

Ships for Scrap III

Steel and Toxic Wastes for Asia

**Findings of a Greenpeace
Study on Workplace and
Environmental
Contamination in Alang-
Sosiya Shipbreaking Yards,
Gujarat, India.**

GREENPEACE

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1. Introduction

In some cases, it takes more than 10 years for the symptoms to emerge. It begins with an increasingly pronounced shortness of breath, combined with a rasping, incessant cough. A dry crackling sound accompanies every breath. The condition of the victim rapidly deteriorates. Pretty soon, he suffers significant weight loss, and begins to bring up blood in the sputum every time he coughs.

By now, it is probably already too late. The asbestos he has inhaled in some earlier part of his life has done its damage. The fine and virtually indestructible asbestos fibres are now lodged in the microscopic air sacs of his lungs. The lung's defence mechanisms are faced with no option but to give up their futile attempts to destroy the fibres. Soon, a hardy scar tissue forms around the now inflamed lung walls, making breathing less efficient, and increasingly painful.

The victim will go through the mandatory chest and/or abdominal pains, and if a cardiac arrest doesn't kill him, he is quite likely to succumb to a lingering death due to one or other forms of cancers associated with asbestosis – an often-deadly affliction caused primarily by workplace exposure to asbestos. If he is a smoker, or is exposed to other poisons and cancer-causing agents during the course of his work or other activities, cancer could become a near certainty.

The migrant workers at the shipbreaking yards have a raw deal. In India, they travel long distances, hundreds, sometimes thousands of kilometers, before landing a job at one of the shipbreaking yards. Here, they end up

stripping entire ships with bare hands, sledgehammers and gas torches.

They break other people's ships, inhaling poisons contained within the structure of the ships that built the empires of shipowners from far-away countries. What doesn't go into the bodies of the workers ends up in the environment. Many of the poisons, including heavy metals and persistent organic pollutants build up in the environment. From here, they travel through the foodchain damaging entire sections of the ecosystem.

The ships are broken to recover valuable steel. Steel, we hear, is what goes into the building of a nation's economy and keeps the shipbreakers in business. For their efforts and for living and working in highly poisonous and physically hazardous surroundings, the workers at the shipbreaking yards get anywhere between \$2 and \$5 a day.

Talk of improving the living and working conditions of these workers, and calculators materialize in the hands of the shipbreakers, the steel tycoons, the multinational shipowners, the global regulators.

For these workers, destiny and global inaction dictates a life in poverty and a death by poisons.

2. Executive Summary

In June 2000, Greenpeace took up on an official invitation by the Gujarat Maritime Board – the Government agency entrusted with regulating the Alang shipbreaking yards – to enter and take environmental samples from the yards in Alang, Gujarat. At the same time, Greenpeace also entered and took samples from the Mumbai (Bombay) shipbreaking yards with the permission of the Bombay Port Trust.

The results of the analyses reconfirm the findings of Greenpeace's October 1998 investigation of these yards. If anything, two years of inaction is likely to have heightened the extent of toxic contamination at the shipbreaking yards resulting in increased health risks to workers and communities exposed to the poisons released into the environment from the yards.

Popular pressure from workers unions and environmental groups has led to a positive momentum among various stakeholders. Shipbreakers and even cash-starved shipbreaking countries are prepared to shoulder a part of the responsibility. But the shipowners, whose ranks include many multinationals with stated commitments to environmental and social responsibility, have stoutly refused to have anything to do with decontaminating their ships prior to their export to Asia for breaking.

In a submission dated 31 July, 2000, to the Correspondence Group set up by the International Maritime Organisation's Marine Environmental Protection Committee, the International Chamber of Shipping shrugs off all its responsibility in one swift stroke of the pen:

“Working conditions and employee health and safety are not issues which can be determined by shipowners. The issue of worker safety is essentially the responsibility. . . of legislators . . . employers . . . administrators.”¹

However, the popular sentiment may well go against the recalcitrant shipowners. Across the spectrum – from shipbreakers, government functionaries, trade union activists to environmental and health activists – support has grown for the demand that the “polluter pays,” that the shipowners who profit from the operation of the ship for more than 25 years must pay for decontamination before export and safe shipbreaking.

The Greenpeace investigation confirmed that shipyard workers are exposed to a deadly cocktail of toxic substances released during the course of shipbreaking. Heavy metals, asbestos, dangerous levels of organotins, and cancer-causing poly aromatic hydrocarbons (PAHs), contaminate the workplace. The levels of some of the pollutants such as organotins and PAHs in the soil and sediment in and around the yards are high enough to warrant the classification of these soils and sediment as hazardous wastes. Many of the poisons found will end up in the bodies of the workers and remain available in the local environment for long periods of time.

Asbestos, the primary pollutant of concern, was found even in the living quarters of the workers. Given the casual manner in which large quantities of asbestos are stripped from the ships, and the proximity of the workers quarters to the shipbreaking yards, it is highly likely that the asbestos in the quarters are carried by air-borne dust and/or by the workers on their clothes.

Investigations conducted by Greenpeace in China and Bangladesh indicate that the conditions in these countries are fundamentally no different, at least as far as asbestos handling is concerned. Our investigators report extensive and visible contamination, and patently unsound work practices in the shipbreaking yards of all three countries – India, China and Bangladesh. However, in China, the workforce was better trained and the torchcutters were better protected. Nevertheless, the workforce and visitors not involved in torchcutting were still exposed to the fumes.

Environmentally too, the Chinese yards offered slighter chances of marine pollution because much of the processing of the steel plates takes place at a distance from the sea on a concrete surface – rather than in the vicinity of the intertidal zone as is the case in India and Bangladesh.

In fact, Greenpeace investigators observed a consistent pattern of hazardous practices relating to asbestos or insulation removal, torchcutting and waste management in the Asian yards. In human terms, these unsafe practices translate, at a conservative estimate, to 100,000 workers in the three countries who are directly exposed to workplace and environmental poisons released during the breaking of contaminated ships-for-scrap.

Dr. Frank Hittmann, the Occupational Health Officer of the German state of Bremen, has publicly stated in an interview with ARD-TV (First German TV) that the lack of safeguards in handling the various contaminants means that every fourth worker in Alang must be expected to contract cancer.²

Because many of the poisons released in the course of shipbreaking are persistent and bioaccumulative in nature, the magnitude of environmental and human impact should be assumed to be far greater than merely on the directly-affected workers.

That's the bad news.

The good news is that after more than two years of name-calling and nay-saying, the shipping industry, the shipbreakers and the world governments seem ready to address the threats posed by the breaking of toxic ships-for-scrap to the environment and workers.

India requires special mention for the small, but resolute steps it has taken, to unilaterally address the problem. Besides mandating gas-free certificates for all tankers – which has reportedly brought down the number of worker casualties due to explosions and fires – the Indian authorities, goaded by the country's judiciary and a vigilant press, have also begun laying out guidelines for safe work practices and penalties for violations of the same.

Most notable among these initiatives is that of the Gujarat Maritime Board (GMB) which has issued a notification with broad-ranging, albeit largely unimplementable, regulations.

In Alang, Greenpeace found a marked increase across the yard in the number of workers using hard-hats, gloves and boots. The yards visited also had basic fire-fighting equipment. Although, the types and numbers of protective gear in evidence is by no means adequate, the increased use of protective equipment indicates that with proper guidance, the authorities and shipbreakers will cooperate to make the changes to improve protection for the workers.



Workers using hard-hats (Photo: Santosh Bane)

The Gujarat Maritime Board had put up a number of colourful, simple messages encouraging safe work practices among workers. Several shipbreakers had also put up signboards on safety issues, although the language of communication (English) leaves one wondering whether the target audience is the worker – who speaks Hindi and/or his native language -- or the critical English-speaking visitor.

Ironically, India's unilateral moves to enforce gas-free certification has diverted tanker demolition business to Bangladesh, where such regulations if available are not properly enforced. Clearly, anything short of a global regime for decontamination and regulation will merely serve to move the problems from one country to another, rather than solve them.

Experience from industrialized nations indicates that “controlled use” or handling of asbestos with a view to eliminating dangers to worker health are not possible by regulatory means. As a result, the popular wisdom in Europe and many other countries is to ban all use of asbestos.

