By the time recycling is being considered, owners can find themselves attempting to reconstruct years of missing information rather than managing a controlled process.

That creates unnecessary commercial, operational and regulatory risk.

Planning for recycling should begin several years before a vessel is expected to leave service. Responsible owners should already be considering likely recycling destinations, understanding whether their flag administration permits recycling in those jurisdictions and ensuring the vessel remains fully compliant until its final voyage.

Equally important is preparing the vessel itself. Minimising operational activity before recycling, maintaining seaworthiness and completing pre-cleaning requirements all contribute to a safer and more efficient dismantling process while reducing unnecessary delays and costs.

Selecting the recycling yard also deserves greater scrutiny than simply checking whether it possesses HKC certification.

A certificate alone does not tell the whole story.

Owners should understand exactly what activities the yard is authorised to undertake, any limitations attached to that approval and whether the facility has genuine experience of recycling that particular vessel type. Past environmental or safety incidents should also form part of the assessment, alongside the yard's worker safety arrangements and downstream waste management capability.

The objective should be confidence that the selected facility can recycle the specific vessel safely, legally and in an environmentally sound manner.

This wider perspective is increasingly attracting the attention of financiers and charterers as well.

Historically, financial stakeholders concentrated primarily on commercial performance, vessel condition and statutory certification. Going forward, they are likely to place much greater emphasis on end-of-life governance.

One question that deserves greater attention is whether the vessel's IHM has been properly maintained throughout its operational life. Likewise, the International Ready for Recycling Certificate should become an increasingly important document when vessels approach retirement.

These documents provide evidence not simply of regulatory compliance but of effective lifecycle management.

Independent assurance also has an increasingly important role.

Classification societies provide confidence that both ships and recycling facilities comply with applicable HKC requirements through surveys, audits and certification. Equally important, however, is distinguishing between paper compliance and genuine operational implementation.

The difference is often visible on the ground.

In genuinely compliant facilities, safety procedures are understood not only by management but by supervisors and frontline workers. Training is translated into everyday working practices, with employees demonstrating an understanding of workplace hazards, environmental controls and safe dismantling procedures.

Where compliance exists only on paper, those connections are often missing.

As the Convention matures, expectations are likely to continue evolving. By 2028, stakeholders are likely to demand greater transparency throughout the recycling process, including digital documentation, real-time monitoring of dismantling activities, improved downstream waste traceability and greater visibility of incident records and audit findings.

These developments should not be viewed as additional administrative burden.

Instead, they reflect a broader shift in how shipping approaches sustainability. Responsible recycling is no longer simply about achieving compliance at the end of a vessel's life. It is about demonstrating that environmental stewardship, worker safety and regulatory discipline have been embedded throughout the vessel's operational lifecycle.

The Hong Kong Convention has established a common international framework. The next challenge for the industry is ensuring that responsible recycling is measured not by policies or certificates alone, but by consistently controlled outcomes that can be demonstrated from the day a ship enters service until the day it is safely dismantled.

