

Shipbreaking and Recycling Industry

A qualitative research about the influence of neoliberal politics on the
shipbreaking and recycling industry in Bangladesh

Master's dissertation

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Abstract

The shipbreaking and recycling industry in Bangladesh is responsible for a controversial public debate due to its economic, environmental and social impacts. Therefore, this thesis aims to understand the influence of neoliberal politics in the shipbreaking and recycling industry in Bangladesh since its emergence until now. The research questions introduce debates about the connection between neoliberal politics and human development patterns. Through a qualitative methodology, using interviews, focus group and participant observations, this study researched who the dominant stakeholders are in the shipbreaking and recycling industry in Bangladesh, their impact and the role of the national context. The fieldwork in Bangladesh shows that the integration of neoliberalism into the Bangladeshi politics, through a business-driven policy, has permitted the creation of patterns of inequality in human development. These patterns are a result of the environmental and social impact of the shipbreaking industry in Bangladesh, wherein the dominant stakeholders in this industry have a significant role and responsibility towards sustainability and human development.

Keywords: shipbreaking and recycling industry, Bangladesh, neoliberalism, human development

Dutch summary

De scheepsbouw- en recyclingindustrie in Bangladesh is verantwoordelijk voor een controversieel publiek debat omwille van de economische, ecologische en sociale impact. Om die reden tracht deze masterproef inzicht te geven op de invloed van neoliberale politieke in de scheepsbouw- en recyclingindustrie in Bangladesh sinds de opkomst van de industrie tot nu. De onderzoeksvragen introduceren debatten over de samenhang tussen neoliberale politiek en menselijke ontwikkelingspatronen. Door middel van een kwalitatieve methode, met behulp van interviews, focusgroepen en observaties, onderzocht deze studie wie de dominante stakeholders zijn, hun impact en de rol van de lokale context. Het veldwerk in Bangladesh laat zien dat de integratie van neoliberalisme in de politiek van Bangladesh, door een bedrijfsgericht beleid, het creëren van ongelijkheidspatronen in de menselijke ontwikkeling heeft mogelijk gemaakt. Deze patronen zijn het resultaat van ecologische en sociale impact van de scheepsbouwindustrie in Bangladesh, waarbij de dominante stakeholders van deze industrie een significante rol en verantwoordelijkheid hebben ten aanzien van duurzaamheid en menselijke ontwikkeling.

Sleutelwoorden: scheepsbouw- en recyclingindustrie, Bangladesh, neoliberalisme, menselijke ontwikkeling

List of abbreviations

AL- Awami League

AF- Asia Foundation

BC- Basel Convention

BELA- Bangladesh Environmental Lawyers Association

BHRA- Business and Human Rights Association

BNP- Bangladesh National Party

BSBRA- Bangladesh Ship Breakers and Recyclers Association

BSRB- Bangladesh Ship Recycling Board

CNN - Cable News Network

CTG- Caretaker Government

DIFE- Department of Inspection for Factories and Establishment

EC- European Commission

ECSA- European Community of Shipowners Association

ESRR- European Ship Recycling Regulation

FIDH- Fédération Internationale pour les Droits Humains

GDP - Gross Domestic Product

GMS- Global Market Systems

GNP- Gross National Product

GoB- Government of Bangladesh

HD- Human Development

HKC- Hong Kong Convention

ICG- International Crisis Group

ILPI- International Law and Policy Institute

IMF- International Monetary Fund

IMO- International Maritime Organisation

IMO-NORAD SENSREC Project- International Maritime Organisation – Norwegian Agency for Development Cooperation, Safe and Environmentally Sound Ship Recycling Project

Mol- Ministry of Industries

NGO- Non-Governmental Organization

NGO-SP- Non-Governmental Organization Shipbreaking Platform

NOC- Non-Objection Certificate

OECD- Organisation for Economic Cooperation and Development

PHP- Peace, Happiness and Prosperity

PPE- Personal Protection Equipment

SRI – Shipbreaking and Recycling Industry

SRR- Shipbreaking and Recycling Rules

UNDP- United Nations Development Programme

UNEP- United Nations Environment Programme

UNIDO- United Nations Industrial Development Organization

WB- World Bank

WTO- World Trade Organization

YPSA- Young Power in Social Action

ZDF - Zweites Deutsches Fernsehen

List of tables

| | |
|---|----|
| TABLE 1. OVERVIEW OF THE INTERVIEWED STAKEHOLDERS | 30 |
| TABLE 2. OVERVIEW OF THE FOCUS GROUP | 35 |
| TABLE 3. OVERVIEW OF THE PARTICIPANT OBSERVATIONS..... | 37 |
| TABLE 4. FIELDWORK DATA OF THE IMPACT OF THE SRI IN BANGLADESH..... | 44 |

