DNV·GL

A SHIP RECYCLING FACILITY IN TURKEY

Site inspection report application 34

European Commission DG Environment

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Objective: The objective of the on-site inspection is to verify compliance of the facility with the requirements set out in the Ship Recycling Regulation.

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1 EXECUTIVE SUMMARY

The objective of this report is to document the results of the site inspection at Ege Gemi Söküm San. ve. Tic. A.S, located in Aliaga (Izmir region, Turkey), following the facility's application for inclusion in the European List of ship recycling facilities. The on-site inspection took place on the 9th and 10th of September 2020.

The applicant appears to have a well running facility with a proven track record and has in place facilities which one would expect for a facility applying for inclusion in the European List of ship recycling facilities. It was evident that the applicant had also made important investments in recent years to upgrade its ship recycling capability.

Based on the site inspection, the evaluators specified areas where full compliance with the requirements for inclusion in the European List of ship recycling facilities could not be confirmed:

1. Ship Recycling Facility Plan (SRFP): The governing document for the site inspection, defining the baseline of the facility's performance, is the SRFP. A paramount task of the inspection was to verify that the SRFP is a living, logical and systematic document reflecting the developments and practice on the ground. The evaluators could not verify that all procedures and practices observed on the ground were included and explained in the SRFP. Therefore, the applicant was requested to review and update the SRFP.
2. Protection of the environment / control of leakages: [redacted]
3. Waste management: [redacted]
4. Downstream waste facilities: there is only limited updated information available to the evaluators regarding the operation of the specific downstream facilities involved in the management of certain waste streams leaving the yard.

In response to the above findings, the applicant has made some improvements after the site inspection and provided updated documentation to clarify a number of points. The applicant's responsiveness is appreciated. However, after reviewing the applicant's responses to the draft report, further improvements would still be required before compliance with the relevant requirements of the EU Ship Recycling Regulation can be confirmed.

2 INTRODUCTION

The European Commission DG Environment (hereafter referred to as The Commission) has contracted DNV GL to conduct a site inspection of the recycling facility Ege Gemi Söküm San. ve. Tic. A.S., located in Aliaga (Izmir region, Turkey) hereafter referred to as the Facility. An application for inclusion in the European List of ship recycling facilities has been registered for this facility under application number 34.

3 OBJECTIVE

The objective of the on-site inspection is to verify compliance of the facility with the requirements set out in Article 13, 15 and 16 of the Ship Recycling Regulation and clarified in the 2016 Technical guidance note[1].

Hereunder the objectives of DNV GL's methodology is to:

- Verify the Facility's capability to comply with the regulations and requirements listed in the assessment scope
- Assure that documented recycling processes, work procedures, quality controls and document handling are managed and implemented as specified in the regulations and requirements
- Ensure that the Facility has sufficient knowledge and understanding of the regulations and requirements for recycling facilities
- Assure consistent evaluation of facilities on equal terms

4 SCOPE OF WORK

The scope of the assessment is, according to contract:

- Ship recycling regulation (EU) No 1257/2013
- Technical guidance note under Regulation (EU) No 1257/2013 on ship recycling

This inspection also considered article 13(1) of the Ship Recycling Regulation: "In order to be included in the European List, a ship recycling facility shall comply with the following requirements, in accordance with the relevant Hong Kong Convention provisions and taking into account the relevant guidelines of the IMO, the ILO, the Basel Convention and of the Stockholm Convention on Persistent Organic Pollutants".

The scope for the assessment methodology is divided into three main elements and a number of second and third level sub-elements. These practical steps ensured that all article 13, 15 and 16 SRR requirements for inclusion of a ship recycling facility in the European List were checked.

1. **Management**

- Facility business model and quality statement
- Policy
- Management, ownership and organisation
- Quality assurance systems and certificates

[1] C/2016/1900, Communication from the Commission — Requirements and procedure for inclusion of facilities located in third countries in the European List of ship recycling facilities — Technical guidance note under Regulation (EU) No 1257/2013 on ship recycling.

- Human resources (availability, skills and experience, training, stability etc.)

2. Safety, security and the environment

- Safety & health (PPE, hazardous materials, fire safety, medical services etc.)
- Security
- Environment (spills, emissions, etc.)
- Emergency preparedness and response (fire, medical, environmental etc.)
- Regional conditions (acts of nature, political, etc.)

3. Vessel demolition

- Applied rules, regulations and internal standards
- Recycling control, inspection and supervision regime
- Non-conformities and corrective actions
- Document control
- Facilities (methods, capacities, condition of equipment, logistics, etc.))
- Maintenance
- Recycling planning and execution
- Methodology, criteria and performance regarding:
  - Project start-up, commercial process etc.
  - Ship Recycling Facility Plan (SRFP)
  - Contract review, verification and acceptance criteria owner / cash-buyer / facility
  - Pre-planning
  - Vessel preparation (IHM, Ship Recycling Plan, flag state clearance, pre-cleaning etc.)
  - Vessel arrival and securing
  - Demolition management (methodology, "safe for entry", "safe for hot work", working at heights, lifting, supervision and reporting)
  - Waste disposal (sorting, sub-contractors, end users)
  - Completion instruction
  - Project close-out with de-briefing, lessons learned, suggestions for improvement

5 METHODOLOGY AND ACTIVITIES

The methodology followed the framework of DNV GL's facility assessment protocols and reporting formats, calibrated with the requirements and criteria of the Ship Recycling Regulation as clarified in the 2016 Technical guidance note.

Activities:

- Preparations, scheduling, travel arrangements, fact-finding, etc.
- Issue objective, scope and schedule to facility in advance
- Site assessment (2 days; 3 assessors)
- Reporting
- Issue of draft report
- Implement comments to the draft report
- Final report

The on-site assessment was performed according to a schedule advised to the Facility in advance, incorporating:

- Opening meeting
  - Introductions, present objective, scope and methodology, agree on schedule
  - Review of facility history, current activities, future ambitions
- Interviews with key responsible personnel in all relevant disciplines, including
  - Ownership and management
  - Contracts
  - Planning, preparations, vessel arrival and securing
  - Quality assurance, quality management systems
  - Human resources
  - Health, safety, security and environment
  - Vessel dismantling management
  - Quality control, document control
  - Project management
- Document review
  - Spot checks and evaluation of consistency, content, validation and language. Traceability
- Facility site inspection
  - Inspection of Facility, all workstations and worker facilities

- Inspection of vessel, for access and escape-ways
- Spot-checks of worker certificates and permits, crane certificates
- Lifting equipment, fall barriers, safe for entry, safe for hot-work etc.
- Questioning (brief) of foremen / supervisors on key procedures

- Closing meeting
  - Reiterate the objective of the inspection and present preliminary results in way of initial observations and findings
  - Facility may respond to the initial results, and agree to rectify non-conformities including deadlines and corresponding responsible persons
  - Acknowledgements and departure

6 RESULTS OF THE ASSESSMENT

The site inspection of the facility was carried out on the 9th and 10th of September 2020 at Ege Gemi Söküm, located in Aliaga (Izmir region, Turkey).

The company was established in December 1988 and the facility has been involved in the ship recycling business in Aliağa since 1990 and operates at Parcel 17. The main representatives from the facility during the inspections were [redacted] and [redacted].

The evaluators from DNV GL were [redacted] and [redacted].

The evaluators also visited the Ship Recycling Association of Turkey (SRAT) in the afternoon on the 7th of September.

[redacted] from the Ministry of Transport and Infrastructure represented Turkish authorities during the inspection.

The facility had 35 employees, excluding management positions, at the time of the site inspection. The Facility is located in the outskirts of the city of Aliaga (population of around 100,000), approximately 6 km from the city centre. Overall, the surrounding area belongs to one of Turkey's largest industrial provinces with major bulk and container ports, power generation plants, oil terminal, LNG gas terminal, refinery and petrochemical complex, along with approximately 20 ship recycling facilities. Adjacent to the facility and both to the east and the west are similar facilities. Access road connecting with the road transportation network is accessible to the south of the facility.

The table below summarises the results of the site inspection with respect to article 13, 15 and 16 of the SRR requirements for inclusion of a ship recycling facility in the European List.

DNV GL wishes to thank the management and key personnel at Ege Gemi Söküm for the friendly reception and good cooperation during the inspections, ensuring that we were well cared for and that everything went smoothly. Facilities for the assessment were excellent and the fullest degree of access to all aspects of the Facility's areas and management was offered.

Site inspection results			Compliant?
Article 13-1 (a) it is authorised by its competent authorities to conduct ship recycling operation			
Technical guidance note 2.2.1, MEPC 210(63) Section 3.2.2	Authorisation	Thoroughly checked during the document review. Updated and valid certificates witnessed on-site.	Compliance was confirmed during the inspection.
Article 13-1 (b) it is designed, constructed and operated in a safe and environmentally sound manner			
Technical guidance note 2.2.1	Measures and infrastructure	The facility uses the slipway landing method, employing a combination of afloat and landing dismantling. All secondary cutting takes place on concrete flooring with drainage. Dismantled materials from the vessel to shore are transported by crane or placed on steel plates which are pulled to the secondary cutting area. A general cargo ship was under dismantling during the site inspection, with additional two ships landed at the plot, one general cargo ship and one tug. The evaluators did not witness any lifting of cut blocks from the vessel to the secondary cutting area but there was no reason to believe this was not done according to regular practice as seen in the Aliaga cluster. It was perceived during the site visit that the facility recycling methodology worked according to the same principles as the other applicants. The facility is equipped with two winches (capstans) to pull the vessels on shore, each with a 500 tons capacity. The vessel currently under dismantling was seen with the double bottom pulled partly beyond the drain line.	Compliance was confirmed during the inspection.
Article 13-1 (c) it operates from built structures			
Technical guidance note 2.2.4	Operates from built structures	The facility operates by the landing method. The bow of the vessel is landed onshore which has a narrow sandy zone, followed by a concreted area prior to the drain line. Beyond the drain line, the secondary cutting area is located. The operation is from built structures, with cranes, trucks, and a loader on concrete	Compliance was confirmed during the site inspection.

		flooring. The facility is equipped with two winches to pull the vessels on shore, each with a 500 tons capacity. The maximum width of a ship to be recycled is limited by the width of the facility which is 49 m. Topside blocks and sections are hooked up by crane before final cutting and lifted and transported to the impermeable floor of the secondary cutting zone. Hence, the facility operates with the principle of using the vessels' hulls as built structure during primary cutting. A general cargo ship under dismantling was seen with the double bottom partly pulled beyond the drainage line. Cutting observed on-site was taking place beyond the drainage line.	
Article 13(1) (d) it establishes management and monitoring systems, procedures and techniques which have the purpose of preventing, reducing, minimising and to the extent practicable eliminating health risks to the workers concerned and to the population in the vicinity of the ship recycling facility, and adverse effects on the environment caused by ship recycling			
Technical guidance note 2.1.4 (a), (b) MEPC210(63) Section 3.4.1 / BC TG 6.2	General	The environmental monitoring program is described in section 3.4.1 in the SRFP V12 on page 71.	Compliance was confirmed during the inspection.
	Noise	The Facility monitors noise in the surrounding working area and personnel noise. The Facility is in a heavy industry area well away from populated centres, thus noise to domestic neighbours is of no concern. The facility monitoring also includes personnel exposure to vibration. It is noted that the noise measurements are above the Turkish limit and subsequently the workers affected shall be offered ear protection.	Compliance was confirmed during the inspection.
	Air	The air quality monitoring includes dust level in the workplace, personnel dust, chemical levels in the workplace and thermal comfort. All results were within the national requirements.	Compliance was confirmed during the inspection.
	Water	At the time of the desk assessment, sea water analysis by [redacted] from March 2019 were attached. The analysis was provided in Turkish language and	Compliance was partly confirmed after

		analysed for suspended solids, heavy metals, ammonia, dissolved oxygen, pH, turbidity, oil, phenols, organic matter. However, brominated flame retardants and POPs were not included in the analysis. Sea water samples are taken by the Provincial Department of Environment authorities every 6 months and the results forwarded to SRAT. It has previously been brought up with SRAT that additional parameters such as brominated flame retardants and POPs are required. This was also specified in the desk assessment report. The evaluators have access to a seawater analysis report dated 18.09.2020, however if these samples are taken every 6 months a report from March 2020 should have been available. This could possibly have been postponed due to the Covid-19 situation. The applicant was requested to ensure additional samples and analysis, and comparison with a well-established water standard. In response to this request the applicant forwarded an e-mail that they had sent to [redacted] asking for additional parameters to be included. The response from [redacted] was that it would not be possible to meet their request at this time. The previously analysed parameters have been compared to "WATER POLLUTION CONTROL REGULATION OF TURKEY, NO:25687", published on 30.12.2004. More recent water samples analysed for all relevant parameters and comparison with a well-established water standard is required before full compliance can be confirmed.	the inspection.
	Soil	During the desk assessment, the applicant forwarded a soil analysis report from [redacted], dated 08.01.2016, followed by a more recent soil analysis report from 2019. The applicant was informed in the desk assessment that this was not sufficient and detailed information was provided on the missing items. During the site inspection the evaluators were told that new soil samples had been taken in 2020. The soil samples have been analysed by accredited laboratories [redacted] and [redacted]	Compliance was confirmed after the inspection.