In other words, even the highly sophisticated techniques of asbestos removal, performed under the supervision of effective regulatory and enforcement machinery by trained workers and watched over by an aware community, cannot completely eliminate the dangers to the health of the workers. Under such circumstances, the proposal from various quarters that decontamination should be done at the Asian shipbreaking yards using better techniques is fraught with danger, given the abysmal state of the enforcement

machinery and the difficulty that workers have in asserting themselves.

Supported by the new evidence, Greenpeace demands are:

1. Shipowners/operators must present a complete inventory of all hazardous material on board the vessel, making a register of the pollutants and analysis of the dangers from the ships;
2. The Polluter (Shipowner/operators) must decontaminate the ships-for-scrap prior to export;
3. Shipbreaking should be conducted without threat to worker or environmental health;
4. Tankers must be made gas-free for hot works prior to export for breaking;
5. Shipowners/operators must disclose the selected shipbreaking facility and the assessment done to ascertain good working conditions and environmental record;
6. Shipowners and shipbreakers must carry out extensive consultations on the breaking plan and put in place expert monitoring;
7. Shipbreaking facilities should be freely accessible by citizen groups, environmental NGOs and trade union activists;
8. Shipbreaking should be subject to a global regulatory regime, rather than a matter of unilateral measures.

Looking ahead, Greenpeace demands that:

1. Existing ships should be made progressively cleaner, by systematically removing, and replacing toxic and hazardous substances during maintenance, repair, refitting and rebuilding programmes;
2. The “next generation” of ships should be “clean ships,” i.e. ships that are designed and constructed with a view to eliminating their environmental and health and safety implications upon decommissioning.

As is evident from our demands above, Greenpeace is neither opposed to either the shipping or the shipbreaking industry. We will, however, actively oppose the export of ships that are not decontaminated, and unsound breaking practices that threaten the environment and the health of workers.

3. Scope and Objectives

Greenpeace's first visit to the Indian shipbreaking yards, in October 1998, was limited by the lack of official permission. During this visit, samples of seawater, soil and sediment were taken only from one plot, the perimeter of the yard, and from the more distant stretches of the coast and inland. As a result, it was not possible to get more than a spotlight picture of soil, sediment and seawater contamination. Neither was it possible to actually determine the nature of contamination in the workers' living quarters.

Nevertheless, the 1998 investigation, was successful in establishing beyond doubt that ocean-going ships contain substantial amounts of toxic and hazardous substances within their structures, and that the breaking of these ships releases these toxic substances into the environment.

Following up on a public offer by the Gujarat Maritime Board (the regulatory authorities for Alang) in February 2000 to permit NGOs to visit the shipbreaking yards, Greenpeace revisited Alang-Sosiya yards in June 2000, nearly two years after its first visit. The visit to Alang was preceded by a short investigation of the Mumbai shipbreaking yard.

In addition to meeting with representatives of the Alang Shipbreakers Association and the Gujarat Maritime Board, the Greenpeace team had two important tasks:

1. To assess the ambient environmental conditions, with special regard paid to toxic contamination, in the workplace and living quarters of the workers;
2. To assess the degree of environmental pollution in the intertidal zone, the scrapping plot, workmen's living quarters and the immediate hinterland.

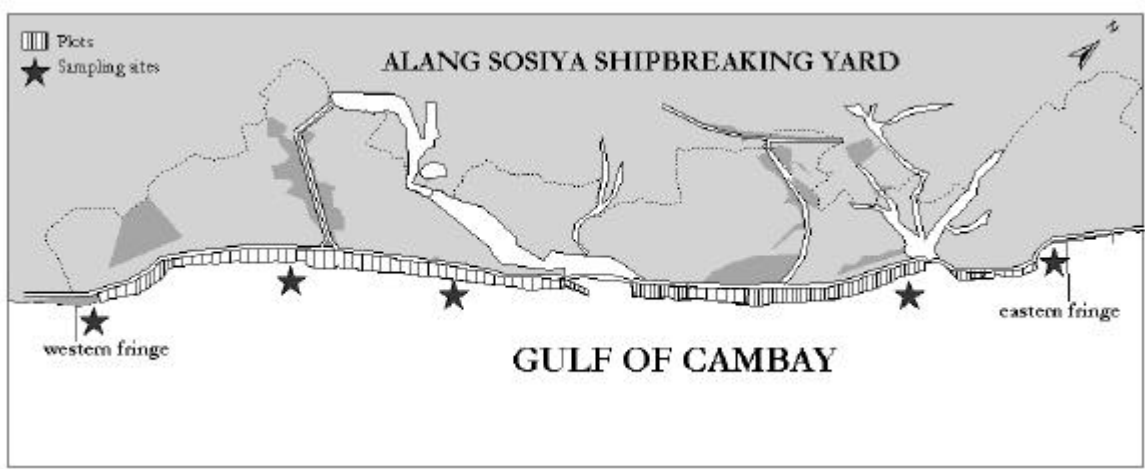
The assessment is not, and was not intended to be, a complete monitoring of the state of the working and natural environment in and around the shipbreaking yards. Rather, the objective was to generate sufficient evidence so as to be able to recommend immediate changes to improve the environmental and workplace quality, and identify problem areas, such as long-term and persistent pollution, that will prove more difficult to tackle.

4. Methodology

Samples were taken on June 6-7, 2000, from approximately predetermined spots in and around the shipbreaking yard.

4.1 The Intertidal Zone:

Because ships are broken in the intertidal zone, the highest degree of contamination is assumed to be contained within this zone and along the length of the shipbreaking yard. Along the approximately 10-plus kilometer long spread of shipbreaking plots, it was expected (at the time of sampling) that the area with the highest density of plots – between 2000 and 3000 meters from the Eastern Fringe – would be the most contaminated.



Map 1: Sampling sites at the Alang Sosiya Shipbreaking Yard in the tidal range area

The sampling spots, “Eastern Fringe” and the “Western Fringe,” were each fixed at a distance of 500 metres outward from the last plots on either edge of the 10 kilometer stretch.

Within this belt, samples were taken of seawater and sediment. Analysis and evaluation of these samples focused on finding organotins, mainly Tri Butyl Tin (TBT) and its degradation products. These organotins are released from the toxic and persistent antifouling paint that is used on ships beneath the water line to discourage the growth of marine life on the ship’s surface. Isolated samples were also tested for heavy metals and polyaromatic hydrocarbons (PAHs).

4.2 Working Area on the Plots:

The greatest immediate toxic threat to health at the workplace comes from the handling of asbestos. Insulation material found lying within a plot, and dust/soil samples from the workers’ living quarters, public places and open dumps for ship rejects, were collected for analyses for the presence of asbestos.

In terms of ongoing and long-term exposure to workers and impacts on

environment, organotins, heavy metals, PAHs, dioxins and furans are the most critical and relevant persistent poisons of concern. Because chemicals under these categories are generally long-lived in the environment and tend to bioaccumulate and magnify, an understanding of the extent of contamination of the environment by these chemicals is important to appreciate the potential long-term and subtle effects on the environment and human health.

Therefore, soil samples were taken from the working area of the same shipbreaking plots from where sediment and seawater samples were collected. These samples were tested for organotins, PAHs, and dioxins and furans.

This report does not disclose the shipbreaking plot numbers. These plots were chosen to get a geographic representation of the spread of the yard rather than to assess the environmental state of individual yards. Given the existing conditions where none of the ships are decontaminated prior to arrival at the yards for scrapping,

environmental pollution cannot be avoided in any of the plots.

4.3 Workers' Living Quarters:

Samples of dust and soil were collected from two huts, one each close to the Western and Eastern Fringe. The huts, which are used by workers to sleep, were expected to be contaminated by asbestos dust, air-borne and/or carried into the areas by workers on their clothing, shoes and/or hair.

4.4 Other Samples:

A dust sample for asbestos analysis was taken from beneath the carpet at the Gopnath Temple, which lies between 200 and 300 metres from the oldest plots. A dust/soil sample was collected from near a refuse dump about 200 meters inland towards the Eastern fringe. The dump contained large amounts of insulation material, including material that was suspected to contain asbestos.

4.5 Laboratory Testing:

All samples were taken by Greenpeace campaigners Marcelo Furtado, Shailendra Yashwant, Hemant Babu and Nityanand Jayaraman, under the supervision of Judit Kanthak, a chemical engineer with Greenpeace. The Alang samples were taken on 6-7 June, 2000, and the Mumbai samples on 4 June, 2000.