Table of Contents

| | |
|--|------------|
| ACKNOWLEDGEMENTS | I |
| ABSTRACT..... | II |
| DUTCH SUMMARY | III |
| LIST OF ABBREVIATIONS..... | IV |
| LIST OF TABLES | VI |
| 1. INTRODUCTION..... | 1 |
| 2. THEORETICAL FRAMEWORK | 3 |
| 2.1. THE SHIPBREAKING AND RECYCLING INDUSTRY IN BANGLADESH..... | 3 |
| 2.1.1 DEFINITION AND BACKGROUND OF THE SRI..... | 3 |
| 2.1.2 THE APPEARANCE OF THE SRI IN BANGLADESH | 5 |
| 2.2 NEOLIBERALISM | 6 |
| 2.2.1 THE EMERGENCE OF NEOLIBERAL POLITICS | 6 |
| 2.2.2 NEOLIBERAL GLOBALIZATION | 9 |
| 2.2.3 THE RISE OF DOMINANT CLASSES IN NEOLIBERALISM | 11 |
| 2.3 NEOLIBERALISM AT A LOCAL SCALE | 12 |
| 2.3.1 POLITICAL CONTEXT IN BANGLADESH | 12 |
| 2.3.2 THE EMERGENCE OF A BUSINESS-DRIVEN POLICY IN BANGLADESH | 14 |
| 2.4 HUMAN DEVELOPMENT..... | 16 |
| 2.4.1 THE CONCEPT OF DEVELOPMENT | 17 |
| 2.4.2 THE EMERGENCE OF HUMAN DEVELOPMENT | 17 |
| 2.4.3 INEQUALITIES IN HUMAN DEVELOPMENT | 18 |
| 3. METHODOLOGY | 20 |
| 3.1 FIELD RESEARCH: THE PRIMARY DATA..... | 21 |
| 3.1.1 INTERVIEWS..... | 23 |
| 3.1.2 THE STAKEHOLDERS OF THE SRI IN BANGLADESH | 25 |

| | |
|--|------------------|
| TABLE 1. OVERVIEW OF THE INTERVIEWED STAKEHOLDERS..... | 30 |
| 3.1.3 FOCUS GROUP..... | 35 |
| TABLE 2. OVERVIEW OF THE FOCUS GROUP | 35 |
| 3.1.4 PARTICIPANT OBSERVATION | 36 |
| TABLE 3. OVERVIEW OF THE PARTICIPANT OBSERVATIONS..... | 37 |
| 3.1.5 FIELDWORK NOTES..... | 38 |
| 3.1.6 PHOTOGRAPHY | 38 |
| 3.2 LITERATURE REVIEW: THE SECONDARY DATA..... | 39 |
| 3.3 VALIDITY AND RELIABILITY..... | 39 |
| | |
| <u>4. ANALYSIS.....</u> | <u>41</u> |
| | |
| 4.1 THE DOMINANT STAKEHOLDERS IN THE SRI IN BANGLADESH | 41 |
| 4.2 THE IMPACT OF THE SRI IN BANGLADESH..... | 44 |
| TABLE 4. FIELDWORK DATA OF THE IMPACT OF THE SRI IN BANGLADESH..... | 44 |
| 4.3 THE ROLE OF DOMINANT STAKEHOLDERS IN THE IMPACT OF THE SRI IN BANGLADESH | 54 |
| 4.3.1 EXTERNALIZATION OF COSTS..... | 54 |
| 4.3.2 POLITICAL INFLUENCE..... | 56 |
| 4.4 THE NATIONAL CONTEXT IN THE SRI IN BANGLADESH..... | 60 |
| 4.4.1 THE ROLE OF THE BANGLADESHI STATE..... | 60 |
| 4.5 THE ROLE OF THE DOMINANT STAKEHOLDERS IN THE SRI IN BANGLADESH IN PATTERNS OF HUMAN DEVELOPMENT | 65 |
| | |
| <u>5. CONCLUSION</u> | <u>68</u> |
| | |
| <u>6. DISCUSSION.....</u> | <u>69</u> |
| | |
| <u>BIBLIOGRAPHY.....</u> | <u>73</u> |
| | |
| SCIENTIFIC ARTICLES..... | 73 |
| BOOKS | 76 |
| REPORTS..... | 80 |
| GOVERNMENT DOCUMENTS | 82 |
| ONLINE SOURCES | 82 |