		In response to the draft report the applicant forwarded the analysis results and a comparison with well-established standards. Most parameters were found within the limits. Some parameters were found to exceed the limits; however, the concentrations are still acceptable with regards to workers health.	
	Sediment	No monitoring of sediment had been implemented at the time of the desk assessment. During the site inspection the evaluators were informed that sediments had been sampled for the first time in 2020. The sediment samples had been analysed by accredited laboratories but not compared against a well-established sediment standard. In response to the draft report the applicant forwarded the analysis results and a comparison with well-established standards. Most parameters were found within the limits. Some parameters were found in high concentrations and exceeding the limits, in particular PAH and lead. As the sediment is below water the concentrations are still acceptable with regards to workers health. The applicant assumes that the high values for PAH is related to exhaust fumes of the construction equipment and the emissions from hot work. The applicant should investigate this further and, if necessary, adopt countermeasures.	Compliance was confirmed after the inspection.
Technical guidance note 2.1.4 (b),	Health	The yard conducts regular medical monitoring of its employees. When asked to show medical monitoring reports, these were readily available and presented on site to the evaluators. The periodical health check is required by national law for all employees including management, due to the classification of the workplace as "very hazardous". A health check is conducted when a new employee starts and then followed up annually. It includes, x-ray of lungs, hemogram, lead in the blood, liver and kidney test. On-site workers have additional blood test every 3 months as required by Turkish law. The last check was delayed due to Covid-19.	Compliance was confirmed during the inspection.

2.1.4 Technical guidance note 2.1.4 (b), MEPC 210(63) 3.1.1 (5), (7) and (8).	ISO / management system / QMS	The facility is ISO 9001, ISO 14 001, ISO 30 000 and ISO 45 001 certified by Lloyds Register. Document control is conducted with the necessary revision- and approval dates, management signatures and other formalities in order. The facility has a quality management system responsible, which was newly hired at the time of the site inspection to overlook the ISO 9001. Before the hire, the ISO 9001 was handled only by the environmental engineer. The evaluators were informed that the QMS work is maintained by these two roles, and document control is conducted in a Onedrive folder which both have access to. Spot checks were conducted during the inspection and all documents asked for were readily available either in the Onedrive folder or hard copy organised in a very structured way, e.g. management review meetings, corrective actions, accidents and incidents. The facility is subject to annual survey and audit by Lloyds Register. The evaluators were shown the Corrective Prevention Action Form Follow up list, including the corrective actions listed from the latest audit by Lloyds Register (May 15th 2020). The form had listed 10 non-conformities. The facility seems to have created a system to follow up on non-conformities and corrective actions. The environmental engineer has left the company after the site inspection. The QMS system is now only handled by the quality management system responsible which has less experience.	Compliance was confirmed during the inspection.
ILO SHG p21-23, p138:18.1, 18.3, p139:18.5	Workers facilities	The workers have access to toilets, showers and wardrobes as outlined in the ILO guideline 'Safety and health in shipbreaking Guidelines for Asian countries and Turkey' (ILO SHG). There is one dormitory on site, with a capacity of housing 3 people at the same time. There were two people living there at the time of the site inspection. The dormitory is in line with the 'ILO Helpdesk Factsheet No. 6 Workers' housing. The rest of the workers are going back to their home at the end of the day by buses	Compliance was confirmed during the inspection.

		provided by the facility. Sufficient facilities for eating were seen. Lunch is served every day, prepared by an in-house cook. Adequate supply of drinking water is available as outlined in 18.2 of the ILO SHG. There is no public water supply at the facility, so water is transported on-site and stored in a 14 tons water tank located outside of the canteen. Drinking water supply was abundant throughout the site, as well as smoking areas. The water arriving on site is of drinking water quality according to national standards and tested before it arrives. The water tank is disinfected with ozone every 6 months. The water is not tested on-site. It was recommended that the yard ensure regular testing of the water in accordance with testing requirements for stagnant water. Stagnant water allows for incubation of biological activity, due to the decay of disinfectants and can lead to growth of unwanted bacteria including Legionella which can be spread in showers. Plate count tests are normal for stagnant water in the EU. The applicant was invited to provide further details in this regard, however no response was provided.	
Article 13 (1) (e) it prepares a ship recycling facility plan			
Technical guidance note 2.1.2	SRFP	The applicant has revised its SRFP several times during the application process. The SRFP forwarded upfront of the site inspection, was partly updated during the site inspection. The SRFP is the cornerstone document of the ship recycling facility and should fully describe the operations and procedures that are in place at the facility to ensure compliance with the EU Ship Recycling Regulation. Prior to the site inspection, the evaluators had access to SRFP V.6 dated 10.04.2019. During the site inspection the facility showed an unofficial update of the SRFP (V.10). After the site inspection the applicant forwarded V.12 of the SRFP (dated 16.09.2020), but the appendices were not included.	Compliance was partly confirmed during the inspection.

		The format and content were seen as improvements, however the SRFP was still observed to be more targeted to third parties, than to the facility itself. The applicant was advised to revise the SRFP and include chronological detailed instructions on critical processes, clarity and consistency, writing instructions once, according to what is done in the facility's day to day operations. This relates to all areas as specified in this report and in particular to the hazardous waste management procedures. In response to the draft report, the applicant replied that the advices were completed. The SRFP has been updated to include procedures and instructions. However, the evaluators still consider the updated SRFP V13 to be more targeted to third parties, than to the facility itself, it is not clearly indicating who is responsible for the various tasks, nor what is to be done and by whom. Several places throughout the SRFP, references are made to roles and responsible that are not listed in the organizational chart. [redacted]	
MEPC 210(63) Section 3.1.1 (1)	Ownership	Ege Gemi Söküm was established in 1988 and started with ship recycling in 1990. It is a family owned establishment.	The desk assessment showed compliance with this point.
MEPC 210(63) Section 3.1.1 (3), (4)	Facility organisation	The facility organization in the SRFP version 6 was outdated at the time of the site inspection, and a new chart had been compiled. An updated organization chart was presented during the inspection. The updated chart shows the overview of who in the management are responsible for which workers and worker groups. The updated written organizational chart was provided to the evaluators after the site inspection. The environmental engineer has left the company after the site inspection and appears to	Compliance was confirmed after the inspection.

		have been replaced by an HSE Engineer. The environmental engineer was partly responsible for the QMS system. From the organisation chart it seems that the HSE Engineer is not involved in the QMS system.	
MEPC 210(63) Section 3.1.1 (4)	Roles and responsibilities	The organization's roles and responsibilities did not match the organization at the time of the site inspection. The evaluators recommended to develop a set of own job descriptions matching the organisation and the real work performed and make them clear and readable. In response to the site inspection, an updated version of the SRFP was provided (V12). On page 11, a table with roles and responsibilities of key personnel is included. The table only lists seven positions/roles. The job descriptions are very brief, and the evaluators question why the 'SR Operation' manager is not included as part of this list as he is responsible for both the field responsible and the ship responsible. In response to the draft report after the site inspection, the applicant provided updated job descriptions in the SRFP V13 and corresponding appendices. In the SRFP, the included job descriptions seem to be taken from the bullet point list in each of the specific job descriptions included as appendices. It is very difficult to read as it is in the SRFP V13. The job descriptions are seen as an improvement. However, for some of the roles listed in the organisational chart, a job description is still missing. A job description is missing for the HSE Engineer. Also, the environmental engineer is listed as the responsible person for several of the procedures and tasks in the SRFP and documentation provided after the site inspection. Based on the provided information, the evaluators cannot see that the applicant has provided an adequate overview of the roles and responsibilities at the facility.	Compliance was partly confirmed during the inspection.
MEPC 210(63) Section 3.1.1 (6)	Policy	The facility has a recycling policy, outlined in Appendix 2 referred to in the SRFP.	Compliance was confirmed during the inspection.

	Working hours and annual leave	The employees work 45 hours a week. Working hours are from 08.30-17:00 Monday-Friday and 08:30 to 16:30 on Saturdays. The workers get one-hour lunch break. Since the COVID-19 outbreak, the facility has taken some additional measures, e.g. the workers are divided in two lunch groups, one from 12:00 – 13:00 and the other from 13:00 – 14:00. By Turkish labour law, all employees who have worked for at least one year, including the probation period, are entitled to paid annual leave; and leave periods, which is determined according to employee's length of service: 1 to 5 years (included) 14 working days 5 to 15 years 20 working days 15 years (included) or longer 26 working days Interviews with employees on-site confirmed a practice per Turkish labour law. The evaluators cross-checked this with the social security information and all workers are payed. The Turkish authorities have enforced a law which protects the workers due to Covid-19, and the employer cannot dismiss workers. The number of workers at the facility was 35 at the time of the site inspection. Since the COVID-19 outbreaks, the evaluators were told that the facility had to let 10 people go. However, it was emphasized that these had left out of free will.	Compliance was confirmed during the site inspection.
	Contracts and minimum wage	[redacted]	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.1.1 (7)	Instructions and procedures	Considering the comments on the SRFP in this report, and the detail comments in each discipline, the procedures should be improved in presentation and detail, tidied up in the form of useful, practical instructions for workers.	Compliance was partly confirmed during the inspection.

