

The ECSA secretariat has analysed the EU COM/EMSA documents and came to the following conclusions:

- In the covering Commission paper it is stated that the average tonnage of EU flagged vessels recycled is 588.000 LDT. The average tonnage of ships that changed flag from an EU flag is 432.000 LDT. This makes around 1.020.000 LDT as the average over the 5 years examined (2013-2017). Note that an average year is not a real quantity but a statistical average. **The EU SRR does not define capacity as the average LDT recycled in a 10 year period, but the maximum recycled in any year of the last 10 years.** This to make sure that the European list can provide enough capacity for the busiest years too.
- The busiest year out of the five years examined was 2013 when 989.000 LDT of EU flagged ships were recycled and 635.000 LDT of ships that changed flags from an EU flag within the last year. This makes **1.624.000 LDT for 2013.**
- Note that 2012 was the busiest year in ship recycling, as can be seen in the ECSA capacity calculations and other documents widely available (IMO, IHS and Dr N Mikelis). 2012 was busier than 2013 by 23 % in terms of GT. Increasing the 1.624.000 LDT by 23% would lead to **1.998.000 LDT (= 2.000.000 LDT)**
- Interestingly, EMSA data show that the **EU based facilities recycled 65.000 LDT, 30.000 LDT, 53.000 LDT, 33.000 LDT and 27.000 LDT** in the years from 2013 to 2017. This differs from the 330.000 LDT they are referring to in the explanatory note (and the theoretically capacity of 1.165.000 LDT).

This having said, and as also acknowledged in our own capacity calculations, all data come with a level of uncertainty, given the empirical conversion factors used. Hence, all calculations have a limited merit. Note that in the IHS database only (around) 1 out of 4 (5) ships comes with exact data on LDT. Both EMSA and ECSA had to deal with this in their calculations. ECSA has published the conversion factors used.