APPENDICES 86

APPENDIX 1: INTERVIEW WITH DR. Z.R. 86

APPENDIX 2: INTERVIEW WITH DR. N.Z. 87

APPENDIX 3: INTERVIEW WITH MR. A.S. AND MR. A.T. 89

APPENDIX 4: INTERVIEW WITH MR. A.N. 92

APPENDIX 5: INTERVIEW WITH DR. N.T. 95

APPENDIX 6: INTERVIEW WITH MR. K.M. 98

APPENDIX 7: INTERVIEW WITH MR. A.A. AND MR. A.B. 100

APPENDIX 8: INTERVIEW WITH MR. Z.S. 102

APPENDIX 9: INTERVIEW WITH MR. R.S. 104

APPENDIX 10: INTERVIEW WITH MR. J.K. 105

APPENDIX 11: INTERVIEW WITH MR. V.S. 107

APPENDIX 12: INTERVIEWS WITH WORKERS OF THE SHIPBREAKING YARDS OF CHITTAGONG. 108

APPENDIX 13: INTERVIEW WITH MR. M.F. 113

APPENDIX 14: INTERVIEW WITH MR. R.M. 115

APPENDIX 15: INTERVIEW WITH DR. N.D. 118

APPENDIX 16: INTERVIEW WITH MRS. J.R. AND MR. N.R. 120

APPENDIX 17: INTERVIEW WITH MR. C.E. 130

APPENDIX 18: INTERVIEW WITH MRS. D.W. 139

APPENDIX 19: INTERVIEW WITH MR. L.M. 147

APPENDIX 20: FOCUS GROUP WITH WORKERS OF THE SRI IN BANGLADESH 153

APPENDIX 21: PARTICIPANT OBSERVATION IN A SHIPBREAKING YARD IN CHITTAGONG 156

APPENDIX 22: PARTICIPANT OBSERVATION DURING A MEETING AT YPSA’S OFFICE IN SITAKUNDA. 158

APPENDIX 23: PARTICIPANT OBSERVATION IN A FISHING COMMUNITY IN CHITTAGONG 159

APPENDIX 24: PARTICIPANT OBSERVATION IN THE SHIPBREAKING YARDS IN CHITTAGONG 160

APPENDIX 25: PICTURES 162

APPENDIX 26: PERMISSION REQUEST TO VISIT THE SHIPBREAKING YARDS IN CHITTAGONG 169

APPENDIX 27: PERMISSION LETTER TO VISIT THE SHIPBREAKING YARDS IN CHITTAGONG 170

1. Introduction

As early as 1989, the shipbreaking and recycling industry (SRI) was brought to the attention of the world, mainly, by the Brazilian Sebastião Salgado, one of the most widely respected documentary photographers (Cairns, 2007). As reported by Cairns, Sebastião Salgado presented images of ships stranded on the beaches of the north of the city of Chittagong, in Bangladesh, and of the faces of the workers carrying the ship piece by piece from the beach to the shore-based cutting shops and market stands. While ships are designed, constructed and operated in an environment of high technology and legislative control, their disposal is usually undertaken in an extremely difficult environment with low cost, low technology, high labour content, high risk and minimally enforced legislation (Galley, 2014). For many years, the SRI in Southern Asian countries, such as Bangladesh, India and Pakistan, has operated without the public perception until the early 2000s when public and media attention to the industry grew (Sarraf, Stuer-Lauridsen, Dyoulgerov, Bloch, Wingfield & Watkinson, 2010). Western media as well as international organizations and academia highlighted several social and environmental issues in the SRI such as poor working conditions, child labour, violation of human rights, persistent deaths and injuries of the workers as well as damages on ecosystems within the surrounding environment (Sarraf et al., 2010). Some documentaries appeared with alarming images and slogans such as *“Hidden shame of ship-breaking industry”* transmitted by CNN, *“Where Ships Go to Die, Workers Risk Everything”* by National Geographic and *“Giftiger Tankerschrott für Bangladesch”* by ZDF (National Geographic, 2014; NGO-SP, 2014; Rivers, 2010). According to the European Commission (EC), this scenario alerted the international community and created a political momentum (EC, 2007). The shipbreaking practices on the beaches of Bangladesh, India and Pakistan are considered to have negative impacts on the environment as well as on the health and safety of the workers and adversely affect the local communities in the areas in which the shipbreaking activities occur (ILPI, 2016; Saiful Karim, 2018; Daems, 2019).