		During the inspection it became clear that the instructions and procedures in the SRFP V12 are partly detached from what is going on in the field, observed while interviewing workers on-site. Tank cleaning is described in the SRFP 3.4.4.1 'Spill prevention, control and countermeasures'. The section includes references to several appendices. The description provided in the section is somewhat different from what the evaluators were explained on-site, e.g. foam is used for cleaning of tanks but no information on this could be found in the procedures. There were no detailed instructions on how to protect the sediment, soil and water during primary cutting. There were no descriptions of debris control or slag collection. The applicant was advised to update its procedures with step by step detailed instructions. In response to the draft report after the site inspection, the applicant provided updated procedures in SRFP V13 and explained that procedures and instructions on primary cutting and slag management have been prepared and instructed to the workers in trainings. The evaluators have the following comments: - A section on slag management procedure is included in the updated SRFP V13. The Field Manager is listed as the responsible for the implementation of the procedure, and the Environmental Engineer as the responsible for the control of the application. However, the evaluators cannot see that an Environmental Engineer is included in the updated organizational chart nor the updated job descriptions. Furthermore, the activity is reportedly recorded by the management systems responsible via the field cleaning record form. The evaluators cannot find an example of the field cleaning record form. Based on what is included in the slag management procedure, it does not include who is to perform/carry out the slag collection. In the procedure it is included who is implementing, who is controlling and who is recording, but not who is actually performing the	

		collection. A section on transportation and recovery procedures is included, but it does not describe who is responsible. - A section on primary cutting precautions is included in the updated SRFP V13. It is mentioned that the field and ship officials are responsible for the implementation of the methods. A reference to the Environmental Engineer is also made here. However, as previously mentioned, this is a role that is not part of the organizational chart. The information included in the section is written more for third parties than for the workers. It does not include how, nor by whom each step is to be completed. - In the draft report, the applicant was informed that procedures and instruction about debris control and periodic beach cleaning must be included in the SRFP. Debris control is mentioned in the updated SRFP, but it cannot be considered as a sufficient instruction. It refers to a document that is not included as part of the documentation. Beach cleaning procedures are not included.	
MEPC 210(63) Section 3.1.4	Project management progress reporting	The facility had no formal project management or progress reporting but follows the Turkish authorities' requirements as described further in this report.	Compliance was confirmed during inspection.
Article 13 (1) (f): it prevents adverse effects on human health and the environment, including the demonstration of the control of any leakage, in particular in intertidal zones;			
Technical guidance note 2.2, 2.2.1, p8: footnote (26), 2.2.2 (f), MEPC 210(63) Section 3.4.4.3/BC TG: p13: Table 1, p33: Table 5, p44: 4.1 / ILO SHG: p65: 7.2.4.4	Intertidal zone Control of leakage Preventive actions	Primary cutting is mainly above water. There is hardly any tidal range in Aliaga. The range is between 25-45 centimetres. During the inspection, there were no detailed instructions on how to protect the water and sediments, and no detailed dismantling or cutting procedure: - The SRFP part 3.4.4.3 addressed "Debris prevention and control". The part explained that the facility has procedures and checklists in place to prevent oil pollution, dust and loose items to soil and sea. The section refers to Appendix 8, containing checklist for daily environmental monitoring checklist, as well as	Compliance was partly confirmed during the inspection.

		checklist for heavy rainfall. During the site inspection the evaluators were explained that debris from shore are collected daily in the morning. Reportedly, [redacted] is responsible for this. However, this was not reflected in the SRFP. - The applicant uses steel plates to transport cut blocks to the secondary cutting zone. It was not completely clear to the evaluators if the steel plate is used below the drainage line. The applicant was requested to clarify. - The applicant has extended its concreted area towards the sea. The applicant was invited to further describe how it is ensured, in the newly concreted areas below the drainage line, that slag and paint chips are not washed to sea in rainy weather. - Based on the interviews of some of the workers, the primary cutting is not completely clear. The evaluators witnessed slag collectors/steel baskets on-site. However, it was not clear to the evaluators whether they are being used during primary cutting operation. - During the site inspection, the evaluators saw the facility had deployed an oil boom partly at the aft part of the vessel, but its effectiveness was questionable. The facility was advised that oil booms must be functional. - The facility has a procedure, personnel and equipment for emergency response to acute oil pollution, with additional assistance from SRAT/ local port emergency response units. During a prior site inspection at SRAT, the evaluators observed an oil filter curtain boom. EPRP oil booms were found on the field, in containers. This is adequate. In response to the above, the applicant replied that no cutting operation is carried out above water in their facility and that detailed and explanatory instruction is located in the SRFP_13 section 3.3.6.2 Precleaning and dismantling, subsection Primary cutting precautions: - The evaluators cannot find a section 3.3.6.2 in the updated SRFP, however the	

		evaluators assume the applicant is referring to information under 3.2.6.2 on page 107. The instruction has reportedly been given to the related workers in a training format. - The evaluators find the received documentation a bit unclear. It is not clear to the evaluators if the applicant will be able to pull a vessel beyond the drain line before any cutting starts. Normally some load must be taken off, prior to pulling beyond the drain line. Although it is easier to take environmental precautions when cutting above concrete ground than above water, in rainy or windy weather slag may be drained to sea. The evaluators could not find a reply on how the applicant handle this in the received documentation. - The updated SRFP includes section 3.4.4.3. Debris prevention and control. This section refers to 3.5.4.1 which reportedly describes '*methods of collection and cleaning of residues and slag from scrap ship primary and secondary cutting operations'.* However, the evaluators cannot find this section in the SRFP. - In response to the draft report, the applicant provided an updated SRFP V13 that includes a section on "Primary Cutting Precautions". [redacted] This section is a bit unclear. Reportedly: '*Primary cutting block pieces will not be down into the area between the loophole and the shore'*. The evaluators understanding is that no blocks from primary cutting will be placed on the ground in this area. This area in concreted but is not equipped with drainage. The evaluators understanding is that the applicant may use steel plates in this area. The primary cut blocks may be placed on steel plates below the drain line and pulled beyond the drain line to the secondary cutting area. It is not clear to the evaluators if the steel plate is completely free of hazardous materials. The evaluators could not find a response to the usage of steel plates in this area in the documentation received. - The evaluators could not find a reply to oil booms in the received documentation	

		nor by searching through the SRFP. The applicant is requested to update the SRFP with practical instructions to workers on the issues addressed above.	
Article 13 (1) (g) (i); the containment of all hazardous materials present on board during the entire ship recycling process so as to prevent any release of those materials into the environment; and in addition, the handling of hazardous materials, and of waste generated during the ship recycling process, only on impermeable floors with effective drainage systems;			
Technical guidance note 2.2.2, MEPC 210(63) Section 3.3.4.3 / BC TG: p78ff: 5.3, p67: figure 6	Cutting areas	Sections cut from the vessel are transported by crane or by a steel plate pulled by an excavator to the secondary cutting areas. The secondary cutting area was observed on-site to be in open air, on concrete flooring, with drainage. During the site inspection, the applicant emphasized that the double bottom is never dismantled below the drainage line. The vessel being dismantled at the time of the inspection was partly pulled beyond the drainage line. The vessel is cut in sequences, starting with the forward part of the vessel. The evaluators were explained that every morning the SR operation manager, ship responsible and ship cutter are deciding the daily cutting plan.	Compliance was confirmed during the inspection.
Technical guidance note 2.2.2, MEPC210(63) Section p34: 3.4.4.1	Drainage	The facility has two drainage lines running across the plot, connected with a drainage line running alongside the plot on the right-hand side (looking towards the sea). The drained water is collected in two storage tanks, one with 40 cubic metres capacity and one with 25 cubic metres capacity. The entire plot is covered in concrete. The area between the last drainage line and waterfront is covered with concrete. The facility also has a drainage line from the temporary waste storage rooms, running in an angle parallel to the warehouse building on the right-hand side of the plot (looking towards the sea). There is a 1x1 metres collection area for the drainage water, which may be pumped out by a portable pump and a 1x1 metres "dangerous waste tank".	Compliance was confirmed during the site inspection.
Technical	Waste and	Waste and hazardous waste is temporarily stored on site. Several hazardous waste rooms	Compliance was

guidance note 2.1.4, 2.2.2, 2.2.3, 2.2.5, 3.5, MEPC 210(63) Section 3.4.2.5 / BC TG 3.1, 3.3, 3.4.3, 4.1, 5.1, 5.2 (Zone D), 5.3 (Zone D), p92, Table 11	hazardous waste storage	were observed on-site. The rooms had concreted floors and walls and were roofed. The rooms were ventilated and locked. The facility stores steel, non-ferrous materials, machinery and other equipment on-site. During the inspection, it was observed that storage areas had concrete flooring. It is understood that the applicant tries to resell equipment and store it temporarily.	confirmed during the inspection.
Article 13 (1) (g) (ii): that all waste generated from the ship recycling activity and their quantities are documented and are only transferred to waste management facilities, including waste recycling facilities, authorised to deal with their treatment without endangering human health and in an environmentally sound manner;			
Technical guidance note 2.1.4, 2.2.2, 2.2.3, 2.2.5, 3.5, MEPC 210(63) Section 3.4.2, 3.4.3/ BC TG p11, p12, p48ff: 41, p50ff: 4.2,	Waste management	It is a requirement that all wastes generated from the ship recycling activity are properly documented. The 2016 Technical Guidance clarifies this further in section 2.2.2, where it is written: All elements separated from the ship, including large blocks, constitute either 'hazardous materials' or 'waste generated during the ship recycling process'. Main engines, generators and other type of machinery, gyros, signal lights, radio equipment, radars etc. are stored on-site and resold to the second hand marked if possible. Firefighting foam on-site was not taken from a vessel but provided by a Turkish producer. During the inspection, the facility presented a procedure, developed in cooperation with SRAT, of materials that can be resold. The procedure was found adequate and did not contain items that are expected to contain hazardous materials.	Compliance was confirmed during the inspection.
Technical guidance note 2.1.4, 2.2.2, 2.2.3, 2.2.5, 3.6, MEPC 210(63) Section 3.4.2, 3.4.3/ BC TG p11, p45ff: 7. / 4.2	Waste disposal	The facility takes the services for waste disposal by SRAT like most other facilities in the ship recycling area in Aliaga. The traceability of waste is ensured through satellite-based tracking system of the waste trucks called MOTAT. Please refer to Article 15(5) below.	Compliance was partly confirmed during the site inspection.

Article 13 (1) (h); it establishes and maintain an emergency preparedness and response plan; ensures rapid access for emergency response equipment, such as fire-fighting equipment and vehicles, ambulances and cranes, to the ship and all areas of the ship recycling facility;			
Technical guidance note 2.1.3, MEPC 210(63) Section 3.3.5/ BC TG p3, p5/6, p47, p56, p63/64/65/66/67, p70, p81, p83, p87, p89/ ILO SHG p32: 4.6, p 49: 7.1.8, p 128:16.	Emergency preparedness and response plan	An updated Emergency Preparedness and Response Plan (EPRP) was seen on-site, and briefly discussed during the site inspection. During the time available for discussing the EPRP, the evaluators were explained that the EPRP was updated to include Covid-19 measures. Based on the content seen on-site, most of the EPRP seemed adequate. The explanation of how to treat persons falling from height was unclear. It was described that they would put the person in a recovery position. Later it was explained that the doctor is to be called, and not to touch the person. In response to the draft report, the applicant provided the updated EPRP. On the front page of the EPRP, it shows that [redacted] – Occupational Safety Specialist has prepared the EPRP. The evaluators assume he is from [redacted] The evaluators were explained that different emergency response drills are carried out at the facility regularly, and the evaluators have witnessed some records of drills being performed. In the contact information list, it is important to continuously update the document to include the correct persons and corresponding contact information, e.g. EPRP page 58 still lists the Environmental Engineer in the emergency response team. The evaluators recommend that the applicant ensures that the updated EPRP is well implemented on-site.	Compliance was confirmed after the inspection.
Technical guidance not 2.2.4, MEPC 210(63) Section 3.2.1	Emergency access routes	Emergency access routes and assembly station were marked. The access route to ships for ambulances and fire trucks was seen to be good during the inspection.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.2.1	Access and logistics within	The main accessways were open and tidy, with good logistics. However, it was observed that little actual work was going on during the inspection and that the plot had been	Compliance was confirmed during the

	facility	tidied and cleaned prior to the inspection. The evaluators presume the applicant continuously ensures good logistics within the facility to ensure that the amount and size of heaps of scrap waiting to be sold do not clutter accessways. It was noted that [redacted] commented in April that the facility had accumulated too much scrap metal on-site. Reportedly the scrap metal was left to accumulate due to low steel prices making the sale of this material less attractive.	inspection.
Technical guidelines 2.1.4 (b), MEPC 210(63) Section 3.2.1, 3.3.5, ILO SHG, Section 3.6	Medical services and facilities	The facility has access to a well-equipped first aid room at SRAT with doctor and nurse. Hospitals and private medical services are available in the city of Aliaga, close by. The EPRP includes the phone numbers to two hospitals: Aliaga State hospital and Menemen State Hospital. Map checks confirm distance of the hospitals to be 8 and 30km respectively. The Aliaga hospital is equipped with a trauma unit. Izmir has even more advanced hospitals (severe burn unit) and medical helicopters/flights are available if required. The facility had a first aid room, located in next to the mustering point behind the administrative building.	Compliance was confirmed during the inspection.
Technical guidelines 2.1.4 (b), MEPC.210(63), Section 3.3.1, 3.3.4.11	Regulatory requirements health and safety	Turkish Occupational Health and Safety Law (No. 6331, published: 30.06.2012 / Official Gazette No. 28726) requires every company to contract an occupational health and safety expert and a company doctor based on the company's hazardous class. Depending on the number of workers on site, the minimum time that the doctor should spend at a company is defined in the respective regulations (at least 15 minutes per worker per month for very hazardous establishments). The facility has contracted the external provider [redacted] for this service. The OHS Expert spends the required time as specified in the Turkish requirements on-site. Reportedly the OHS Expert talks directly to workers about non-conformities observed on-site. The evaluators also witnessed observations made by the OHS Expert on-site.	Compliance was confirmed during the inspection.

