



Newsletter

● Edition: August 2026 | From Compliance to Capability: Building the Next Generation of Safe, Green and HKC-Compliant Ship Recycling.

HKC IS NOW IN FORCE

The Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships entered into force on 26 June 2025, placing worker safety, environmental protection, facility authorization, documentation and traceability at the centre of global ship recycling.



GreenHul Solutions

(Innovate, Sustain, Thrive)

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A New Operating Era for Ship Recycling

Ship recycling is no longer judged only by how efficiently steel is recovered. Today, a credible recycling facility must demonstrate a functioning management system, trained workers, safe operations, controlled hazardous-material handling, emergency preparedness, environmental protection, vessel-specific planning and verifiable records. The HKC creates a common international framework for this transition, supported by IMO/MEPC guidelines for facility authorization, safe and environmentally sound recycling, Ship Recycling Plans, surveys, inspections and hazardous-material inventories.

For Bangladesh, this is both a compliance responsibility and a strategic opportunity. The country can strengthen its position in the global recycling market by converting regulatory requirements into practical yard capability, stronger management discipline and internationally credible performance.

GreenHul Solutions Limited:

End-to-End Ship Recycling Support

GreenHul Solutions Limited (GSL) provides specialized technical, regulatory and operational consultancy for ship recycling stakeholders. Our work is designed to connect the requirements of the Hong Kong Convention with the realities of facility development, yard operations, workforce competence and vessel-specific recycling.

Our service approach covers the complete compliance journey—from assessing a facility's present condition to building systems, training people, preparing plans, supporting implementation and strengthening evidence for review and authorization.

Scope of Function of the Local Consultancy Firm (LCF)

The delegated scope of the Local Consultancy Firm is structured around practical facility transformation. GSL's LCF support framework covers the following core functions:

1. Gap Analysis and Transition Plan

Conduct a structured gap analysis to identify differences between the facility's current condition and the applicable HKC requirements and relevant IMO/MEPC guidance. Based on the findings, formulate a prioritized Transition Plan or compliance roadmap covering actions, responsibilities, resources, sequencing, target dates and evidence of completion.

2. Facility Development and Management-System Creation

Support development or upgrading of physical facilities and operational controls required for safe and environmentally

SRP:

Vessel-Specific Planning Before Recycling Begins

The Ship Recycling Plan is specific to the individual vessel. It should show how the facility will recycle that ship safely and environmentally soundly, taking account of the vessel's particulars, structure, condition, and Inventory of Hazardous Materials.

- Identification of the vessel and the authorized recycling facility.
- Integration of the vessel's IHM and location of hazardous materials.
- Planned recycling sequence, access arrangements and work-zone controls.
- Methods for removal, segregation, storage and management of hazardous materials and wastes.
- Safe-for-entry and safe-for-hot-work arrangements where applicable.
- Cutting, lifting and material-handling strategy and relevant risk controls.
- Emergency arrangements, worker protection and supervision.
- Records and evidence required to demonstrate implementation of the approved plan.

Scope of Delegated Authority to Technical Third Parties (TTPs):

Core delegated function: Document review of the Ship Recycling Plan (SRP) to check compliance with applicable requirements set out in the Hong Kong Convention and the relevant IMO Marine Environment Protection Committee (MEPC) Guidelines.

A robust TTP document review should provide an independent technical check that the SRP is complete, vessel-specific, internally consistent, and aligned with the facility's authorized capabilities and procedures.

The review should verify that the plan properly addresses the IHM, recycling methodology, hazardous-material controls, worker safety, environmental safeguards and other applicable HKC/MEPC requirements.

Important governance principle: LCF assistance and TTP review should remain clearly separated where independence or conflict-of-interest controls are required by the delegating authority. The LCF helps the facility build and document compliance; the TTP independently reviews the relevant document within its delegated mandate.

GSL's Practical Compliance Roadmap:

Stage	GSL Focus
1 Diagnose	Baseline assessment, document review, site inspection and prioritized gap register.
2 Plan	Transition Plan with actions, owners, resources, deadlines and verification evidence.
3 Develop	Facility upgrades, procedures, management controls, emergency systems and training framework.
4 Train	Competency-based capacity building for workers, supervisors and management.
5 Document	SRFP, SRP support, registers, checklists, forms, records and implementation evidence.
6 Implement	On-site coaching, drills, inspections, corrective actions and operational integration.
7 Verify	Readiness review, closure of gaps and support for regulatory/technical assessment.
8 Sustain	Internal audit, refresher training, performance monitoring and continual improvement.

Beyond Documents:

Building a Compliance Culture

The real test of HKC compliance is not whether a yard owns a set of procedures—it is whether those procedures are understood, practiced, supervised and recorded. GSL therefore emphasizes implementation: management ownership, worker participation, visible controls, practical drills, competent supervision, accurate records and continuous improvement.

This approach helps ship recycling facilities move from reactive compliance to a durable operating system capable of protecting workers, reducing environmental risk, strengthening regulatory confidence and meeting the expectations of responsible shipowners and international stakeholders.

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Bangladesh:

From Recycling Capacity to Global Leadership

Bangladesh played an important role in bringing the Hong Kong Convention into force, and its ship recycling industry now operates in a global environment where authorization, traceability and credible implementation matter more than ever. The Bangladesh Ship Recycling Board (BSRB) is identified by IMO as Bangladesh's Competent Authority under the Convention, while national support and approval mechanisms increasingly focus on facility compliance, training, SRP preparation and green-yard development.

The next chapter should be defined by safer work, cleaner operations, stronger technical competence and a transparent compliance culture. GreenHul Solutions Limited aims to contribute to that transition by turning international requirements into practical, yard-level systems that work.

GreenHul Solutions:

Wider Ship Recycling & Maritime Services

- Ship recycling management and project coordination.
- HKC / EU Ship Recycling Regulation / Basel-aligned compliance advisory.
- Yard assessment, compliance upgrading and implementation support.
- Environmental and occupational safety audits and monitoring.
- Inventory of Hazardous Materials (IHM) preparation/verification support.
- SRFP and vessel-specific SRP formulation assistance.
- Licensing, certification and regulatory documentation support.
- Transit-to-destination planning for end-of-life vessels.
- Stability, hydrostatic and related technical coordination for safe beaching/dismantling.
- Training, drills, management-system development and continuous-improvement programs.

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