The SRI in Bangladesh is considered to be significant for both global shipping companies and for Bangladeshi's economy (Ahammad & Sujauddin, 2017; EC, 2016; Ferdousi, 2013; Rahman, 2017). According to Ferdousi, it can be considered that the SRI in Bangladesh has a national and international significance. On a national level by supplying steel and employment, while

on an international level by providing a final supposedly safe place for ships (Ferdousi, 2013). However, in recent years, Bangladesh has come under criticism due to shipbreaking practices, which are reported by the EC as harmful to both the environment and human health (EC, 2016). The negative image of the SRI in Bangladesh was exposed in the media by environmentally concerned Non-Governmental Organizations (NGOs) relating to labour, safety issues and the lack of a suitable management of environmental impacts (Parviainen, Lehtikoinen, Kuikka & Haapasaari, 2017). In line with Ahammad and Sujauddin (2017), this situation has directed the domestic and international regulatory frameworks and standards to be developed or implemented to the expectations and needs of different stakeholders in order to achieve safety and environmental advanced standards.

This status quo introduces debates on why the economic significance of the SRI in Bangladesh has not been able to avoid the created social impact, as well as why it has not taken into account the sustainability of the nearby environment in Chittagong. As a result of these concerns, this thesis aims to research in which way neoliberal politics have influenced the SRI in Bangladesh since its emergence until now. The argument of the thesis is that the integration of neoliberal politics into the politics of Bangladesh has influenced patterns of human development (HD) in the SRI in Bangladesh. Therefore, the following sub-research questions are addressed:

1. Who are the dominant stakeholders in the SRI in Bangladesh?
2. What kind of impact does the SRI cause in Bangladesh?
3. In which way does the dominant stakeholders in the SRI in Bangladesh influence the impact of the industry in the country in patterns of HD?
4. What features of the national context allow the impact of the SRI in Bangladesh?
5. In which way do the dominant stakeholders have a significant role in achieving patterns of HD in the SRI in Bangladesh?

To achieve the purpose of this thesis a qualitative methodology was applied, constituted by primary and secondary data. The primary data was collected through fieldwork by structured, semi-structured and unstructured interviews, a focus group, participation observation and fieldwork notes. The secondary data was based on reviewing relevant literature, based on books, scientific articles, reports, press release, government documents and documentaries.

This thesis is divided in six chapters. The chapter following the introduction is the theoretical framework. The second chapter provides a scientific base to the research and is grounded on the concepts of SRI, neoliberalism and HD. The third chapter provides information about the research methods used to achieve the objective of the thesis. The fourth chapter contains the analysis of the findings. The fifth and sixth chapters contain the conclusion and discussion of the primary and secondary data.

2. Theoretical Framework

The theoretical framework is based on relevant theory in order to provide scientific structure to the research, constituting a basis for the argument of the thesis. The thesis argues that neoliberal politics integrated into the politics of Bangladesh have influenced patterns of HD in the SRI in Bangladesh. Therefore, firstly, the definition of the SRI will be introduced as well as its background and appearance in the Southern Asian countries and, more specifically, in Bangladesh. The second concept to be addressed is that of neoliberalism, approaching its global emergence and the rise of dominant classes in the neoliberal political context. Furthermore, the concept of neoliberalism at a local scale will be analysed, in which the Bangladeshi political context will be presented in order to understand the integration of neoliberal politics in Bangladesh. The last concept focuses on HD in order to understand the influence of neoliberal politics on the impact of the SRI in terms of patterns of development.

2.1. The Shipbreaking and Recycling Industry in Bangladesh

2.1.1 Definition and background of the SRI

The SRI as described in the report of the World Bank (WB) of 2010 is *“an industry that converts, through the use of land, infrastructure, machinery and labour and the consumption of utilities, imported end-of-life-ships into steel and other recyclable items, which are sold on the market”* (Sarraf et al., 2010, p.10). The definition of the SRI, according to the Shipbreaking and Recycling Rules (SRR) approved by the Ministry of Industries (MoI) of Bangladesh, complements the first definition stating that the industry is a *“process of dismantling a vessel’s structure or disposal whether conducted at a beach or green recycling facility for dismantling ship”* (MoI, 2011, p.4). Larger ships have a high economic value as their materials such as non-ferrous metals, machinery and equipment are sold at the end of life for recycling,

repairing and re-use (Mikelis, 2018). In this way, the SRI can on the one hand reduce the need for mining, which is an environmentally damaging practice (EC, 2016), while on the other hand increase the environment's sustainability of natural resources (Sarraf et al., 2010). However, if not carried out in a safe and sound manner, ship recycling presents clear risks for both human health and the environment (EC, 2017).