The samples were sent to the laboratory used in 1998 -- GALAB Hightech Laboratories, Geesthacht, Germany, for analyses. The results were documented in Protocol 1641-1, dated 03-09-2000. [See Annexure 1: "Sample Details and Analysis Methodology"].

5. Findings

Three years in the limelight has proven to be a positive force for the Indian shipbreaking yards. While little has changed substantively as far as the risks due to toxic exposure faced by workers, it is quite clear that Alang is serious about saving its business and coming clean. This is evident from the attitudinal change among shipbreakers and the Government regulatory authorities. From a head-in-the-sand, devil-may-care attitude, the Alang players are looking at the real causes of their problems, and taking steady, if sometimes merely cosmetic, steps to counter the allegations of abysmal work conditions.

Clearly, though, some common-sense and simple work practices that are now mandatory pursuant to the GMB order will serve to significantly reduce workplace exposure to toxics among workers. For instance, the notification requires that "The shipbreaker shall sprinkle seawater over the working area in order to minimize dust generation due to material handling."³

5.1 Visual Inspection Report

Greenpeace investigators found a marked increase across the yard in the number of workers using hard-hats, gloves and boots (see photo p.7) The yards visited also had basic fire-fighting equipment.

Oxygen and acetylene bottles were found stored separately at designated places. It was not possible, though, to determine whether workers differentiate

between filled containers that must be stored upright and empty containers that can be horizontally stacked. All visible bottles were horizontally stacked.



Oxygen and acetylene bottles stacked horizontally (Photo: Judit Kanthak)

The Gujarat Maritime Board had put up a number of colourful, simple messages encouraging safe work practices among workers.



Educational signboard (GMB) (Photo: Santosh Bane)

Several shipbreakers had also put up signboards on safety issues, although the language of communication

(English) leaves one wondering whether the target audience is the worker or the critical visitor.



Educational signboards (shipbreakers) (Photo: Judit Kanthak)

At the time of the visit, the Gujarat Maritime Board was also preparing a masterplan for revamping the infrastructure to deal with hazards and hazardous substances. Several shipbreakers were keen to implement easy, immediate actions that would significantly improve workplace safety.

On the ground, though, little had changed.

Whatever limited improvement or changes were in evidence in the yards were oriented toward providing marginal protection for workers from the ubiquitous environmental poisons. Virtually no steps have been taken to prevent environmental contamination. Although the Greenpeace team did not

witness any open burning in the few yards it visited, it did encounter several sites outside the plots where sundry discards were either being burnt or had been burnt.

The beaches beyond the two edges of the yards are littered for at least a kilometer with debris, foam and plastics from the yards.

Asbestos continues to be handled and discarded haphazardly. Open dumps with insulation material, oily rags, foam and asbestos dot the landscape. Face masks and respiratory gear were nowhere in evidence. No efforts had been made to suppress dust-generation in the yards or the road.



Open dumps; asbestos (Photo: Santosh Bane)

The approach road to the plots and the plots themselves remain dangerously congested. This would prove to be a major obstacle to any meaningful emergency response.

Workers entering the intertidal zone during low-tide continue to do so without adequate footwear exposing themselves to the toxins in the sediment and to stray pieces of metals.

Most damagingly, village children from nearby settlements were found collecting fish and shellfish from the

severely contaminated beaches at the fringes of the yard.

5.2 Asbestos

The analyses confirmed the presence of asbestos dust in the workplace, living quarters and public areas, including the hinterland around Alang. Out of a total of six samples taken, five tested positive for asbestos. The implications of these findings for the workers, the shipbreakers themselves, and shop owners/employees along the shipbreaking yard are discussed in the chapter 6 titled "Discussion."

Sample No.	Location of sampling	Date of sampling	Description of the sample	Result
18	Shipbreaking Plot	06.06.00	Insulation material	Chrysotile
21	Open waste dump 200 m inland	06.06.00	Dust + soil	Chrysotile
23 A	Living area I Outside	06.06.00	Dust	Chrysotile
23 B	Living area I Inside, floor	06.06.00	Dust	Chrysotile
47 C	Living area II Inside, floor	07.06.00	Dust	Amphibolite
48 C	Living area III Temple inside, carpet	07.06.00	Dust	No asbestos

TABLE 1: Analyses Results for Asbestos. Alang-Sosiya Shipbreaking Yard.

Note: Amphibolite is the group name for the following commercial types of asbestos – crocidolite, anthophyllite, amosite, acinolite and tremolite.

5.3 Organotins

The results indicate severe and extensive contamination of seawater and sediment by poisonous organotin compounds at all sampling sites. This

has serious implications for workers who either walk through the marshy intertidal zone during low-tide or work there dragging pieces of ship steel to shore.

Sample No.		39	19	34 A	29 A
Distance to the western fringe	m	600	2,800	4,600	12,200
Date of sampling		06.06.00	06.06.00	06.06.00	06.06.00
Monobutyl tin	ng/l	462	330	1,220	120
Dibutyl tin	ng/l	1,440	739	5,900	59.6
Tributyl tin	ng/l	8,400	1,290	10,900	74.1
Tetrabutyl tin	ng/l	<20	<20	194	<1
Triphenyl tin	ng/l	<20	<20	<1	<1

TABLE 2: Organotins in Seawater, Alang

The highest concentration of tributyl tin – 19,400 µg/kg in sample # 42A -- was found in the yard area where most plots are clustered together. [See Table 3 below] This lies approximately 2100 meters from the Eastern Fringe. The level found here is approximately between 10 and 100 million times higher

than internationally recognized limits (0.005 to 0.05 µg/kg) for TBT in marine sediment.⁴

Although the level (768 µg/kg) found in the sediment taken from the Western fringe, which is 500 meters away from the last Westside plot, is substantially

lower, port authorities and agencies regulating industrial sites in the European Union are preparing legislation that would classify such sediments as a hazardous waste. For instance, Hamburg, Germany, already

has a political decision to classify grime (dredging sludge from the river Elbe) with more than 250 µg/kg as hazardous waste.⁵

Sample No.		24 A	20 A	41 A	42 A	43 A
		western fringe				eastern fringe
Distance to the western fringe	m	0	2,800	4,600	10,100	12,200
Date of sampling		06-06-00	06-06-00	07-06-00	07-06-00	07-06-00
Monobutyl tin	µg/kg	4.7	86.9	41.1	382	3.6
Dibutyl tin	µg/kg	55.1	784	311	1,320	10.7
Tributyl tin	µg/kg	768	10,100	2,320	19,400	78.4
Tetrabutyl tin	µg/kg	18.3	162	31	350	2.1
Triphenyl tin	µg/kg	<1	<1	10.1	43.4	<1

TABLE 3: Organotin compounds in marine sediment, Alang

Table 4 below lays out the organotin content in a soil sample taken from the same plot where marine sediment sample #41A was taken. Soil from this plot was chosen for analyses because the sediment sample here yielded significantly lower levels of TBT than two other samples for the same chemical.

Implications for workers of such high levels of organotins in the soil are disturbing, especially since this soil sample comes from a plot where organotin levels in sediment are relatively low compared to those in other samples. In other words, we can assume that most plots are even more polluted than indicated in the tested soil sample.

Sample No.		35 A
Distance to the western fringe	m	4,600
Date of sampling		06-06-00
Monobutyl tin	µg/kg	61.2
Dibutyl tin	µg/kg	92.6
Tributyl tin	µg/kg	384
Tetrabutyl tin	µg/kg	21.4
Triphenyl tin	µg/kg	<1

TABLE 4: Organotins in soil, Alang

A more detailed analyses of the human and environmental implications of these numbers is dealt with in the following chapter titled "Discussion."

5.4 Heavy Metals

Sediment samples taken from the various plots indicate elevated levels of heavy metals, including those like lead that bioaccumulate in living tissue.

Levels of lead, for instance, are already close to the upper limits measured in the German North Sea sediment (250 mg/kg) between 1994-1998.⁶

The levels of other metals detected in the Alang sample are typical of pollution in regions with a long industrial history. The levels are only likely to increase to significantly higher levels if shipbreaking continues with a business-as-usual approach.

