

Opening statement of ISRA during plenary COP 10 (Tuesday 18th oktober 2011)
concerning agenda item 3, c, (vii) environmentally sound dismantling of ships

Good afternoon to you all

- as ISRA takes the floor for the first time and although you madame president are already in function for two days , it is never too late to congratulate you with your election;
- We also like to thank the Basel secretariat for the thorough preparation of this Convention , in particular the way documents have been drafted and made available;
- Furthermore the COP 10 organizing country Columbia deserves great appreciation for the warm hospitality;
- finally , as ISRA is a very young association (only founded four years ago to make an international platform for green ship recyclers) we are very pleased to have the opportunity as observer, to present our views to the Convention: we did already in writing and we are happy to make this statement;

now concerning the subject of Dismantling of ships:

- we all know that it took several years to make progress in the SR file; this is not strange as this file is complex because many different , sometimes conflicting interests meet each other;
- thanks to the common efforts of the parties of BC, IMO and ILO and others, the HK Convention was formalized in may 2009;

Now the question of equivalence is on the table: about the issue i like to make the following remarks:

1. Firstly I refer to the two statements (of April and August, part of the Convention documents) in which the view of ISRA extensively described and motivated: conclusion is that we support the HKC fully : we feel that the Convention offers promising equipment to make the SR world better; but much will depend of the willingness of the participants of the industry to comply with the Convention and the governments to look after them;

2. Secondly : why is HKC equivalent? Let's keep it simple: the practical answer is that the Basel Convention does not work for end of life ships: it is a solid instrument for the control of all kind of wastes moved across boundaries , but is not solid for end of life vessels; we all know (on several occasions elaborated, lately in Lisbon) how easily BC can be circumvented and it was a good initiative

to do something about it . Without a fresh regime, the SR file would not have made any progress!

3. Thirdly: The HK Convention not only offers specific regulations for ships but it also pays attention to sound ship recycling procedures and methods and , (important) contains strict requirements for SR Facilities where , as we all know, a lot still is to gain : such specilized legislation for ships , for recycling methods, the workers and the facilities , the Basel Convention cannot offer;

4. One might feel that the HK Convention could have been stricter on some items and also ISRA feels that there are still many wishes to fulfill, but (for the time being and in this stage of the file) HKC deserves the benefit of the doubt: it is better than what we have.

5. Let me finish with two recommendations:

* Both the reports of the UN Rapporteur and the CIEL study show that there are some items which deserve further attention and research whether and if so, how they can improve HKC and perhaps the BC during the interim period to follow; I would suggest that a combined working group of representatives of BC, IMO , ILO and stakeholders (amongst which industry) should first study whether these items are relevant enough to put them on a agenda as the new challenge after HKC;

* But, and that is my final remark , there is still a lot of improvement necessary on the workfloor : therefore we very welcome the programmes initiated by the Basel Convention which have the goal to improve present ship recycling practises ; there is a lot to do here; ISRA is happy to offer its expertise to support these programs.

Thank you madame President