In the beginning and between 1945-1970, the SRI was concentrated in the USA and in Europe (mostly in Germany, United Kingdom and Italy) where it was carried out in a highly mechanized way (Maruf Hossain, 2010; Rabbi & Rahman, 2017). As reported by the United Nations Industrial Development Organization (UNIDO) (2010), the high costs of waste management in the developed countries have opened up business opportunities for enterprises in the developing countries. This has been economically beneficial for waste collectors in developed countries to transport their waste to developing countries for re-use rather than to manage the waste internally (UNIDO, 2010). As a result, the SRI emerged in East Asia and since the 1980s in South Asia (Sarraf et al., 2010). In the countries where the SRI takes place, steel and other recycling materials from the shipbreaking yards provide a cheap supply of raw materials (Daems, 2019). Based on the most recent data, Bangladesh, India and Pakistan are the main ship recycling countries, with an average of 65-75% of end-of-life ships ending up every year on the beaches of these countries (Daems, 2019). As reported by the NGO-SP (2017), China and Turkey are the two other main destinations for ship recycling though, on average, of smaller vessels.

Dismantling ships into different parts is carried out in a yard or field in the form of dry-dock recycling, pier-breaking, slipway recycling or landing and beaching (ILPI, 2016; YPSA, 2005). Dry-dock and pier-breaking methods are considered the safest ones since they are considered to be environmentally and socially safer as a result of a suitable containing of pollution and a safer working platform (ILPI, 2016; NGO-SP, 2017). As reported by the EC (2016), dry-dock recycling is, consequently, more costly and the method of beaching is by contrast a cheaper and more profitable method. The beaching method consists on a ship which sails with maximum speed using its own power during the high tide and is forced to be beached over the intertidal muddy land (Sarraf et al., 2010). This method is considered dangerous to environment and human health due to the hazardous operations which are taken in the

intertidal zone (EC, 2016, NGO-SP, 2017; Pastorelli, 2014; Shahadat Hossain, Chowdhury, Abdul Jabbar, Saifullah & Ataur Rahman, 2008). In spite of this, amongst the referred methods of ship recycling, beaching is the most commonly used method in Bangladesh, India and Pakistan (EC, 2016). In the first quarter of 2019, from a total of 193 ships dismantled, 146 were sold to Southern Asian countries being dismantled by the use of the beaching method (NGO-SP, 2019). The world's leading exporters of steel scrap from 2010 to 2016 were the European Union, USA, Japan, Russia, Canada and Australia (Mikelis, 2018). According to Mikelis, the EU and the USA remain the two highest net exporters.

2.1.2 The appearance of the SRI in Bangladesh

The region of Sitakunda, on the coast of the Bay of Bengal, is located in Chittagong, a city with a major seaport and who has for centuries been renowned for its natural beauty and accessibility by sea (Cairns, 2007). In the 1960s, after a severe cyclone, the Greek ship 'MD Alpine' was beached on the coast of Sitakunda (Rabbi & Rahman, 2017). The ship was abandoned by the owner because of the economic impossibility of redemption (Maruf Hossain, 2010). After some time, the Chittagong Steel House brought the vessel and dismantled it (Rabbi & Rahman, 2017), obtaining steel which is an absent natural resource in Bangladesh (Maruf Hossain, 2010). Afterwards, the SRI remained undeveloped until 1971 when after nine-months of civil war ships were blocking the entrance to the Chittagong port, what led the Government of Bangladesh (GoB) to sell two of those ships to the only local businessman in the sector, Mr. Shirazul Chowdhury. The industry, with a commercial operation start in the early 1980s (Bhuiyan & Hassan, 2018), has grown in an exponential way over the last twenty years developing into the current major steel trading business (Mizanur Rahman, 2016; Rabbi & Rahman, 2017). The geographical concentration of shipbreaking yards in Bangladesh has been driven largely by locational advantages, benefits of necessary access to input supplies and enabling services as well as by proximity to re-rolling¹ mills for downstream processing of ship steel scraps (Ahammad & Sujauddin, 2017).

¹ Re-rolling is a process of heating and reshaping semi-finished steel products such as billets or plates from recycled ships (Mikelis, 2018). According to Mikelis, in South Asia there are large numbers of re-rolling mills making steel products, used for the construction industry. In this process steel does not reach its melting point and requires lower temperatures compared to the process of making new steel in a mill (Mikelis, 2018).