Sample No.		20 B	41 B	42 B
Distance to the western fringe	M	2,800	4,600	10,100
Date of sampling		06-06-00	07-06-00	07-06-00
Arsenic	mg/kg	30	<5	20
Cadmium	mg/kg	<10	<5	<10
Chromium	mg/kg	140	40	70
Copper	mg/kg	270	230	210
Iron	mg/kg	162,500	34,600	63,400
Nickel	mg/kg	80	40	50
Lead	mg/kg	220	110	180
Zinc	mg/kg	1100	670	530

TABLE 5: Heavy metals in sediment, Alang

5.5 Polyaromatic hydrocarbons (PAHs)

The different profiles of the toxic substances analysed in the soil and sediment samples indicate that the sources of contamination in the two media are different. The soil sample, for instance, was contaminated with PAHs from combustion processes. The PAHs contaminating the sediment seem to come from different sources, such as leaked oil.

The practices of open burning – of wastes using oil as a fuel -- observed during Greenpeace's first visit to Alang in 1998⁷ is likely to have played an

important role in lending to the profile of the PAHs found in the soil. The PAH profile of the soil sample is similar to an analysis result of combustion residues of an accidental fire at the Chang Jian shipbreaking yard on the banks of the Yangtse River, North of Shanghai in August 1999. The fire was caused during routine torchcutting of ship steel.⁸

The sediment samples do not show a specific pattern. This may be due to:

- a) the variety of contamination such as bilge oil, residual fuel, lubricants and greases;

- b) the constant movement in the intertidal zone;
- c) the influence of aquatic microorganisms degrading the substances to different degrees.

However, these patterns are consistent with the practice at yards where oil leaks from the ships end up in the tidal area, while the plots, from where soil samples were taken, are used for torch-cutting the steel plates into smaller pieces.

No.		35 C	41C
Description of the sample		Soil	Sediment
Distance to the western fringe		4,600 m	4,600 m
Date of sampling		06.06.00	06.06.00
Naphtalene	µg/kg	138	661
Acenaphtylene	µg/kg	69	839
Acenaphtene	µg/kg	241	839
Fluorene	µg/kg	69	679
Phenantrene	µg/kg	2,827	822
Anthracene	µg/kg	241	393
Fluoranthene	µg/kg	3,171	929
Pyrene	µg/kg	3,102	893
Benz(a)anthracene	µg/kg	1,206	911
Chrysene/Triphenylene	µg/kg	1,827	911
Benzo(b)fluoranthene	µg/kg	1,792	929
Benzo(k)fluoranthene	µg/kg	793	875
Benzo(a)pyrene	µg/kg	1,275	911
Indeno(1,2,3-cd)pyrene	µg/kg	1,034	893
Dibenz(a,h)anthracene	µg/kg	655	697
Benzo(g,h,i)perylene	µg/kg	896	732

TABLE 6: PAHs in soil and sediment, Alang

The OSPAR (Oslo Paris) Commission on the Protection of the Northeast Atlantic defines a maximum tolerable level of 100 µg/kg for sediment for each PAH combination. The levels of PAHs found in the Alang sediment are between four and nine times higher than these prescribed levels. The sediment of the German North Sea, an area which has witnessed a long and intense history of industrial contamination, also has highly elevated levels of PAHs.

5.6 Dioxins and Furans

Combustion processes release polyaromatic hydrocarbons, dioxins and furans, often simultaneously. Dioxins and furans (PCDD/F) are normally associated with the incomplete combustion of organochlorine compounds.

Shipbuilding in the 1970s involved the use of a number of organochlorines, including chlorinated solvents in paints; chlorinated flame retardants; polychlorinated biphenyls in sealants,

plastics etc, and PVC in various applications.

Concentrations of PCDD/F in the single sample analysed for the chemicals were found to be low but not insignificant compared to other dioxin hotspots and dioxin-contaminated industrial sites. Nevertheless, because there are no safe

levels of exposure to dioxins, and because these chemicals are persistent and bioaccumulative in nature, the very presence of significant levels of dioxins and furans requires that immediate further evaluation be conducted into identifying possible sources and isolating the same.

Sample No.		35 B
Distance to the western fringe	m	4,600
Date of sampling		06.06.00
2,3,7,8-TCDD	ng/kg	2
1,2,3,7,8-PeCDD	ng/kg	8
1,2,3,4,-7,8-HxCDD	ng/kg	9
1,2,3,6,7,8-HxCDD	ng/kg	38
1,2,3,7,8,9-HxCDD	ng/kg	17
1,2,3,4,6,7,8-HpCDD	ng/kg	1,230
OCDD	ng/kg	9,680
2,3,7,8-TCDF	ng/kg	50
1,2,3,7,8-PeCDF	ng/kg	45
2,3,4,7,8-PeCDF	ng/kg	52
1,2,3,4,7,8-HxCDF	ng/kg	61
1,2,3,6,7,8-HxCDF	ng/kg	59
1,2,3,7,8,9-HxCDF	ng/kg	4
2,3,4,6,7,8-HxCDF	ng/kg	54
1,2,3,4,6,7,8-HpCDF	ng/kg	284
1,2,3,4,7,8,9-HpCDF	ng/kg	22
OCDF	ng/kg	267
NATO/CCMS-TE	ng/kg	89

TABLE 7: Dioxins and furans in soil, Alang

6. Discussions

6.1 Asbestos

Asbestos-related illnesses pose a serious and constantly increasing risk to the health of workers and people frequenting the shipbreaking yards. If

anything, matters have worsened in this regard since Greenpeace's 1998 investigations. That is because ships containing asbestos continue to arrive in Alang, and are subject to the routine grab-rip-dump operations by barehanded, unprotected workers.

Asbestos was found strewn casually around -- in the shipbreaking plot and in open dumps further inland. This poses a serious health risk not only to the shipyard workers, but also to the shipbreakers, the roadside vendors, the transport workers and the Gujarat Maritime Board workers stationed at the shipbreaking yard, not to mention neighbouring communities of peasants.

To our knowledge, no medical check-up has been carried out among the workers and other people frequenting the Alang shipbreaking yard to assess the prevalence of asbestos-related ailments. Despite the absence of such data, given the prevailing conditions (both natural and human-induced) it wouldn't be far-fetched to assume that the affliction could be of serious proportions.

1920	Connection established between asbestos and pulmonary fibrosis
1936	Recognition of asbestosis as an occupational illness
1940	Connection established between asbestosis and bronchial carcinoma
1943	Recognition of bronchial carcinoma in conjunction with asbestosis as an occupational illness
1960	Connection between asbestos and mesothelioma of the pleura
1973	Spray-applied asbestos banned in the USA
1976	Recognition of mesothelioma of the pleura as an occupational illness
1979	Spray-applied asbestos banned in the Federal Republic of Germany
1989	Manufacture and sale of asbestos prohibited in the Federal Republic of Germany (deadlines for transition by 1994)
1995	Ban on the re-use of products containing asbestos in Germany

TABLE 8: Historical development of discoveries and bans relating to asbestos and asbestos-related illnesses

The cancer-causing properties of asbestos have been known to science since the 1930s. In fact, few other hazardous substances in the world have attracted so many laws, regulations and technical guidelines relating to identification, removal and liability, as has asbestos.

In the Netherlands, more than 10,000 estimated cases of asbestos-related ailments were recorded between 1969 and 1994. This period corresponds to the early years after exposure. Because many of the asbestos-related ailments, in particular the cancers, manifest themselves approximately 15 to 35

years after exposure, the number of people succumbing to decades-old asbestos exposure is likely to skyrocket in the coming decades. Evidence for this comes again from the Netherlands, where 42,600 men and women are likely to suffer from asbestos-related diseases between 1996 and 2030. Of this, the majority will be people who were exposed to asbestos in the workplace or otherwise.

Of the total estimated number -- of 52,600 -- of asbestos victims between 1969 and 2030, less than 500 people (those afflicted with asbestosis) are likely to survive the disease. Most of the

remainder, afflicted with cancers will succumb to the disease rapidly.⁹

In India, the figure is likely to be substantially higher, with the shipbreaking industry accounting for a significant number.

Interestingly, although asbestos dust and fibre wastes are patently hazardous wastes banned for import into India, the waste asbestos from ships are conveniently ignored by the enforcement authorities. Not only that, the asbestos actually finds its way into the Indian market after workers have manually stripped these deadly fibres from ship structures.