Article 13 (1) (i) it provides for worker safety and training, including ensuring the use of personal protective equipment for operations requiring such use;			
Technical guidance note 2.3.1	Safety inspectors on site	According to the updated organizational chart, the Environmental Engineer is responsible for safety on site. Based on the information provided during the site inspection, the Environmental Engineer is responsible for the safety instructions and training. No-one else in the organisation has reportedly any formal responsibilities for safety. During interviews it appeared that the Ship Responsible and Field Responsible are responsible for the safety on the ship and on the field, respectively. When asked to see their job descriptions on-site, it was noted that their responsibility for safety was not mentioned. The facility is assisted by the OHS Expert from [redacted] to conduct training for the workers. Daily safety appeared to be enforced by the Environmental Engineer, together with the Ship Responsible and Field Responsible, while safety was controlled by both announced and un-announced inspections by an external provider [redacted]. The facility must have this service by law. The provider [redacted], is servicing many of the recycling yards. During interviews on-site it became clear that the Environmental Engineer, responsible for safety, must be better supported by management and sufficiently empowered to be able to conduct their tasks, e.g. it was stated that this person is not allowed to board a vessel due to her own safety. It was questionable if a HS system is fully established and implemented at site. The applicant was recommended to ensure they have sufficient and empowered safety personnel, working with the workers, creating a positive attitude, with the collective understanding that everybody else's safety is also own safety. The applicant was asked to make sure that they have sufficient resources and that it is clearly defined and included in the applicable job descriptions. In response to the draft report, the applicant provided updated organizational chart and job descriptions. Reportedly, the HSE Engineer is mainly the responsible for following up	Compliance was partly confirmed during the inspection.

		the OHS precautions at the facility. The safety measures are monitored by the HSE Engineer who reportedly is supported by the Operation Responsible, Ship Responsible and Field Responsible The evaluators cannot see that e.g. the job descriptions for the Operation Responsible, Ship Responsible and Field Responsible include safety on site explicitly as their duties and responsibilities. [redacted] Based on the additional documentation received it is still not clear to the evaluators how safety is enforced on site.	
Technical guidance note 2.3.2	Condition of safety equipment	Safety equipment was in general found in good condition. Spot checks of the periodical test for e.g. the human basket and cutting basket were found in good order.	Compliance was confirmed during the inspection.
Technical guidance note 2.3.3, MEPC 210(63) Section 3.1.2/3.2.2	Safety induction and training, employees	A new-employment training scheme was in place. The training scheme was set-up by the Doctor and OHS Expert from [redacted] together with the facility.	Compliance was confirmed during inspection.
Technical guidance note 2.3.3, MEPC 210(63) Section 3.1.2/3.2.2	Safety induction and training, subcontractors	Sub-contractors are reportedly not used on-site.	N/A
Technical guidance note 2.3.3, MEPC 210(63) Section 3.1.2/3.2.2	Safety induction, visitors	During the inspection the evaluators were not subject to induction training upon arrival. Upon arrival the security guard took the evaluators signatures and a temperature check was conducted (as a Covid-19 measure). No access card was provided to the evaluators. Before going on-site, the evaluators were told to walk on the marked pathways and the assembly area was shown. The evaluators recommended that the facility prepares a short induction course for visitors to make them aware of risks and danger at the facility. In response to the draft report, the applicant has reportedly prepared a briefing for visitors as a presentation. A	Compliance was confirmed after the inspection.

		copy of the presentation was included as part of the appendices and considered an improvement. The evaluators recommend including the following: - Key contact persons, including contact information - Key emergency numbers (e.g. fire, ambulance etc.) - Examples of warning signs - List of typical risks and danger	
Technical guidance note 2.3.3, MEPC 210(63) Section 3.1.2/3.2.2	Risk Assessment	Job hazard assessment is described in SRFP section 3.3.3 (page 41). The applicant has a risk assessment prepared by [redacted]. Reportedly new risks are added, and the risk assessment revised as required.	Compliance was confirmed during the site inspection.
MEPC 210(63) Section 3.1.2	Hazardous waste handling training	In the application form and in the SRFP the applicant states that SRAT personnel removes all hazardous waste. However, during the inspection it was explained that hazardous waste is also handled by the facility's own workers, including removal of asbestos. When asked if the workers had been trained the yard replied that they had not been trained. To be able to confirm compliance on this issue the applicant was requested to ensure adequate training of its own resources handling hazardous waste. In response to the draft report, the applicant has explained that the facility employees have been given the necessary training for handling, managing and temporary storage of hazardous waste. Training certificates, dated October 2nd, 2020, were provided for nine of the facility workers, e.g. the waste management and storage responsible, tank cleaning team (2 workers), ship responsible, HSE Engineer and management systems responsible. According to the provided documentation, this was a one-hour course. Based on the information currently available to the evaluators the duration of the course appears to be a bit on the low side compared to content to be covered in the course. According to the information received in the updated SRFP, the facility workers are mainly involved in removing hazardous waste contained in sealed equipment e.g. lead acid batteries, removal of paint in sealed containers etc., hence the training can be considered sufficient. The applicant must continuously ensure that its workers are trained for the hazardous	Compliance was confirmed after the site inspection.

		materials they will handle.	
MEPC 210(63) Section 3.3.5	Ship access control	[redacted]	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.5	Prevention of falling from heights	Working at height training was in force and safety harnesses used.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.1.8	Safety signage on site	Safety signage on site was abundant. Much of the signage was seen to be new. The facility was recommended to ensure that signage is properly used, e.g. it was observed that safe for hot work signage were placed in the secondary cutting zone. Please refer to the safe for hot work section later in this report.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.1.8	Safety signage on vessel	During the site visit, different safety signage was observed placed in front of the vessel and onboard the vessel. Please refer to the safe for hot work section later in this report.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.6	Lifting equipment and instructions	All lifting equipment including cranes, slings and shackles are periodically tested and certified by [redacted] a recognised supplier in Aliaga. The latest reports were from 28.07.2020. All equipment appeared to be inspected and verified within one day's work, according to the certificates. A proper inventory list of lifting equipment such as slings, shackles, steel ropes with their carrying capacity was seen on-site. The facility had implemented a traceable system, spot checked on-site and found in order. The facility has loader, cranes and excavators. All test records were spot checked e.g.: • [redacted] • [redacted]	Compliance was confirmed during the inspection.

		[redacted] The weight the crane can lift will be less than the capacity and will differ with different boom length and angles. The equipment on site is identical to the equipment listed in the SRFP. The procedures on certification of lifting equipment in the SRFP were found to be implemented on-site.	
MEPC 210(63) Section 3.3.4.6	Crane operators' certification	Checked during the desk assessment.	The desk assessment showed compliance with this point.
MEPC 210(63) Section 3.1.2	Training of forklift operator	N/A	N/A
MEPC 210(63) Section 3.1.2	Certification/ training of cutters	Training of cutters was found in order.	Compliance was confirmed during the inspection.
MEPC 210(63) 3.4.3	Cutting procedures	The updated organization chart shows that the Field Responsible is responsible for the field cutters, whereas the ship responsible is responsible for the ship cutters. Both of them report to the SR Operation Manager. [redacted] [redacted] The SRFP includes descriptions on block dismantling, lifting and moving. However, these descriptions are more narratively written than descriptive. They do not include who is responsible for the different steps. The descriptions of the cutting process as explained by the workers on site to the evaluators during the site inspection, do not entirely coincide	Compliance was partly confirmed during the inspection.

		with the descriptions in the SRFP. The applicant was requested to update its SRFP with detailed cutting procedures according to how they do it on site. It was also recommended to include the operational personnel on-site for the updating. In response to this request the applicant explained that the cutting is in accordance with the procedure titled P-43 Ship Recycling Plan in Appendix 1. The evaluators cannot find any descriptions on cutting in this procedure. The applicant must prepare detailed instructions to be included in the SRFP and ensure they are fully implemented before compliance can be confirmed.	
MEPC 210(63) Section 3.3.4.3 / ILO SHG: p108ff:13.	Steel cutting machines	Gas cutting torches are used throughout.	Compliance was confirmed during the inspection.
ILO SHG: p108ff:13.	Other machinery	The generator was seen in working condition on-site. This is used in the event of power outage.	Compliance was confirmed during the inspection.
ILO SHG: p67:7.2.4.4, p108ff:13.	Winches, mooring gear	The facility has two winches that are used to pull the vessels on shore. The evaluators were told that the chains are transported by the loaders/excavators to the winches, and the workers are connecting the mooring chains to the winches. The winches are operated from the outside, through two open holes in the fences surrounding the winches. The chains used for pulling operations are periodically checked every three months. The evaluators experienced that the applicant has developed and implemented a traceable system for the involved equipment.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.6.	Ropes/chains/ slings	Slings and shackles were identifiable. The evaluators experienced that the applicant has developed and implemented a traceable system for the involved equipment. The equipment was marked, and the facility has a container where they store spares. The evaluators witnessed the system the applicant has for periodical tests of the	Compliance was confirmed during the inspection.

		equipment. The evaluators performed some spot checks, which were found adequate.	
MEPC 210(63) Section 3.3.4.8	Maintenance and decontamination of tools and equipment	In general, little housekeeping was observed on equipment and tools during the site inspection in way of cleaning and tidiness.	Compliance was confirmed during the inspection.
ILO SHG 16.1.6	Eyewash	Eyewash solution bottles were seen posted at several locations on-site. The eye-wash solution bottles were new and completely filled. It was recommended that the facility checks the Material Safety Data Sheet (MSDS) of the various paints and chemicals they handle on-site. In many MDSD the first aid required is 15 min of continuous eye flushing. Eyewash bottles typically hold less than a litre of water, which would supply the user with flushing fluid for less than 1 minute. Hence eyewash bottles do not provide an adequate amount of flushing fluid and cannot be considered a primary means of protection. Eyewash stations must be kept clean. Although the applicant has several eye-wash bottles on-site, the evaluators questioned whether it is sufficient for continuous eye-washing for 15 minutes. The evaluators suggested that the applicant may reuse an eyewash station found on board a vessel to be dismantled. In response to this the applicant informed that they have placed additional eyewash bottles at the eyewash stations and on additional places. Further documentation was not provided in this regard, e.g. photos or an updated plan showing the locations.	Compliance was partly confirmed during the inspection.
MEPC 210(63) Section 3.3.4.8	Condition of electrical equipment	The electrical equipment, connections, plugs etc. were seemingly intact.	Compliance was confirmed during inspection.
MEPC 210(63) Section 3.3.4.7	Housekeeping and illumination	In general, fair housekeeping was observed during the site inspection, in way of cleaning and tidiness. However, it was observed that little actual work was going on. Illumination of stores, workshops and emergency equipment room for example, was good.	Compliance was confirmed during inspection.