2.2 Neoliberalism

Following the background of the SRI in Bangladesh, the second part of the theoretical framework raises the starting point of the argument of the thesis, the understanding of the emergence of global neoliberalism and its main characteristics. The argument of the thesis insists to analyse the main features of neoliberal politics which provide a base to understand its integration into the Bangladeshi politics and the impact of the SRI in Bangladesh.

2.2.1 The emergence of neoliberal politics

Neoliberalism has its origins in the eighteenth-century liberal political theory and political economy (Hall, Massey & Rustin, 2013), emerging as a recognizable and diverse revolutionary movement seeking to influence and appropriate the powers of national and international organizations, including states (Dean, 2014). The roots of neoliberalism lie in the writings of the economist Friedrich Hayek whose reinvention of classic liberalism in the 1930s and 1940s became increasingly influential in the last decades of the Cold War and beyond (Kingfisher & Maskovsky, 2008). The restructuring of state forms and of international relations after the Second World War was designed to prevent a return to the catastrophic conditions that had threatened the capitalist order in the great collapse of the 1930s, in order to prevent the re-emergence of inter-state geopolitical rivalries that had led to the war (Harvey, 2005). The 1950s and 1960s generally were periods of sustained capital accumulation throughout the world with high rates of economic growth and considerable social advance, including in the developing world (Kiely, 2005). By the late 1960s, Kiely highlights that it was clear that there were considerable tensions in the system. As Keynesian social and economic policies vacillated in the advanced industrialized nations of the global North, and as the capitalist success of the Cold War's end brought a significant geopolitical realignment of economic development policy in the global South, neoliberalism considerably expanded its influence (Kingfisher & Maskovsky, 2008). As a political ideology, neoliberalism sustained by Friedrich Hayek and Milton Friedman is, according to Giroux (2005), stricter than the classic liberal

economic theory developed by Adam Smith and David Ricardo in the eighteenth and nineteenth centuries. The free market was the organizing principle under laissez-faire² capitalism, regulated capitalism was the organizing principle under Fordism³, and unrestricted free-market competition is the organizing principle of the global neoliberal system (Bonnano, 2017). In agreement with Peck and Tickell (2007), Keynesian politics were typically interiorized focused on the regulatory needs of national economies and adjusted to national populations. On the other hand, neoliberal politics tend to be more exteriorized, in terms both of their orientation to a globalizing and financializing economy and their acting to pursue a foreign policy (Peck & Tickell, 2007). By the end of the 1970s, it was clear that the old neo-Keynesian policies that had helped to promote the post-war expansion were now part of the problem (Kiely, 2005). According to Kiely, these policies were exacerbating the problem of inflation in a context of slower productivity growth, variable profits, variable exchange rates and high state expenses. In this manner, neoliberal programs were first mobilized following the geo-economic crises of the early 1970s (Brenner & Theodore, 2002). As reported by Brenner and Theodore, these crises destabilized the Fordist accumulation regime, decentred the established role of the national scale as the predominant condition for state regulation, and undermined the coherence of the national economy as a target of state policies. As a consequence, neoliberalism gained an initial widespread prominence during the late 1970s and early 1980s as a strategic political response to the sustained global recession of the preceding decade, becoming the dominant political and ideological form of capitalist globalization (Brenner & Theodore, 2002). However, neoliberalism emerged and has been shaped by contestation with Keynesian economists, public-sector workers, anti-privatization activists, traditional as well as social-democratic conservative politicians (Peck & Tickell, 2007).

² Laissez-faire applies that the state should be self-limiting in its interventions, that it should practise laissez-faire with respect to individual and particularly entrepreneurial practices in the market-place, out of self-interest in maximising the accumulation of monetary wealth and power within its sovereign jurisdiction (Harvey, 2014).

³ The Fordist system, being the period between 1947 to 1973 considered the era of 'high Fordism', was based on highly capital-intensive machinery, inflexible divisions of labour within the workplace, a period where unprecedented rates of economic growth were achieved by the extension of mass productions systems (Kiely, 2005).