Shiv Gupta, an Alang shipbreaking plot owner, in a revealing interview to Lloyd's List says:

*"Dealers pay us Rs. 5 (11 US cents) per kilo, and insist that we do not pack it for them. They prefer to scrape it off themselves, so that they can retain as much of its purity as possible."*¹⁰

The shipbreaking industry will be killed if and when the workers decide to lodge compensation claims for asbestos-related injuries against their employers. [See box "Asbestos Liabilities: A heavy price to pay"]

Interestingly, shipowners and ship-operators, the prime culprits, will have managed to pass on the compensation liabilities to the shipbreakers once they

succeed in exporting the ships with the asbestos intact.

Lloyd's of London, which guarantees unlimited liability on its insurance, based on the private fortunes of tens of thousands of investors, is having to pay out increasing amounts in compensation – for asbestos-related illnesses.

With a plethora of cheap insurance policies from the past in their hands, US lawyers are securing astronomical sums in compensation for clients who became ill after handling asbestos-containing material. Claims by asbestos victims have already ruined a number of Lloyd's guarantors; some have even committed suicide. Lloyd's is stricken: unlimited liability and asbestos are clearly a dangerous combination.

Fortunately, the avenues for exporting ships with asbestos to India are gradually closing down. An August 2000 notification¹¹ by the Gujarat Maritime Board requires that the Master of the ship-for-scrap "shall" present a certificate that no dangerous gas, toxic or any other hazardous chemical/waste are present on board of the ship. While this is not exactly an implementable clause given its vague and all-encompassing nature, it adequately reflects earlier Indian guidelines¹² and the sentiment of the Indian Supreme Court to prevent the import of any hazardous wastes into India.¹³

Asbestos Liabilities: A Heavy Price to Pay

Millions of workers have been exposed to asbestos dust since the early 1920s. Among shipyard workers, asbestos miners and millers, asbestos product manufacturers, construction and demolition workers, asbestos-related ailments are not just routine, but increasingly acknowledged as an occupational disease warranting compensation from the employer. In India too, a variety of national legislation – the air and water Acts, the Hazardous Wastes (Management and Handling) Rules (1989), the Factories Act (1948) – governs the import, use, handling and disposal of asbestos and asbestos wastes.

It is generally accepted that the risk to workers increases with heavier and long-term exposure. However, investigators have also found asbestos-related diseases in some shipyard workers exposed to high levels of asbestos fibres for only brief periods (as short as 1 or 2 months¹⁴). Even workers who may not have worked directly with asbestos but whose jobs were located near contaminated areas are known to have developed asbestosis, mesothelioma, and other asbestos-related cancers.

In six Western European countries (Britain, France, Germany, Italy, Netherlands, Switzerland) asbestos exposure will cause 250,000 deaths from mesothelioma over the next 35 years. At least an equal number is expected to succumb to asbestos-related lung cancer, suggesting that there will be more than 500,000 asbestos-related deaths in Western Europe over the next 35 years.¹⁵

The financial liabilities associated with asbestos-related compensation and phase-out are mindboggling. A September 1999 study by Greenpeace Netherlands on asbestos-related liabilities in the Netherlands at NLG 67 billion (approx. \$ 30 billion) for the period 1999-2045.¹⁶ Of this, a conservatively estimated NLG 7 billion (approx. \$3 billion) is expected to serve as compensation for victims and families. Although these figure are an estimate of land-based asbestos liabilities, it is indicative of the magnitude of the problem.

The arguments of shipowners that decontamination of ships ought to be done in the Asian shipbreaking yards under an improved regulatory regime ignores these facts. Moreover, the fact that the European Union, and several other countries including the USA have banned most, if not all, uses of asbestos is proof that regulatory means are not commensurate to the dangers posed by asbestos. If that is the verdict of countries that claim to have stringent implementation of regulations, it would be hypocritical to expect better handling of asbestos in countries like India, Pakistan, Bangladesh and China.

6.2 Organotins

Tributyltin (TBT) is an aggressive biocide (kills living organisms) that has been used in anti-fouling ship paints since the 1970s. The toxicity of TBT prevents the growth of algae, barnacles

and other marine organisms on the ship's hull.

In fact, after years of scientific backing-and-forthing, the word is out that the preponderance of evidence implicate TBT as constituting an unmanageable

threat to the marine environment. Its impacts on marine organisms range from the subtle to the lethal. [See box: "TBT: Deadly at Sea"]

In 1998, the General Assembly of the International Maritime Organisation decided that the Marine Environment

Protection Committee (MEPC) should work on a global legal instrument to ban TBT. It was also decided that the ban should be effective in 2003 when it comes to the application of TBT paint and in 2008 when it concerns the presence of TBT paints on a ship.¹⁷

TBT: Deadly at Sea

TBT is responsible for the disruption of the endocrine system of marine shellfish leading to the development of male sex characteristics in female marine snails. TBT also impairs the immune system of organisms. Shellfish are reported to have developed shell malformations after exposure to extremely low levels of TBT in the seawater. Recent studies conducted by the Dutch Institute for Marine Research and the Free University (VU) of Amsterdam reveal that sperm whales that live and feed in the deep ocean far from ports and shipping lanes have appreciable amounts of TBT and its breakdown products in their bodies. This indicates that TBT may be widely dispersed in the marine environment, including the deep oceans where sperm whales normally live and feed.

TBT and its degradation products have been isolated from a wide range of marine environmental samples. In many cases, a relationship between levels of environmental contamination and the intensity of shipping traffic can be detected. TBT has been found in the tissues of cetaceans, seals, sea otters and water birds in a wide range of locations around the world. Tissues and sediments sampled from areas with heavy shipping activity show the highest levels of contamination.¹⁸

In industrialised nations, legal regulations are in place to protect workers from exposure to antifouling paints containing the poisonous tributyl tin (TBT). Skin, eye and lung protection are mandatory for any contact work with TBT-containing paints.

That is because, even in small doses, organotin compounds can damage human health. In occupational health parlance, the maximum workplace concentration (i.e. the highest amount that a healthy worker can be exposed to for eight hours a day) for tributyl tin oxide (TBTO) is 0.05 mg/m³ of air.

In Alang, there is evidence that the floor of the work area is contaminated with TBT at levels (384µg/kg) that would render the soil a hazardous waste requiring regulated disposal under some European regulation. Not only that, in the absence of protective masks, workers torchcutting metal plates coated with TBT paints are constantly exposed to metal and TBT fumes through inhalation.

On the basis of peak values measured, Greenpeace identified 10 TBT hotspots in Europe in 1999/2000.¹⁹ Comparison of the peak concentrations of TBT and its degradation products in the sediment at Alang with the values from European

hotspots puts Alang at 6th place among the top ten European TBT hotspots. [See Table 9]

The peak value is the sum of tributyl tin (TBT) and its degradation products dibutyl tin (DBT) and monobutyl tin (MBT). MBT and DBT are also toxic;

both are found regularly in the tissue of marine animals.

In Alang – the largest scrapping yard of the world – no TBT cleanup measures are in place. Contamination levels in seawater and sediment are already substantial outside of the scrapping yard.

PORT	LOCALITY OF SAMPLING	SOURCE		à MBT, DBT, TBT
Rotterdam The Netherlands	Eemhafen port	Dutch Ministry for Transport and Waterways, 1999	µg/kg	1,000 (TBT only)
Thessaloniki Greece	Port – Dock 24	Greenpeace 10-08-00	µg/kg	1,333
Rostock Germany	Neptunwerft Floating dock	Greenpeace 09-09-99	µg/kg	4,978
Livorno Italy	Docks	Greenpeace 17-08-00	µg/kg	8,801
Odense Denmark	Lindovaerflets	Danish Energy Ministry, 2000	µg/kg	14,288
Alang – Sosiya Gujarat/India	Shipbreaking Yard	Greenpeace 06-06-00	µg/kg	21,102
Barcelona Spain	Fishing harbour	Greenpeace 01-09-2000	µg/kg	22,462
Antwerp Belgium	Port	Greenpeace 2000	µg/kg	28,273
Piraeus Greece	Kinosoura harbour	Greenpeace 10.08.2000	µg/kg	94,792
Hamburg Germany	Norderwerft yard	Greenpeace 17-09-99	µg/kg	106,605
Marseille France	Avant Port Nord Forme 10	Greenpeace 25-08-00	µg/kg	241,370

Table 9: Comparison of peak concentrations of TBT and its degradation products in the sediment of European ports with the peak level found in the Alang-Sosiya shipbreaking yard

The degree to which skin can absorb TBT should not be underestimated. Direct, unprotected contact to painted surfaces or walking barefoot along the beach or the intertidal zone (a normal practice in Alang) can be a significant

source of exposure, causing local skin irritation or accumulation in the body of the exposed worker.²⁰

An increased risk to health is to be expected from the absorption of TBT through the skin:

- Through exposure on palms and soles because these parts of the body have better circulation than others;
- When heat, exposure to warmth or physical exercise increase circulation in the skin;
- When work in a damp environment or humidity swells the top layer of skin, allowing increased surface area for absorption.