Technical guidance note 2.1.3, MEPC 210(63) Section 3.3.5/3.3.6 / BC TG: p63: 4.5	Fire station	Izmir fire department has a station in Aliaga and reportedly, according to their website (*http://itfaiye.izmir.bel.tr/en/cars/1059/1206*), they have 117 fire trucks in various tonnages, 48 laddered fire trucks, 17 laddered vehicles, 56 meters hydraulic foam towers, 104 meters laddered vehicles with baskets, 2 fire trucks for industrial fires etc. At the Aliaga fire station they have among others an unmanned robotic fire engine for chemical fire response. No drills are held with the participation of the local fire brigades.	Compliance was confirmed during the inspection.
ILO SHG: p49: 7.1.7	Instructions and signage	Basic firefighting instructions and warning signage were seen to be in place.	Compliance was confirmed during inspection.
Technical guidance note 2.3.3, MEPC 210(63) Section 3.1.2 ILO SHG: 8.8	Fire station manning, fire-fighters	Selected workers are trained in basic firefighting. The facility's fire fighters will only attempt to put out minor fires. If a fire escalates, SRAT's fire team is called. If the fire runs out of control, the local fire brigade is called for.	Compliance was confirmed during inspection.
ILO SHG: p83: 8.8.8	Fire station equipment	N/A	N/A
MEPC 210(63) Section 3.3.6, ILO SHG: 8.8.11	Fire alarm system on shore	Several alarm points were observed on-site. During the site inspection, the applicant demonstrated the alarm at several of the alarm points.	Compliance was confirmed during the inspection.
ILO SHG: 8.8.11	Fire alarm system on vessel	The facility explained that fire alarms would be manually released on board in case of fire.	Compliance was confirmed during the inspection.
Technical guidance note 2.3.3, MEPC 210(63) Section 3.3.6, ILO SHG: 8.8	Fire prevention measures general	Fire prevention is monitored. The facility follows the requirements of OHSA requirements.	Compliance was confirmed during the inspection.

MEPC 210(63) Section 3.3.6, ILO SHG 13.4.5	Combustible materials and hot work	A number of sections were observed in the secondary cutting zone. The sections observed were bare steel. Reportedly all combustible materials are removed before cutting.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.4, ILO SHG 8.8.1, 13.5.2.	Condition of AC/OX lines	The conditions of hoses and connections were seen to be in order. The gas/oxygen colour codes were visible. The evaluators were told on-site that the facility has previously used bad quality gas which had resulted in a fire in a torch, but that they have changed to a better-quality LPG.	Compliance was confirmed during the inspection.
MEPC 210(63) Section 3.3.4.4	Transporting/ storing flammable gases	The applicant has an LPG tank on-site, served by the gas provider. The LPG Tank is filled by LPG semi-trailers. It is required that the semi-trailers hold a "Certificate of Conformity for Vehicles Transporting Dangerous Goods by Road" and are tracked.	Compliance was confirmed during the inspection.
MEPC 210(63): p21: 3.3.5, p23: 3.3.6	Fire hydrants	Tested and found in order. The facility has three fire pumps.	Compliance was confirmed during the inspection.
ILO SHG: p83: 8.8.10	Fire extinguishers	The fire extinguishers were spot checked on-site and found to be marked. The fire extinguishers had been filled in April 2020 and controlled in August 2020.	Compliance was confirmed during inspection.
MEPC 210(63): p22: 3.3.6, ILO SHG: p82: 8.8.3	Smoking areas	The facility has designated smoking areas. These appeared to be quite new and it appeared that smoking in the dedicated areas was not fully implemented at the time of the inspection. Some workers were observed smoking outside of these areas.	Compliance was confirmed during the inspection.
	Access control to facility; security patrols	The facility had a guarded entrance.	Access control to facility is not a requirement.

ILO SHG 8.4.2	Entrances / gates, fencing	The area was closed to the road by a gate, otherwise the regular access scheme to the Aliaga facilities was in force.	Compliance was confirmed during the inspection.
Technical guidance note 2.3.3, 2.1.4, 2.3.1, MEPC 210(63) Section 3.1.2, 3.1.4, 3.3.4.3, 3.3.6, 3.4.4 / BC TG: p3: figure 1, p84: 6.1, 6.2,	Training	The facility had a training scheme for all workers, with a list of courses and frequency. Trainings are generally conducted by Occupation and Health Manager from [redacted] together with the facility's Environmental Engineer & ISO 14001 45001 30000 Management System Responsible. Training records showing the participants were available on-site. According to the SRFP page 20, most of the hazardous waste management is outsourced to the SRAT. Onsite it was however confirmed that the facility's workers are more involved and that the SRFP does not completely reflect the actual situation on the ground. The workers participating in hazardous waste removal work were requested to be trained and the training records forwarded to the evaluators for review. In response to this the applicant forwarded documentation on a waste handling course on the 2nd of October with a one-hour duration. Please refer to Article 15 (2)(f)(ii) below in this table.	Compliance was confirmed after the inspection.
Technical guidance note 2.3.2, MEPC 210(63) Section 3.3.4.10	PPE	The use of PPE was seen to be well implemented, free and readily available as needed. A few helmets were observed to be expired. The evaluators suggested introducing a system to ensure that helmets are well within its expiry date. Reportedly, the applicant has decided to add a section for expiry date to the inventory list of PPEs. Other documentation e.g. a copy of the new list was not referenced by the applicant and could not be found by the evaluators in the received documentation.	Compliance was partly confirmed during inspection.
Article 13 (1) (j): it establishes records on incidents, accidents, occupational diseases and chronic effects and, if requested by its competent authorities, reports any incidents, accidents, occupational diseases or chronic effects causing, or with the potential for causing, risks to workers' safety, human health and the environment;			
Technical	Medical	Procedures for medical monitoring were documented. Worker accidents, injuries and	Compliance was

guidance note 2.3.4, MEPC 210(63) Section 3.3.4.11 and Appendix IV, ILO conventions	monitoring,	medical/health records such as occupational health examinations are recorded. The facility followed OSHAS and Turkish law defined as a "hazardous workplace". In general, the medical monitoring schemes were found good and well documented in organized records. Annual tests include hearing, vision, lung capacity, blood test and lung x-ray. New hires are obliged to undergo medical examination before starting work. Blood, urine and lead are tested every 3 months.	confirmed during the inspection.
	Incident monitoring and reporting	The facility had an incident monitoring and reporting in place. Asking for the reports on accidents, the facility provided detailed accident reports. Each accident is followed up by a corrective action.	Compliance was confirmed during the inspection.
	Statistics	Reportedly, the yard has not experienced a fatal accident. The past year the facility had four incidents. The applicant showed the evaluators the incident reports for each of the incidents and explained the corrective actions that had been taken due to the incidents. During the site inspection, the evaluators were informed that the facility, as part of its corrective action follow up list, work on better root cause analysis. The facility calculates the accident frequency rates and severity.	Compliance was confirmed during the inspection.
	Near-miss reporting	The SRFP did not contain information on who is responsible to keep statistics of work accidents and near miss incidents. However, during the site inspection the evaluators were told that it is the Environmental Engineer (also responsible for & ISO 14001 45001 30000 management system) that keep statistics of accidents and near misses. The applicant was requested to ensure that this was specified in the job description. However, the Environmental Engineer has since left the company and it is not known to the evaluators who has taken over this responsibility. The workers are reportedly verbally encouraged to suggest improvements in the procedures. During the site inspection, the evaluators were told that workers share suggestions for improvements during meetings with management, where selected workers are invited. The workers attending such meetings are Field Responsible, Ship Responsible, Crane Operator and Heavy Construction Equipment Operator. Such	Compliance was confirmed during the inspection.

		meetings happen once a year. The facility also has a feedback and complaint form box placed at the entrance inside of the administrative building. There are no forms in the canteen, and near miss form was mentioned to be located on the field. The evaluators were told that the facility has not received any written complaints. The evaluators suggested that a suggestion box is placed at a location where the workers can be more anonymous e.g. in the canteen or in the wardrobes. It is not known to the evaluators if the applicant has made any improvements in this regard as no reply to this point was received.	
	Non-conformance procedures	Evidence of actual non-conformance records with cases, actions and mitigations were witnessed on site. The records are kept in a shared Onedrive folder.	Compliance was confirmed during the inspection.
	HSE Incentives	No additional incentives, to regular wages, were identified.	N/A
	Corporate social responsibility	The facility's recycling policies are presented in various pages of the SRFP and in appendices.	N/A
Article 13 (2) (a): the operator of a ship recycling facility shall send the ship recycling plan, once approved in accordance with Article 7(3), to the ship owner and the administration or a recognised organisation authorised by it;			
MEPC 210(63) Section 3.2.4, 3.4.2.1	Ship recycling plan	During the inspection, the ship recycling plan for the vessel (non-EU) under dismantling was observed. It was only available in Turkish. It included an illustration of a dismantling sequence that is ship-specific with a brief description. It also included the relevant parts of the IHM and where the hazardous materials are located. The SRP was observed to be developed in accordance with the requirements of Article 7.2 of the SRR. As agreed during the site inspection, the applicant was requested to forward a copy of the SRP for the ship in question [redacted] In response to the draft report the applicant forwarded the SRP for a different vessel ([redacted]) flying the flag of a third country. It appears that the vessel did not arrive with an IHM, hence an IHM is not	Compliance was confirmed during the inspection.

		reflected in the SRP and no quantities of hazardous materials are provided. The safe for hot work and safe for entry procedures in the SRP do not coincide with the procedures described in the SRFP (e.g. oxygen level, time periods and validity of permits for safe for hot works), this is further addressed below. Based on the information currently available to the evaluators, it is expected that the facility will be able to prepare SRP in accordance with Article 7.2 for EU flagged vessels.	
Article 13 (2) (b): report to the administration that the ship recycling facility is ready in every respect to start the recycling of the ship;			
MEPC 3.2.3-3.2.6	Ready for recycling certificate	As part of the application file, the facility submitted the specific statement concerning the recycling of EU Member States flag ships (part 5 of the application). According to the signed statement, the facility will prior to any recycling of the ship — send the ship recycling plan, approved by the competent authority according to the procedure applicable*, to the ship owner and the administration or a recognised organisation authorised by it; — report to the administration that the ship recycling facility is ready in every respect to start the recycling of the ship The evaluators are of the impression that the ship recycling facility can adapt to these new legal regimes. [*Currently, there is no legislation in place in Turkey to approve SRPs according to the EU SRR.]	The evaluators are of the impression that the organisation can adapt to these new legal regimes.
Article 13 (2) (c): when the total or partial recycling of a ship is completed in accordance with this Regulation, within 14 days of the date of the total or partial recycling in accordance with the ship recycling plan, send a statement of completion to the administration which issued the ready for recycling certificate for the ship. The statement of completion shall include a report on incidents and accidents damaging human health and/or the environment, if any.			
MEPC 210(63) Section 3.2.7	Statement of completion	The facility must submit a request to the Harbour Master when the double bottom of the dismantled vessel remains. Upon verification, the Harbour Master grants permission for completion of dismantling. Upon actual completion, the facility confirms to the Harbour	The evaluators are of the impression that the organisation can

		Master that the final part of the keel has been dismantled. Subsequently, the Port Authority issues 'Statement of Completion of Dismantling', and the facility provides the 'Statement of Completion' to Customs. As part of the application file, the facility submitted the specific statement concerning the recycling of EU Member States flag ships (part 5 of the application). According to the signed statement, the facility will: "(b) when the total or partial recycling of a ship is completed in accordance with this Regulation, within 14 days of the date of the total or partial recycling in accordance with the ship recycling plan, send a statement of completion to the administration which issued the ready for recycling certificate for the ship. The statement of completion will include a report on incidents and accidents damaging human health and/or the environment, if any."	adapt to these new legal regimes.
Article 15(2) (a): identify the permit, license or authorisation granted by its competent authorities to conduct the ship recycling and, where relevant, the permit, license or authorisation granted by the competent authorities to all its contractors and sub-contractors directly involved in the process of ship recycling and specify all information referred to in Article 16(2);			
Technical guidance note 2.2.1, MEPC 210(63) Section 3.2.2	Authorisation	Updated authorisations were witnessed on-site. The authorisations are issued on a yearly basis.	Compliance was confirmed during the site inspection.
MEPC 210(63) p8: 3.1.2, p10: 3.2.2 / BC TG: p38: 3.4.3	Sub-contractors	The applicant does not use sub-contractors.	N/A
Article 15 (2) (b): indicate whether the ship recycling plan will be approved by the competent authority through a tacit or explicit procedure, specifying the review period relating to tacit approval, in accordance with national requirements, where applicable;			
MEPC.196(62) Section 5	Explicit or tacit procedure	Today the SRP is approved by tacit approval. The SRP is part of a wide set of documents, surveys and permits/licenses that are submitted to the competent authorities for obtaining permission to dismantle a ship. The SRP is neither explicitly approved nor rejected as a standalone document. The time frame is no more than 15 days according to the İzmir Governorship Provincial Directorate of Environment and Urbanization.	The evaluators are of the impression that the organisation can adapt to new legal regimes.