The organizing principle of the neoliberal system is the unrestricted free-market competition (Bonnano, 2017) which sustains that markets allocate resources in the most efficient way and that state intervention distorts allocative processes (Murray, 2006). In the features of free market employed by classical proponents of neoliberalism, market impartiality achieves not only the same objectives proposed by the old *laissez-faire* system, it allows the full and unrestricted participation of large corporations as well (Bonnano, 2017). According to Bonnano, for the proponents of classic neoliberalism, in order to achieve a free market based on equal opportunity and fair competition, the system is based on unrestricted access and economic efficiency. In this way, state sovereignty over commodity and capital movements is voluntarily surrendered to the global market (Harvey, 2014). In line with Kiely (2005), the emergence of neoliberalism was justified by the fact that pro-free market policies would lead to substantial trade and investment opportunities based on countries exercising their comparative advantage⁴ in the world economy. In this way their most cheap and efficient goods are produced and sold in the world market (Kiely, 2005). The neoliberal ideology assumes that the reduction of state interventions in economic and social activities and the deregulation of labour and financial markets, as well as of business and investments, have liberated the enormous potential of capitalism as an optimal mechanism for economic development (Navarro, 2007). The neoliberal thought proposes that the elimination of poverty can best be secured by liberating individual entrepreneurial freedoms and skills within an institutional framework characterized by strong private property rights, free markets, and free trade (Harvey, 2006; Harvey, 2014). A further significant difference between neoliberal capitalism and the classical free market *laissez-faire* referred by Bonnano (2017) is that neoliberalism proposes a form of capitalism that is not concerned with the achievement of socio-economic equality or positioning democracy and the rule of the majority at the centre of the organization of society. Neoliberalism is even considered by Peck and Tickell (2007) as a relatively opportunistic ideology that is powerfully shaped by both the crises it claims to resolve and by the (de)regulatory dilemmas generated by its own failures,

⁴ The theory of comparative advantage was first formulated by David Ricardo, who pointed out that a 'win-win' situation should satisfy certain conditions such as for free trade to be mutually beneficial, the factors of production (land, labour and capital) must be immobile and countries must have equal capacities to produce goods (Kiely, 2005).

limits, and contradictions. Nevertheless, neoliberals insist that it was the restraints on and not the excesses of the market that assume the responsibility for its manifest disaster (Hall, Massey & Rustin, 2013). Market failures arise as a consequence of the so-called externality effects (Harvey, 2014). As claimed by Harvey, the most obvious field of externalities is pollution, where firms and individuals do not pay for damaging effects on air, water and land qualities through their actions. Externalities are defined by Harvey as real costs for which capital does not have to pay. This means that pollution that is dropped into the environment or on to others is free of charge (Harvey, 2014). So as Harvey, Wallerstein (2004) states that the least expensive way for a producer to deal with a waste is external and pretending it does not exist, in which *“someone must pay for the negative consequences”* (Wallerstein, 2004, p.48). This externalized character of neoliberalism is clarified once part of its political programme in recent times has been to externalise the costs of social reproduction as much as possible into the general population at large in order to raise the profit rate for capital by reducing its tax burden (Harvey, 2014). According to Harvey, even some economists recognize the need for state interventions, compensatory taxes and regulatory action in such a situation of market failure. Neoliberalism is a system of endless capital accumulation and economic growth no matter what the social, ecological, or political consequences are (Harvey, 2014). An unequal distribution of benefits and burdens, due to an international and national uneven distribution of power, leads to an ecological distribution conflict (Demaria, 2010).

2.2.2 Neoliberal globalization

Globalization is a central driving force behind the fast social, political and economic changes that are reshaping modern societies and world order (Kiely, 2005; Siddiqui, 2012). The principal point from a globalization perspective is that neoliberalism exposes itself to flows in investment and trade, facilitating the penetration of transnational corporations, which allows the greater articulation of global networks into the local contexts (Murray, 2006). However, neoliberalism must not be considered as identical or synonymous with globalization (Adham, 2005). Globalization reflects a long period tendency in the capital accumulation process rather than just being a result of the rising influence of neoliberal policies (Kotz, 2000). According to Harvey (2007) and Navarro (2007), the supporters of neoliberalism defend that the worldwide implementation of neoliberal practices has led to the development of globalization of the economic activity, generating a period of enormous economic growth