All three conditions apply simultaneously to workers exposed to TBT in shipbreaking yards.

6.3 PAHs, Dioxins/Furans

The health hazard from PAHs, dioxins and furans comes from directly inhaling fumes, which are released primarily during torchcutting, after torchcutting when paints continue to fume and smoulder, or when wastes are deliberately burned. Dioxins, like PAHs, accumulate in dust and sediment, and tissues of lifeforms. As a result they are available for uptake either through inhalation, dermal contact or via the foodchain.

PAHs cause malignant tumours by interfering with enzymatic breakdown, affecting the lungs, stomach, intestines and skin. The potential of substance mixtures containing high PAH levels to cause skin cancer is known since 1775. Increased incidences of certain carcinomas of the skin and respiratory tract have consistently been found among certain occupational groups such as chimney-sweeps, coke oven workers etc.²¹

The PAHs found in the soil samples at the shipbreaking plots are attributable to combustion sources – i.e. torchcutting and/or open burning. Besides the impact on the environment, combustion as a source implies a double exposure for workers to the poisons – first, during the cutting or burning operation through inhalation of fumes; second, by inhalation of PAH-laden dust from the work area.

Only one soil sample from Alang was analysed for dioxins. The fact that the single sample of soil analysed for dioxins tested positive with significant levels confirms our assumption that shipbreaking as an activity should be further evaluated as a potential dioxin source. Simultaneously, efforts must be made to pinpoint and isolate the potential sources leading to the formation of dioxins during shipbreaking.

Dioxins/furans are known to be among the deadliest of persistent and bioaccumulative poisons for which there are no safe levels of exposure. Dioxins are known human carcinogens. Even at low doses, these poisons are capable of causing serious and often irreparable damage to the immune and reproductive systems of lifeforms. Their ability to interfere with the endocrine systems (or hormone-regulating systems) of mammals also means that they are capable of causing sexual disorders along the food chain.

The current low levels should certainly not be taken as indicative of the absence of a problem.

In fact, owing to its highly toxic nature, its mobility in the environment and its ability to threaten the global environment, dioxins and furans are among the 12 priority substances slotted

for global action under the United Nations Environment Program's Treaty on Persistent Organic Pollutants. The treaty that is expected to be finalized in Stockholm in May 2001, calls for strong action to minimize (with the ultimate aim of elimination where feasible) the release of industrial by-product POPs like dioxins.

The Greenpeace investigation did not focus specifically on dioxins and furans. However, the confirmed presence of dioxins at the yards requires that more indepth studies be conducted to assess the dioxin contamination throughout the yard. More importantly, because the coastline surrounding Alang continues to support a dwindling, yet substantial, number of sustenance fisherfolk, it would be important to investigate the possible contamination of marine life by dioxins originating at the yard.

7. Recommendations

At the outset, it must be said that under the given circumstances and conditions at Alang and internationally (in the absence of a global regulatory regime), no recommendations can be made for Alang that would eliminate health risks and environmental hazards.

A fully transparent regime allowing public scrutiny of the shipbreaking yards is a must for conditions to improve. The shipbreaking yards cannot unilaterally function in a manner that eliminates

threats to the environment and its workers. For this to happen, ships must arrive at the yard decontaminated. Environmentally, very little can be done to improve the situation at the shipbreaking yards unless the ships arrive decontaminated.

A precondition to workplace safety is the decongestion of shipbreaking yards. This may not be required in the Chinese yards, where space is generously available. But in Alang, the 30 meter plots need to be joined with their neighbours to allow for more space. In the Mumbai shipbreaking yards, where space is at a premium, it would be virtually impossible to improve conditions significantly. Under the circumstances as they exist in Mumbai, closure of the yards may be the only option to prevent further contamination of the environment and workers.

The shipowners claims that worker safety is a problem of the shipbreakers and the shipbreaking country governments reflects the ignorance of the commentators of local regulatory conditions and climatic conditions. The temperatures on the plot and on board the ship can reach 50 degree Celsius in Alang summers making it unbearable for workers wearing protective clothing designed for Northern climates.

Internationally, it is important to invest in the development of safety gear suited to the climatic conditions of India, Bangladesh and China.

Annexure 1

Sample Details and Analysis Methodology

SAMPLE NUMBER	SAMPLE TYPE	DESCRIPTION	SAMPLING DATE
18	Insulation material	Shipbreaking plot, 2,800 metres to the western fringe	06-06-00
19	Seawater	Shipbreaking plot, 2,800 metres to the western fringe	06-06-00
20 A	Sediment	Shipbreaking plot, 2,800 metres to the western fringe	06-06-00
20 B	Sediment	Shipbreaking plot, 2,800 metres to the western fringe	06-06-00
21	dust+soil	open waste dam, 200 metres inland from scrapyard	06-06-00
23 A	Dust	Living area I, outside	06-06-00
23 B	Dust	Living area I, inside, floor	06-06-00
24 A	Sediment	western fringe, 500 metres from the last plot	06-06-00
29 A	Seawater	eastern fringe, 500 metres from the last plot	06-06-00
34 A	Seawater	Shipbreaking plot, 4,600 metres to the western fringe	06-06-00
35 A	Soil	Shipbreaking plot, 4,600 metres to the western fringe	06-06-00
35 B	Soil	Shipbreaking plot, 4,600 metres to the western fringe	06-06-00
35 C	Soil	Shipbreaking plot, 4,600 metres to the western fringe	06-06-00
35 D	Soil	Shipbreaking plot, 4,600 metres to the western fringe	06-06-00
39	Seawater	Shipbreaking plot, 600 metres to the western fringe	06-06-00
41 A	Sediment	Shipbreaking plot, 4,600 m to the western fringe, ebb-tide	07.06.00
41 B	Sediment	Shipbreaking plot, 4,600 m to the western fringe, ebb-tide	07.06.00
41 C	Sediment	Shipbreaking plot, 4,600 m to the western fringe, ebb-tide	07.06.00
42 A	Sediment	Shipbreaking plot, 10,100 m to the western fringe, ebb-tide	07-06-00
42 B	Sediment	Shipbreaking plot, 10,100 m to the western fringe, ebb-tide	07-06-00
43 A	Sediment	eastern fringe, 500 metres from last plot, from the ebb-tide	07-06-00
47 C	Dust	Living area II, inside, floor	07-06-00
47 D	Dust	Living area II, inside, bed	07-06-00
48 C	Dust	Living area III, temple, inside, beneath carpet	07-06-00

List of the analysed samples taken at the Alang shipbreaking yard

- All samples were taken in laboratory PP-bottles (manufactured by SARSTEDT) for one-time use. The sampling equipment was recommended and made available by GALAB Hightech Laboratories.

- Methods, detection limits and QA/QC procedures are described in the GALAB analysis protocol:

PARAMETER	DETECTION LIMIT	UNIT	METHOD
Organotin compounds	1	µg/kg	hexane NaBEt ₄ , GC-AED ^{DACH}
Organotin compounds	1	ng/L	hexane NaBEt ₄ , GC-AED ^{DACH}
Dioxins and furans	1-50	ng/kg	AbfKlärV Anhang 1 1.3.3.2 (appendix to waste ordinance)
Asbestos		fibre	scanning electron microscopy
Heavy metals	0,01-0,005	g/kg	DIN 38414, TXRF ^{DACH}
Polychlorinated biphenyls	1	µg/kg	soxhlet extraction, GC-MSD
Polycyclic aromatic hydrocarbons	1	µg/kg	soxhlet-extraction, GC-MSD ^{DACH}

NOTE: Test procedures marked DACH are processes accredited in accordance with German DIN 17025 standards

Processes used and designated limits

ANNEXURE 2

More to Safety than Meets the Eye Health and Environmental Hazards at Alang

A Commentary by Judit Kanthak, chemical engineer and Greenpeace's technical person in-charge of conducting the Alang investigation.