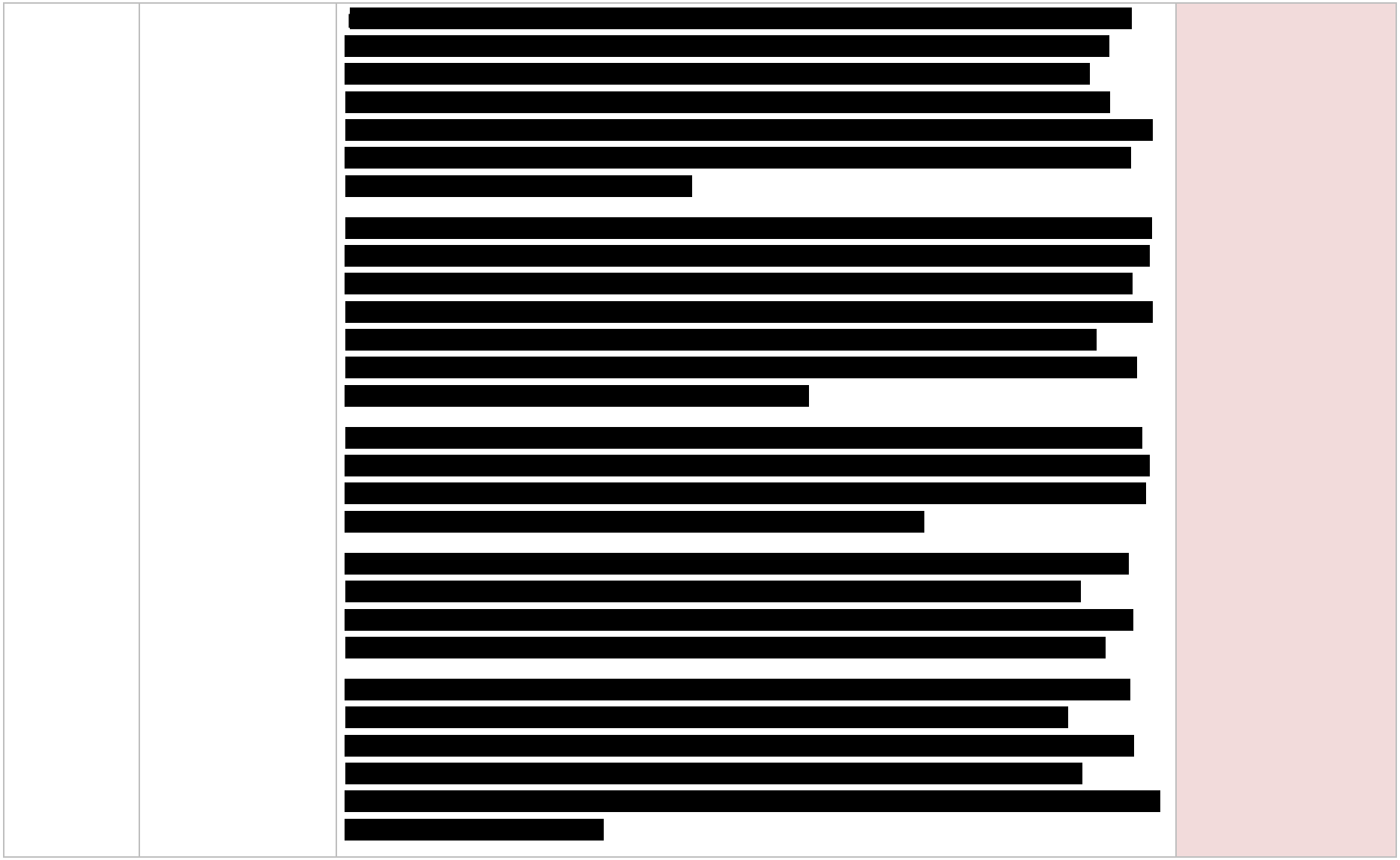
		The evaluators were of the impression that the organisation can adapt to new legal regimes with regards to approval of the SRP.	
Article 16 (2) (a): the method of recycling; (b) the type and size of ships that can be recycled; (c) any limitation and conditions under which the ship recycling facility operates, including as regards hazardous waste management; (d) details on the explicit or tacit procedure, as referred to in Article 7(3), for the approval of the ship recycling plan by the competent authority; (e) the maximum annual ship recycling output.			
	Method of recycling	The operation is by landing the vessel, and the vessel is pulled using winches. Cut pieces are lifted by crane to the secondary cutting zone, or by placing the cut pieces on a steel plate, pulled by a loader to the secondary cutting zone.	Compliance confirmed during the inspection.
	Type and size of ships that can be recycled	All types of ships, except rigs. The facility can accept ships with the following maximum ship dimensions: - Width: 49 meters - Length: no limitation - Draught: 15 meters	Compliance confirmed during the inspection.
	Any limitation and conditions	The facility can accept all types of ships, except rigs, with a width limitation of 49 m. They prefer not to dismantle livestock carriers.	Compliance was confirmed during the inspection.
	Maximum annual ship recycling output	[redacted] The applicant was requested to provide the theoretical maximum annual ship recycling capacity, but no reply was received in the response to the draft report.	Compliance was confirmed during the inspection.

Article 15 (2) (c): confirm that it will only accept a ship flying the flag of a Member State for recycling in accordance with this Regulation;			
	Confirmation	Confirmation from the facility has been received that it will only accept a ship flying the flag of a Member State for recycling in accordance with the EU Regulation.	The desk assessment showed compliance with this point.
Article 15 (2) (d): provide evidence that the ship recycling facility is capable of establishing, maintaining and monitoring of the safe-for-hot work and safe-for-entry criteria throughout the ship recycling process;			
HKC: p14: R1(7), MEPC 210(63) Section 3.3.4.2 / ILO SHG: p110:13.4	Safe- for- hot work certificate, warning signs and labels	The safe-for-hot work regime is not clear to the evaluators and the facility offered different and contradicting information during the inspection compared to the procedures in the SRFP. The evaluators question the implementation on site as the Ship Responsible could not provide any information regarding validity of safe for hot works permits. Also, the safe for hot work permits issued on the day of the inspection were issued for an open cargo hold. The applicant stated on site that they have misunderstood safe-for-hot work procedures as they have issued safe-for-hot work permits for all work with torches. The applicant also stated that they may need training and that they would like to come back with their corrective actions in response to the draft report. The applicant was requested to update its procedures and describe in detail how they ensure safe-for-hot work. In response to the draft report the applicant refers to SRFP section 3.4.3.1 Safe-for-entry, Appendix-3 OHS, P-14 Permitted works procedure and F-15 Safety works permit. The updated procedures are seen as an improvement. However, the safe for hot work procedures in the forwarded SRP, for a vessel arriving after the site inspection, do not coincide with the updated procedures in the SRFP, hence the evaluators question the implementation onsite.	Compliance was not confirmed during the inspection.
HKC: p26: R19(2), BC TG: p47: 4.2.1	Confined spaces	The confined space / safe for entry regime is not clear to the evaluators and the facility offered different and conflicting information during the inspection compared to the	

		procedures in the SRFP. The applicant was requested to update its procedures and describe in detail how they ensure safe for entry into confined spaces. In response to the draft report the applicant refers to SRFP 3.4.3.1 Safe-for-entry, Appendix-3 OHS, P-14 Permitted works procedure and F-15 Safety works permit. The updated procedures are seen as an improvement. However, the safe for entry procedures in the forwarded SRP, for a vessel arriving after the site inspection, do not coincide with the updated procedures in the SRFP, hence the evaluators question the implementation onsite.	
Article 15 (2) (e): attach a map of the boundary of the ship recycling facility and the location of ship recycling operations within it;			
HKC: p43: 1.5, MEPC 210(63) Section 3.2.1	Map of facility	Multiple drawings were witnessed by the evaluators on-site, proven to correspond to the landscape and facility lay-out, containing all safety equipment and -information.	Compliance was confirmed during the inspection.
(f) for each hazardous material referred to in Annex I and additional hazardous material which might be part of the structure of a ship, specify:			
(i) whether the ship recycling facility is authorised to carry out the removal of the hazardous material. Where it is so authorised, the relevant personnel authorised to carry out the removal shall be identified, and evidence of their competence shall be provided;			
MEPC 210(63) Section 3.1.3, 3.1.4	Workers' certificates/ licences	Multiple certificates have been witnessed by the evaluators, however training certificates of workers involved in removal of hazardous waste were requested to confirm compliance on this point. In response to this the applicant forwarded, as previously mentioned, documentation that some workers had participated in a course.	Compliance was confirmed after the inspection.
(ii) which waste management process will be applied within or outside the ship recycling facility such as incineration, landfilling or another waste treatment method, the name and address of the waste treatment facility if different from that of the ship recycling facility, and provide evidence that the applied process will be carried out without endangering human health and in an environmentally sound manner;			

MEPC.210(63), Section 3.1.1	Regulatory requirements environment	The facility operates in accordance with the Turkish Environment Law (No. 2872, published on 11.08.1983 / Official Gazette No: 18132) and its respective regulations. Due to given special conditions, ship recycling facilities in Turkey are exempted from some of the requirements such as preparing an Environmental Impact Assessment.	Compliance was confirmed during the inspection.
Technical guidance note 2.1.4, MEPC210(63) Section 3.4.1, Appendix 1, BC TG Executive summary (p1), 4.3, 2.1, 2.5, 3.2, 3.4.2, 3.4.4, 4.1, 4.2.2, 4.2.5, 6.2, 7.1, 7.3,	Environmental management	The facility has an environmental compliance approach outlined in Section 3.4 of the SRFP. On-site it was questionable if this is implemented on-site and contradicting information was received in this regard (e.g. who removes hazardous materials, including asbestos). The applicant was requested to ensure that the SRFP is updated and that it properly reflects the actual environmental management at site. In response to this the applicant refers to SRFP 3.5 Environmental compliance approach (assumed to be 3.4 by the evaluators) and also refers to the response provided for Article 13 (1) (i) on hazardous waste handling and Article-15 (2)(f)(ii) section on management of asbestos. The responses provided offer little detail on their environmental management. [redacted]	Compliance was partly confirmed during the inspection.
Technical guidance note 2.2.5, MEPC210(63) Section 3.4.2, BC TG: p45: 4.2, ILO SHG: p4: 2.3.2	Management of hazardous waste	[redacted]	Compliance was partly confirmed during the site inspection.

		[redacted]	
Technical guidance note 2.2.3, MEPC210(63) Section 3.4.3.1, ILO SHG p90: 9.2.3	Management of asbestos	[redacted]	Compliance was not confirmed during the site inspection.