Greenpeace campaigner Nityanand Jayaraman: "Sir, do you know the oldest plot in Alang? Where they first started breaking ships from abroad?"

Gujarat Maritime Board's Capt. Deulkar: "Yes... very clean... nice people."

Such a conversation between Greenpeace activists and the top official of Gujarat Maritime Board at the Alang

shipbreaking yard would have been inconceivable in 1998, when Greenpeace first visited the world's largest yard. Things have obviously changed. Today, the two are sitting together at a table in Capt. Deulkar's office located between two active shipbreaking plots in Alang.

Even a superficial look around the yard gives the impression that some things have changed since our last visit in 1998. In the last two years, people in Alang have started to take steps against the visible and invisible hazards to which workers are exposed both when dismantling the ships and in their living quarters. Most workers wear protective helmets and working clothes; colourful hand-painted pictorial signs warn of falling parts and exhorting workers to

use helmets – elementary but crucial lessons in workplace safety.

Tidiness and cleanliness, too, seem to be better appreciated in Alang. Despite ongoing work, most of the plots we visited seemed tidy and well-swept. The floors of the owners' office – which are located within the plots are freshly mopped. Visitors are offered water within the minutes of their arrival.

Located amidst the noisy, smoky ambience of the shipbreaking plots, the worker's accommodation though spartan and unventilated seem tidy, albeit exposed to dust. Apart from an oversized hard-bed on which 3-6 workers sleep, there is no other furniture in the 100 square foot room. The workers sprinkle water on the floor, of packed mud, during the day to prevent dust from rising.

But the tragedy behind these honest efforts becomes apparent only upon evaluation of the chemical analyses.

With the means at hand in Alang, it is impossible to protect the workplace, the living quarters and the yard surroundings from ship contaminants. With every passing day, the levels of heavy metals, polyaromatic hydrocarbons (PAHs) and tributyl tin (TBT) in the soil, coastal sediments and seawater are increasing.

Despite tidal currents and sediment drift, the highest concentrations of persistent pollutants in Alang can be expected where the largest quantities of ship steel have been recovered over the years – i.e. the oldest and most active plots.

A seawater sample taken from the oldest plot contained 120 times higher levels of the hormone disrupter TBT

than a comparable sample taken from the eastern fringe of the 12 km long stretch of shipbreaking plots.

The Greek word 'asbestos' means unquenchable, eternal. In Alang, asbestos is omnipresent. Asbestos fibres are carried by the fine dust to contaminate the air, the soil and the workers' huts. Out of six samples taken and analysed for asbestos, only one tested negative – from beneath the carpet at the Hindu temple at the shipbreaking yard.

By 'clean', Capt. Deulkar obviously means 'well-swept.' Keeping in mind the mind-boggling quantities of hazardous substances extracted from ships and dumped here over the years, Capt. Deulkar's use of language is understandable. Keeping things well-swept is hard enough. To keep things truly clean here is impossible unless the ships come in clean.

ANNEXURE 3

Greenpeace Activities Since 1998 Targeting the Shipping Industry, Governments and Shipbreakers to Seek Commitment for Improvement to the Ship Scrapping Practices

AMSTERDAM, FEBRUARY 2001

Dutch environmental inspectorate arrests Sandrien, a ship-for-scrap claimed to be destined for breaking in Asia. The Inspectorate is investigating if the ship's departure to Asia for scrapping constitutes a violation of the Basel Convention-based European waste legislation prohibiting the export of hazardous wastes to non-OECD countries. Greenpeace has demanded that the Sandrien be decontaminated prior to export for scrapping.

HONGKONG, APRIL 29, 2000**PROTEST AGAINST P&O NEDLLOYD SHIP IN HONGKONG HARBOUR**

Greenpeace activists take action to protest proposed and continued dumping of ships in China by P&O Nedlloyd.

ROTTERDAM, APRIL 2000**GREENPEACE MEETS P&O NEDLLOYD TO CRITICALLY DISCUSS COOPERATION BETWEEN THE ANGLO-DUTCH COMPANY AND CHINESE YARD**

Greenpeace reiterates demand for decontamination before export. P&O Nedlloyd refuses to take hazardous substances out before exporting ships to Asia.

LONDON, MARCH 2000**GREENPEACE PRESENTS VIEWS AND DEMANDS TO SHIPPING INDUSTRY AND WORLD GOVERNMENTS AT IMO MEPC 44TH SESSION****BHAVNAGAR, INDIA, 19 FEBRUARY 2000****INDIAN SHIPBREAKERS COMMIT TO ENVIRONMENTAL QUALITY AND WORKERS SAFETY**

The outcome of a workshop on "Challenge to Ship Recycling Industry: Environment and Safety" was celebrated by industry, environmentalists and government. The Shipbreakers Association of India agreed to engage a drastic transformation of their yards to incorporate good working practices and proper environmental management. The Shipbreakers also supported the platform of decontamination of ships prior to dismantling. Maritime Authorities agreed to a Greenpeace/Ban (and other NGOs) team to run a fact-finding mission in the Indian yards.

BELGIUM, 21 DECEMBER 1999**BELGIUM GOVERNMENT ARREST UK "TOXIC" SHIP BOUND TO INDIA FOR SCRAPPING**

The Belgium Government arrested the bulk carrier MV FORTHBANK currently docked in Antwerp after receiving an unclear response from its UK owners on their intention to scrap the vessel in Alang, the largest shipbreaking yard in India. The Belgium Government understand that an European ship bound for scrapping in Asia is a hazardous waste export and subject to the EU hazardous waste export ban in place since 1998.

NEW DELHI, 10 DECEMBER 1999**GREENPEACE PREVENTS TOXIC DUMPING IN INDIA**

Having chained themselves to an anchor line overnight, Greenpeace activists successfully delayed the beaching of cargo vessel 'Clare' destined for breaking at Alang – the world's largest shipbreaking yard in India. The export of hazardous ships-for-scrap to Asian shipbreaking yards, such as the highly polluted and unsafe facility in Alang, is effectively toxic waste dumping. Indian Supreme Court orders an enquiry into Greenpeace's allegations of toxic waste dumping via ships-for-scrap.

NEW DELHI, 8 DECEMBER 1999**WEST CONTINUES TO SEND "TOXIC" SHIPS TO INDIA**

Greenpeace today highlighted the continuing dangerous practice of sending Western-owned or operated "toxic" ships to developing countries such as India for dismantling. Workers in developing countries are being exposed to asbestos and other poisons from ships broken up in unsound labour and environmental condition yards in India, Bangladesh,

China, Philippines and Pakistan. This morning, at Alang in western India – the world's largest shipbreaking yard - activists from the Greenpeace flagship the Rainbow Warrior painted warning signs on the hull of the Global Sao Paulo, a Greek operated vessel waiting to be dismantled. Another six vessels were in the area ready to be scrapped. Greenpeace displayed a banner in an inflatable boat in front of the yard to highlight the danger to workers caused by scrapping of toxics ships.

ROTTERDAM, 9 NOVEMBER 1999

GREENPEACE PROTESTS THE DUMPING OF TOXIC SHIPS TO ASIA
Greenpeace activists today protested plans to scrap the ocean carrier Tokio Express in China and demanded that its owner, Costamare Shipping and its operator Hapag-Lloyd ensure that hazardous materials are removed from the ship prior the scrapping. Activists painted warning messages in Chinese and Hindi on the hull of the ship while it docked at the port of Rotterdam. Hapag-Lloyd agrees to make an inventory of hazardous substances before the ship is sent for scrap. The inventory will be handed over to shipbreaking company.

MUMBAI, INDIA, 21 SEPTEMBER 1999 **TRADE UNIONS AND GREENS JOIN HANDS TO CHALLENGE DIRTY SHIPBREAKING IN ASIA**

The International Transport Workers Federation (ITF) has today joined hands with Greenpeace, Basel Action Network and Indian trade unions to highlight the occupational health and environmental hazards caused by ships contaminated with toxins exported to Asia for salvage and disposal – an operation known as shipbreaking.

BIELEFELD/HAMBURG, 10 MAY 1999 **GREENPEACE PROTEST GERMAN FOOD CO'S EXPORT OF ASBESTOS TO INDIA**

The German food company, Dr.Oetker, plans to scrap two asbestos-contaminated ships in Asia, disregarding the fact that this endangers workers there. Greenpeace exposed the plan today in a direct action at the Dr.Oetker office on the Jahnplatz in Bielefeld. This morning, Greenpeace activists placed a 20 x 12 ft 'blow-up' photo under the company logo depicting Indian workers breaking up ships with the caption reading, 'Dr.Oetker exporting cancer'. Below the company was accused of producing 'pudding powder for Germans - asbestos dust for Indians'.

HONG KONG, 12 APRIL 1999

P&O NEDLLOYD: STOP TOXIC TRADE
Greenpeace activists today symbolically returned highly carcinogenic asbestos, contained in a sealed drum to its rightful owner, shipping company P&O Nedlloyd, in Hong Kong and urged the company to stop dumping toxic waste ships in China. The action coincides with negotiations of a technical working group on the Basel Convention in Geneva, Switzerland, seeking to address issues of waste dumping from rich industrialised countries into less industrialized countries.

NEW DELHI, 18 FEBRUARY 1999

SHIPBREAKING IS DANGEROUSLY POLLUTING - GREENPEACE REPORT FINDS

Greenpeace today released the first ever technical and environmental data on the toxic contamination caused by shipbreaking in India through its investigative report "Ships for Scrap: Steel and Toxic Wastes for Asia." The report which was presented at a press conference in New Delhi confirms

allegations by trade unions and non-governmental organisations (NGOs) about the widespread contamination and occupational hazards at the Alang and Mumbai shipbreaking yards in India. However its implications reach far beyond India because similar conditions are known to exist in other shipbreaking states, particularly Pakistan, Bangladesh, the Philippines, China and Vietnam.

SINGAPORE, 11 JANUARY 1999
ENVIRONMENTALISTS PROTEST
TOXIC SHIP EXPORT TO ASIA

Greenpeace and Basel Action Network (BAN) activists escorted the toxic-contaminated ship Encounter Bay as it arrived in Singapore harbor this morning, to protest against the export of toxic waste to Asia. In a daring waterborne protest the environmental activists flew banners reading "P&O Nedlloyd Stop Toxic Trade" as the vessel approached the harbor. After it docked, they attached another giant banner to the side of the ship. Singapore is the fifth city where Greenpeace and BAN have protested against the ship as it makes its final journey before being scrapped.

AUCKLAND, NEW ZEALAND, 22
DECEMBER 1998

GREENPEACE, BAN TAKE ACTION
AGAINST P&O NEDLLOYD SHIP
"ENCOUNTER BAY"

Police arrest Greenpeace activists chained to ship to prevent ship's departure to Asian scrapping yard.

SYDNEY, AUSTRALIA, 18 DECEMBER
1998

Greenpeace takes action against P&O Nedlloyd ship "Encounter Bay."

Activists detain the ship by staying on board the ship for a full-day to protest the refusal of the company to

decontaminate the ship before export to Asia.

ROTTERDAM, THE NETHERLANDS,
17 NOVEMBER 1998

Action at P&O Nedlloyd headquarters. Greenpeace submits and explains demands to Director Van Slobbe.

BARCELONA, SPAIN, 15 NOVEMBER
1998

Greenpeace, BAN launch direct action against P&O Nedlloyd ship "Encounter Bay". Company refuses to decontaminate ship prior to export to Asia.

Activists hang banner reading "P&O Nedlloyd: Stop Dumping on Asia" on ship.

NEW DELHI, INDIA, 21 JANUARY
1998.

Greenpeace, Basel Action Network and Indian Trade Unions Join Hands to Protest Against the Export of Toxic ships-for-scrap to India.

A wide spectrum of individuals and organisations including activists from all the Indian central trade unions, people's movements and citizens' groups came together today in a peaceful and colorful protest against the US Government's decision to allow the US Navy and Federal Maritime Administration to export their toxic-laden ships to India, Bangladesh and Pakistan.

NOTE:

In addition to these activities Greenpeace has given presentations at various global events like the NOR(wegian)SHIP fare in Oslo, the First Global Shipbreaking Congress in Amsterdam, the Green Shipping Conference in Hamburg during the last 3 years. Greenpeace has also successfully placed the issue on the agenda of the Basel Convention on hazardous waste trade and the IMO.

¹ Submission by the International Chamber of Shipping to the “Ship Recycling Working Group” on 31 July 2000

² ARD Erstes Deutsches Fernsehen (First German TV), Report Mainz, November 23, 1998

³ Chapter XII, Sec 16 (i) (d). Extraordinary Gujarat Government Gazette Notification, Extra No. 640, dt/. August 31, 2000. Gujarat Maritime Board

⁴ OSPAR Commission for the Protection of the Marine Environment of the North-East Atlantic, Agreement 1997-15

⁵ Bürgerschaft der Freien und Hansestadt Hamburg Drucksache 16/3080. September 26, 1999. “Hamburg Baggergutkonzept” (Hamburg Parliament Dredging Sludges Concept)

⁶ German EPA/Umweltbundesamt, Daten zur Umwelt, Der Zustand der Umwelt in Deutschland 2000, Erich Schmidt Verlag & Co., Berlin 2001.(Environmental Data)

⁷ See page 19 of “Ships for Scrap: Steel and Toxic Wastes for Asia – A factfinding mission to the Indian shipbreaking yards in Alang and Bombay.” Greenpeace, March 1999.

⁸ See page 13, “Ships for Scrap II: Steel and Toxic Wastes for Asia – Worker health & safety and environmental problems at the Chang Jiang Shipbreaking yard operated by the China National Shipbreaking Corporation in Xiagang near Jiangyin.” Greenpeace, December 1999.

⁹ Contrast Advies for Greenpeace Netherlands, September 1999. “Asbestos: Deep in the very fibres of society – A summary report”

¹⁰ Lloyd’s List (Markets: Demolition), Wednesday, January 19, 2000. “Greenpeace strategy upsets Indian breakers.”

¹¹ “A certificate from the Master of the ship shall be presented to the Port Officer, at the time of submission of application under Clause (a) above, certifying that no dangerous gas, toxic or any other hazardous chemical/waste are present on board of the ship and certificate of entry as per section 36 of the Factories Act by competent person are produced.” Extraordinary Gujarat Government Gazette Notification, Extra No. 640, dt/. August 31, 2000. Gujarat Maritime Board.

¹² The Central Pollution Control Board states in its “Environmental Guidelines for Shipbreaking Industries” that: “Old vessels containing or contaminated with any of the above substances [PCBs, waste asbestos dust and fibre, lead and lead compounds] are accordingly classified as hazardous materials. The customs authority and/or the concerned State Maritime Board should ensure this and issue a certificate to this effect that the vessel is free from the prohibited materials.”

¹³ The Indian Supreme Court decided on 5 May 1997: “No import should be made or permitted by any authority or any person of any hazardous waste which is already banned under the Basel Convention or to be banned hereafter with effect from the date specified therein.”

¹⁴ (US) National Cancer Institute, Questions and Answers About Asbestos Exposure, last modified 27 Nov 2000, as distributed by www.meb.uni-bonn.de/cancernet/600321.html

¹⁵ Peto J, Decarli A, La Vecchia C, Levi F, Negri E. The European mesothelioma epidemic. *British Journal of Cancer*, 1999;79:666-672.

¹⁶ Contrast Advies for Greenpeace Netherlands, September 1999. “Asbestos: Deep in the very fibres of society – A summary report”

¹⁷ Publication IMO 1998.

¹⁸ Greenpeace Factsheet, September 1999: “TBT: A Global Problem for the Marine Environment.”

¹⁹ Maack, T., Greenpeace Germany : “TBT Hotspots in Europe”. September 2000.

²⁰ German Technical Regulation on Hazardous Substances, June 1996, relating to several hazardous substances which can enter the human body through skin.

TRGS 150, Technische Regeln für Gefahrstoffe, Unmittelbarer Hautkontakt mit Gefahrstoffen, die durch die Haut resorbiert werden können (Hautresorbierbare Gefahrstoffe), Juni 1996.

²¹ Mentioned in Kanthak, J. & A. Bernstorff, “Ships for Scrap II: Steel and Toxic Wastes for Asia – Worker health & Safety and Environmental Problems at the Chang Jiang Shipbreaking Yard operated by China National Shipbreaking Corporation, at Xiagang, near Jiangyin, China.