		[redacted]	
MEPC210(63) Section 3.4.3.2	Management of PCBs	[redacted] The applicant was requested to forward updated information in this regard and to update the SRFP to reflect the actual procedure as required. According to the updated SRFP, PCB is removed by SRAT. However, as mentioned above, it is unclear from the SRP if the employees referred to are from SRAT or from the applicant.	Compliance was not confirmed during the site inspection.
MEPC210(63) Section 3.4.3.3	Management of Ozone-depleting substances (ODS)	According to the SRFP V12 section 3.4.3.3, ODS containing material are reportedly handled by SRAT. By interviewing workers on-site, it became clear that this is not the case. Hence, the applicant was requested to forward updated information in this regard and to update the SRFP. In response to the draft report, the applicant refers to the updated ODS procedure in the SRFP V13. Reportedly, ODS gas trapped in systems is removed by an authorized	Compliance was partly confirmed after the site inspection.

		refrigeration specialist, while gas bottles and insulation containing ODS are removed by facility workers. This coincides well with the information obtained on-site. The procedure is considered adequate, although it would be more relevant for workers by removing the 'good to know information' and keeping it more to the point for workers executing the tasks. However, as mentioned above, it is unclear from the SRP if the employees referred to are from SRAT or from the applicant. This must be clarified before compliance can be confirmed.	
MEPC210(63) Section 3.4.3.4	Management of paints and coating including anti-fouling with organotin TBT	A section on management of paints and coating, including anti-fouling with organotin TBT, is included in the SRFP. However, the evaluators were unsure if this is up to date. The applicant was invited to update this section in accordance with the actual operations on site. The section 3.4.3.4. 'Paints and coatings' have been updated but it is hard to follow and understand. It appears that various sentences have been misplaced e.g. section *2.* Definition Of Heavy Metals reads (page 218): *Organotin compounds (TBT) are harmful chemical compounds that are formed by tin with hydrocarbons, which protect the ship's bottom from rust and protect the ship's hulls from marine organisms. They are in the class of persistent organic pollutants (POPs)*. The title does not reflect the next paragraph. Further on the title: '*Deck and bottom paints on scrap vessels - Ni -Cd batteries and electrodes and petroleum derivatives'* is inserted. This title is not understood, and the next paragraph includes a description of something different. This section must be rewritten to be useful to workers. A description of each hazardous substance is not useful as instructions to workers. This section should focus on practical instructions for the persons executing the tasks. It should be written for workers with step by step details, not as an explanation to third parties.	Compliance was not confirmed during the site inspection.
MEPC210(63) Section 3.4.3.5	Procedures for operationally generated wastes	During the inspection it was observed that the descriptions under the relevant section of the SRFP were not in line with the information received on site. For example, the SRFP states that *Bunker Oils, bilge water and so on. wastes are collected by SRAT*. However,	Compliance was not confirmed during the site inspection.

		according to the information received on-site, SRAT is not involved in the removal of operationally generated wastes from the vessel. The applicant was therefore invited to update this section in accordance with the actual operations on site. In response to the draft report, the applicant updated Section 3.4.3.5. 'Hazardous liquids, residues and sediments (such as oils, bilge, and ballast water)'. However, the evaluators consider that this section should be further updated with practical instructions for the persons executing the tasks. It should be written for workers with step by step details.	
	Perfluorooctane sulfonic acid (PFOS)	The evaluators understanding after the site inspection is that all liquids are transferred from the vessel by the facility's workers. This is not reflected in the SRFP. The applicant was requested to update the SRFP to reflect the actual operations on the ground and that the procedure provides step by step instructions required for those executing the work. According to the updated SRFP 3.2.6.3 'Waste handling and disposal PFOS', PFOS is removed by SRAT. The applicant refers to Appendix-2 Environment, P-20 SRAT PFOS Precautions. This is contradicting the statements made during the site inspection. Although the applicant may require assistance to remove PFOS containing foam in fixed tanks, the evaluators question the necessity to call SRAT to remove smaller sealed containers with PFOS containing foam.	Compliance was not confirmed during the site inspection.
MEPC210(63) Section 3.4.3.6	Heavy metals (lead, mercury, cadmium and hexavalent chromium)	The evaluators understanding after the site inspection is that heavy metals are mainly handled the facility's workers. This was not reflected in the SRFP. The applicant was requested to update the SRFP to reflect the actual operations on the ground and that the procedure provide step by step instructions required for those executing the work. According to the updated SRFP page 114, heavy metals are removed by the facility's workers. Removal of batteries are addressed in section 3.4.3.4. 'Paints and coatings' and in section 3.4.3.6. 'Heavy metals (lead, mercury, cadmium and hexavalent chromium)'. The latter also refer to P-27 SRA heavy metals (lead - pb + crom - cr + cadmium – cd) precautions procedure, in appendix 7, and P-36 Mercury procedure, in Appendix 5. These sections in the SRFP are confusing and contain no practical instructions for workers	Compliance was not confirmed during the site inspection.

		executing the tasks. It is recommended that the paint and coating sections only describe removal of paint and that section 3.4.3.6 describe removal of heavy metals in other equipment than paint. The procedures must be written for workers with step by step details.	
MEPC210(63) Section 3.4.3.7	Other hazardous materials in Annex II	The evaluators understanding after the site inspection is that other hazardous materials in Annex II are mainly handled by the facility's workers. This was not reflected in the SRFP. The applicant was requested to update the SRFP to reflect the actual operations on the ground and that the procedure provides step by step instructions required for those executing the work. Also, the information provided under non-hazardous waste was requested to be updated. It was stated: *All garbage is collected from the vessels and grouped. All non-hazardous construction materials such as cement and ceramic will be buried in a designated garbage disposal area.* This phrase gives the impression that the applicant bury waste on its own, which is not the case. In response to this the applicant refers to the response provided for Article 13 (1)(i) section Hazardous Waste Handling. The evaluators however cannot find relevant information here, but the SRFP should give clear instructions on how PBB, PBDE, HBCDD, PCN and SCCP containing materials are removed. No reference to this could be found in the SRFP section 3.4.3.7. 'Other Hazardous Materials'. According to page 144, the facility's workers remove such equipment. Procedures for other hazardous materials in Annex II are required before compliance can be confirmed. This section should focus on practical instructions for the persons executing the tasks. It should be written for workers with step by step details.	Compliance was not confirmed during the site inspection.
MEPC210(63) Section 3.4.2.2	Additional sampling and analysis	It is unclear if any additional samples are taken by SRAT. For the vessel under dismantling (non-EU flagged) the IHM had been developed by SRAT by visual inspection only, which, in the evaluator's opinion, is inadequate, considering in particular that the IHM reports that the vessel contain 4800kg of asbestos. Hence, it was questionable if	Compliance was not confirmed during the site inspection.

		SRAT takes samples. The applicant was therefore requested to forward updated information in this regard supported with documentation. In response to the draft report, the applicant replied that SRAT conducts the additional sampling and the samples are reportedly analysed by SGS. The evaluators expected to receive sampling results to document that sampling is conducted, but no analysis reports could be found in the received documentation. Based on the limited documentation currently available, it is not possible for the evaluators to confirm that additional sampling and analysis are conducted by SRAT on a regular basis. A confirmation from SRAT would be required.	
MEPC210(63) Section 3.4.2.3	Identification, marking and labelling	According to section 3.4.2.3 'Identification, Marking and Labelling and Potential On-board Locations' in the SRFP, SRAT detects and mark hazardous materials onboard. During the site inspection it could not be confirmed that this is implemented on-site. According to interviews with several workers, no marking is done by SRAT. The applicant was therefore requested to forward updated information in this regard supported with documentation. In response to this request the applicant has forwarded various photos of marking of hazardous materials. However, it remains unclear to the evaluators if marking is done by SRAT on a regular basis. A confirmation from SRAT would be required.	Compliance was not confirmed during the inspection.
Technical guidance note 2.2.5 (a), MEPC210(63) Section 3.4.2	Transport of waste	Transportation of hazardous waste is by licensed trucks to licensed disposal facilities. All vehicles are equipped with mobile tracking device by satellite (MOTAT system) that are available to the Ministry of Environment (Çevre ve Şehircilik Bakanlığı). The waste transfer form is completed on the webpages of the Ministry of Environment.	Compliance was confirmed during the site inspection.
Technical guidance note 2.2.5 (c)	Applied process	Please refer to Article 15 (5) below.	
Article 15 (2) (g) confirm that the company adopted a ship recycling facility plan, taking into account the relevant IMO guidelines;			
		Please refer to Article 13 (1) (e) above in this table.	

Article (2) (h): provide the information necessary to identify the ship recycling facility.			
		Please refer to Article 13 (1) (a) above in this table.	
Article 15 (5): For the purposes of Article 13, with regard to the waste recovery or disposal operation concerned, environmentally sound management may only be assumed to be in place provided the ship recycling company can demonstrate that the waste management facility which receives the waste will be operated in accordance with human health and environmental protection standards that are broadly equivalent to relevant international and Union standards.			
Technical guidance note 2.2.5 (c)	Waste management facilities	The applicant stated that SRAT removes, store and ensure transportation of hazardous waste to downstream waste management facilities. Ensuring sustainable downstream management of wastes generated by the ship dismantling activities is an important requirement under the EU Ship Recycling Regulation. Section 2.2.5 in the EU Technical guidance note provides specific information on the requirements for non-EU facilities to demonstrate that the waste management facilities follow standards broadly equivalent to international and EU standards. The requirements/standards applied in the waste management facilities must ensure a similar level of protection of human health and the environment as in international/EU standards. The various international and EU standards are listed under section 2.2.5. Turkish waste regulations are broadly equivalent to EU standards with identical waste codes (EAL). Transport of waste is conducted by licensed trucks with mobile tracking device by satellite (MOTAT system) that are available to the Ministry of Environment (Çevre ve Şehircilik Bakanlığı). The waste transfer form is completed electronically on the webpages of the Ministry of Environment. According to the latest information received from SRAT by e-mail 22.07.2020, the following waste management facilities are used:	Compliance was partly confirmed during the inspection.

Waste management facilities		
Waste management company	**License from Ministry of Environment**	**Webpage**
SÜREKO ATIK YÖNETİMİ	Yes	http://www.sureko.com/
İZAYDAŞ	Yes	https://www.izaydas.com.tr/
ASLAN ÇİMENTO	Yes	http://www.aslancimento.com.tr/
ÇİMENTAŞ	Yes	http://www.cimentas.com.tr/
OSMAN SÖNMEZ	Yes	http://osmansonmez.com.tr/vizyonumuz/
BATİ ATİK	Yes	http://www.batiatik.com.tr/
DÖNMEZ VARİL GERİ DÖNÜŞÜM	Yes	https://www.donmezvaril.com/tr/
KİMTAŞ	Yes	http://www.carmeuse.eu/tr/kimta%C5%9F
BATIÇİM	Yes	https://www.baticim.com.tr/
AVŞAR DEMİR ÇELİK SANAYİ	Yes	https://www.avsardemircelik.com/
HABİTAT GERİ DÖNÜŞÜM	Yes	https://habitatgeridonusum.com.tr/
EXİTCOM – RECYCLING	Yes	http://exitcom.com.tr/
MİROĞLU ÇEVRE A.Ş.	Yes	http://www.miroglu.com.tr/
VARİLSAN.COM	Yes	http://en.varilsan.com.tr/
HAS NİĞDELİLER	Yes	https://www.hasnigdeliler.com/
SENTEZ KİMYA	Yes	http://www.sentezkimya.com.tr/
ANOXİA A.Ş.	Yes	https://www.anoxia.com.tr/
MNC AKÜ	Yes	http://www.mncaku.com.tr/
NİĞSA KABLO METAL	Yes	no website
BAŞTAŞ ÇİMENTO	Yes	http://www.bastas.com.tr/
ALÇEV GERİ DÖNÜŞÜM	no	https://alcev.com.tr/
MANİSA ENERJİ	no	no website
PAROLA ENERJİ	Yes	https://www.parolaenerji.com.tr/

Some facilities listed above were not listed in the information received during the desk assessment phase: Anoxia A.Ş, Manisa Enerji and Parola Enerji.

The evaluators have seen most of the licenses to the waste management facilities used by SRAT and the applicant. The evaluators searched for the licenses at the webpage: https://eizin.cevre.gov.tr/Rapor/BelgeArama.aspx, but licenses for 2 of the companies in the table above could not be found.

		In the context of the site inspection of the facility, the evaluators also had a separate meeting with SRAT, where the need for updated documentation regarding the downstream waste management companies was raised. **Waste management facilities used by the applicant and SRAT** It was requested that the applicant, together with SRAT, demonstrate that the waste management facilities used are operated according to standards broadly equivalent to relevant international/Union standards. In particular, a confirmation was requested that the above list over the waste management facilities, received 22.07.20, is still up to date. From the response provided the evaluators understanding is that Kent Energy has been added after the site inspection. The license was attached in the forwarded documents. It is not clear to the evaluators if the applicant and SRAT still use Alçev Geri Dönüşüm and Manisa Enerji. The evaluators have not seen the licenses issued for these two companies. All facilities (except for two) are licensed and the license have been cross-checked by the evaluators at https://eizin.cevre.gov.tr/Rapor/BelgeArama.aspx. Considering that Turkish waste regulations are broadly equivalent to EU standards, the evaluators have reasons to believe that the waste management facilities are operated broadly equivalent to EU standards. The two main waste management facilities used for hazardous waste are Sürkeo and Izaydas. Below follows some information the evaluators have from previous inspections, including additional information received from the applicant in response to the draft report: **Süreko** Süreko is an integrated waste management and waste energy facility located in the Izmir Province. Süreko is licensed to handle multiple waste streams (e.g. asbestos, fluorescent light tubes, paints and coatings). The complete overview with EAL codes can be found in their license from the Ministry of Environment. The license has previously been forwarded to the evaluators for review and is also available at Süreko's webpages.	

		Süreko has an industrial landfill and produces refuse derived fuel (RFD). RFD is a fuel produced from e.g. hazardous industrial wastes with high calorific value, for example, waste oils, sludge, impregnated sawdust and spent solvents. RFD can be co-incinerated in industrial processes e.g. in the cement industry (see further below). The evaluators visited Süreko on 6 June 2018. During the visit Süreko gave a presentation of its facilities, showed its monitoring programs and the evaluators took a site tour. At that time, it was concluded that Süreko is operating according to EU standards. Although the evaluators have, based on the currently available information, reasons to expect that Süreko follow standards broadly equivalent to EU standards, the evaluators would like to see more recent monitoring reports for this facility. **Izaydaz** Izaydas was established in May 1996 by the Metropolitan Municipality of Kocaeli and is located in the Kocaeli Province. Izaydaz has an incinerator plant. Izaydaz is licensed by the Ministry of Environment to handle multiple waste streams including POPs. The complete overview with EAL codes can be found in the license. The license was previously forwarded to the evaluators for review. The evaluators have access to the report of the GEF study (Global Environment Facility) entitled "Persistent Organic Pollutants Legacy Elimination and POPs Release Reduction Project", at Izaydaş in December 2016. The report was completed in September 2017 (https://www.Izaydaş.com.tr/defaultEn.aspx). The project was supported by the United Nations Development Program (UNDP). The overall conclusion made on the basis of the results from the test burn program was that the Izaydaş facility more than meets both national regulatory requirements and prevailing international standards when applied to POPs pesticide and high concentration PCB oil wastes. The national standards in Turkey have been harmonized with the EU waste incineration rules in respect to operating conditions, technical requirements and flue gas emission limits. Although the evaluators have, based on the currently available information, reasons to	

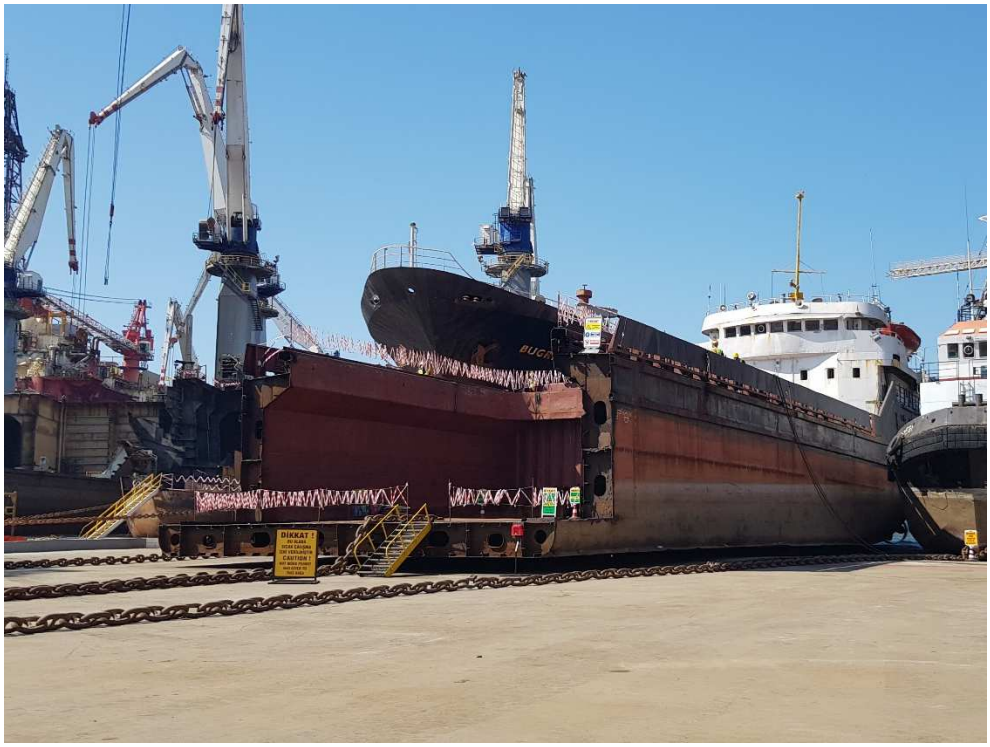
		expect that Izydas follow standards broadly equivalent to EU standards, the evaluators would like to see more recent monitoring reports for this facility. **Cement factories** Refuse-derived fuel (RFD) produced by e.g. Süreko is used in the cement kiln industry in Turkey (similar to Europe) where its co-incinerated. Emissions from the cement factories are monitored (recording devices placed on the chimney), recorded and checked online by the Ministry of Environment (emissions information "Sera gazları izleme, raporlama ve doğrulama"). These data are currently not available to the general public. The applicant forwarded a monitoring program for emissions to air by Sançim Bilecik Çimento Mad. Beton Sa. Ve Tic. AŞ in Appendix-2. The measured values generally appear to be well below the threshold values. Sançim Bilecik Çimento Mad. Beton Sa. Ve Tic. AŞ is a subsidiary company of Aşkale Çimento Sanayi T.A.Ş, providing cement in South Marmara, Northern Agean, and Central Anatolia region. According to the company's webpages, the company is audited by the Council for Quality and Environment (CQE), an economic enterprise founded by the Turkish Cement Manufacturer's Association in order to provide quality control and environmental measurement services within an impartial and transparent platform. CQE is reportedly the sole certification body of the cement industry, appointed by the European Commission as a notified body under the Construction Products Regulation (EU/305/2011) with an identification number 1784. Based on the information available to the evaluators, the on-line monitoring by the Ministry of Environment and the forwarded example of an environmental monitoring report, it is likely that co-incineration of RFD in the cement kiln industry follow standards broadly equivalent to EU standards. **Steel plants** The steel recovered from the vessel is sent to steel plants for further processing. Steel plants are regulated by "Sera gazi emisyonlarinin takibi hakkinda yönetmelik" (Regulation	

		on monitoring greenhouse gas emissions), http://www.mevzuat.gov.tr/Metin.Aspx?MevzuatKod=7.5.19678&MevzuatIliski=0&sourceXmlSearch=sera and "Sanayi kaynakli hava kirlilignin kontrolu yönetmeligi") (Regulation on control of industrial air pollution) http://www.mevzuat.gov.tr/Metin.Aspx?MevzuatKod=7.5.13184&MevzuatIliski=0& For the latter, emission limitations for dust, lead, cadmium, chlorine, hydrogen chloride and gaseous inorganic chloride compounds, hydrogen fluoride and gaseous inorganic fluoride compounds, hydrogen sulphide, carbon monoxide, sulphur dioxide, nitrogen dioxide [NOx (in NO_2)] and total organic compounds are set and monitored for compliance. The monitoring is recorded and checked online by the Ministry of Environment. Based on the information currently available to the evaluators, it is likely that the steel plants, monitored online by Ministry of Environment, follow standards broadly equivalent to EU standards.	

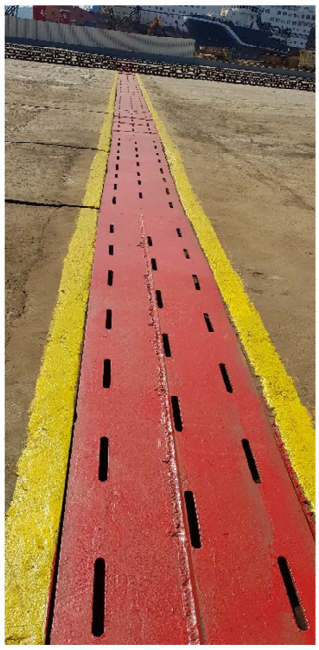
7 SUPPORTING PHOTOS FROM THE SITE INSPECTION

Clear access routes for firefighting and ambulances were observed on-site

Helmets, shoes, eye protection, gloves and respiratory masks were worn throughout the operation.



The evaluators could observe access to the vessel under dismantling is by ladder. Secondary access is by basket lifted by crane.



Drainage system runs across the plot (two main drainage lines in total, and one on the righthand side).

The drainage system is connected to two storage tanks on the right-hand side of the plot (looking towards the sea).

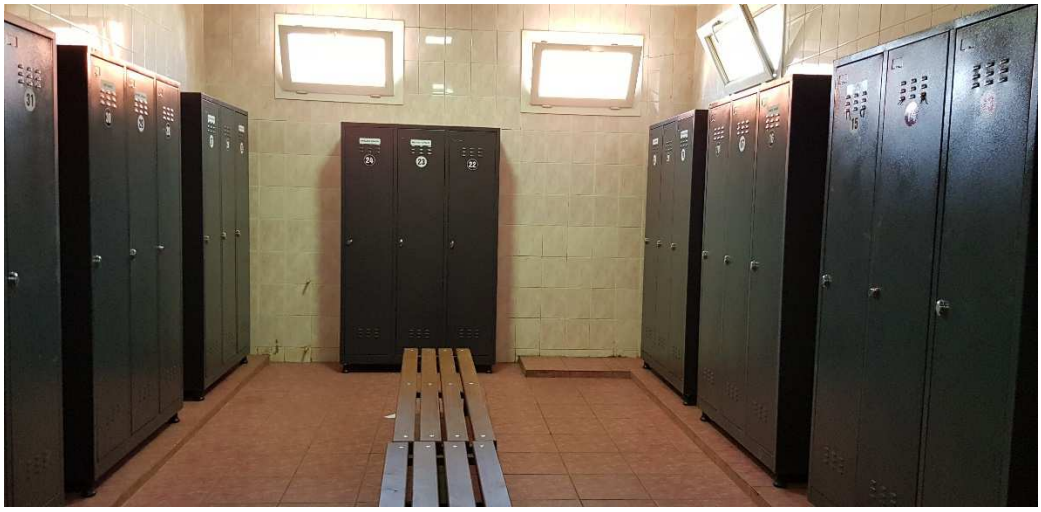
It could be established that the impermeable flooring was continuous during the site inspection.

The vessel being dismantled during the site inspection was landed in June 2020.

The permeable area between the sea line and the drainage line seemed to be newly cleaned, and little debris was seen during the site inspection.


Extinguishers were observed throughout the facility. Periodically checked.

The workers had a canteen, sanitary and washing facilities and cloakrooms



The facility had one dormitory with a capacity of three people

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DNV GL is a global quality assurance and risk management company. Driven by our purpose of safeguarding life, property and the environment, we enable our customers to advance the safety and sustainability of their business. We provide classification, technical assurance, software and independent expert advisory services to the maritime, oil & gas, power and renewables industries. We also provide certification, supply chain and data management services to customers across a wide range of industries. Operating in more than 100 countries, our experts are dedicated to helping customers make the world safer, smarter and greener.