worldwide associated with a new era of social progress. Since the early 1970s, the global capitalist system, led by the USA and the United Kingdom, has increasingly followed a neoliberal agenda, leading during the late 1970s and 1980s to a strongly promotion of neoliberalism by the conservative Thatcher and Reagan administrations (Adham, 2005). Neoliberalism has emerged as a dominant ideology spreading into the public policies of numerous governments in developed and developing countries and of international agencies such as the International Monetary Fund (IMF), the WB and the World Trade Organisation (WTO) (Hilgers, 2012; Murray, 2006; Navarro, 2007; Thomas, 2001). These institutions have expanded Western financial and commercial interests through their policies (Giroux, 2005). This has provided an important legitimisation for the business of private investors and transnational corporations, whose vision and behaviour in most cases are strengthened by Western norms (Thomas, 2001). Neoliberalism, as the supporting ideology of globalization, Western model of civilisation and/or development is placed as the model to follow and the basis upon which a developing country must accommodate its market(s), policies and populations in order to achieve development (Heron, 2008). As referred by the IMF, those countries that are more likely to direct themselves on a path of convergence with advanced economies are those that align themselves with the forces of globalization and embrace the necessary reforms such as liberalizing markets and pursuing disciplined macroeconomic policies (Kiely, 2005). However, in regions where the social state was nearly non-existent, the implementation of neoliberal policies did not happen in a way identical to that observed in the developed countries (Hilgers, 2012). The more specific features of the emerging neoliberal regimes in developing countries are their pro-market policy preferences, illustrated by an assessment of the scope and extent of their preferred neoliberal policies such as privatization, deregulation, and liberation (Haque, 1999). In this way, according to Haque, the role of the state has reduced, and market forces have increasingly assumed the socioeconomic role. If globalization describes a new form of production that creates new relations of markets and states in an international setting, then the concept of neoliberalism is often invoked to make reference to the specific market-triumphalist manner in which capitalist globalization has been shaped and reproduced in recent decades (Kingfisher & Maskovsky, 2008).

2.2.3 The rise of dominant classes in neoliberalism

The history of neoliberalism is either a utopian project providing a theoretical pattern for the reorganization of international capitalism or a political scheme aimed at re-establishing the conditions for capital accumulation and the restoration of class power (Harvey, 2007). The 1970s globally considered to be a period where business refined its ability to act as a class, needing a political class instrument and a popular base to pursue their financial interests within the ruling classes and elites (Harvey, 2006). Harvey (2005) and Navarro (2007) sustain that neoliberalism has not proven effective at revitalizing global capital accumulation. On the contrary, it has succeeded in restoring class power (Harvey, 2005; Navarro, 2007). According to Siddiqui (2012), neoliberalism is designed to serve the interest of the most powerful elements of society. Neoliberalism frequently reveals opportunities for well-connected officials to informally control market and material rewards which allow them to pursue their own interests (Springer, 2011). Class interests have been active in imposing neoliberalism in the world, sharing economic interests, concerning the maintenance of stability and a favourable climate to business (Hall, Massey & Rustin, 2013). If neoliberalism has been a means for the restoration of class power, then it should be significant to identify the class forces behind it and those who have benefited from it (Harvey, 2005). In agreement with Navarro (2007), the major beneficiaries of these policies are the dominant classes of both the developed and the developing countries, who have established worldwide class alliances that are primarily responsible for the promotion of neoliberalism. The huge increase in inequalities is therefore the direct result of the growth in income and well-being of the dominant, which is a consequence of class-determined public policies (Navarro, 2007). According to Hall, Massey and Rustin (2013), neoliberalism has sought a favourable climate towards business across the globe, demanding low tax regimes, limited state interference and unrestrained access to markets as well as creating unevenness. In this manner, the neoliberal restructuring of the state prioritizes individual freedom over the democratic rule of the majority (Bonnano, 2017). However, state conceptions in the neoliberal age are deeply shaped by the specificities of the states in study (Hilgers, 2012). In line with Hilgers, the state has been often considered an essential component of neoliberal transformation. The legitimacy of the state depends on economic growth, which is determined by its ability to shape a framework within which individuals are free to pursue their individual interests (Hilgers, 2012).

2.3 Neoliberalism at a local scale

This sub-chapter considers the integration of neoliberal globalization into the local level. Therefore, the Bangladeshi political context will be analysed in order to contextualize the development of neoliberal politics in the country. This way, it allows to understand the influence of neoliberal politics on the impact of the SRI in Bangladesh.

Neoliberal policy is premised upon a “*one size fits all*” model (Brenner & Theodore, 2002, p.353), which assumes that identical results will follow the imposition of market-oriented reforms rather than recognizing the extraordinary differences that arise as neoliberal reform proposals are enforced within contextually specific institutional landscapes and policy environments (Brenner & Theodore, 2002). The dominance of neoliberalism was politically produced in and across a range of local settings before it acquired a more diffuse ideological form in combination with multiple sources of state and social power (Peck & Tickell, 2007). In line with Kingfisher and Maskovsky (2008), it is significant to stress neoliberalism’s instabilities, partialities and articulations with other cultural and political-economic formations, directing attention to the ways that culture, power and governing practices combine into existing governmental regimes with their associated patterns of inequality. According to Hilgers (2012), even if a theory has universal ambitions, implementations or effects always happen in a reality with its own historical, social and economic configuration, being necessary to understand neoliberal implementation and its variations. This process is defined as a process of neo-liberalization, articulated through historically and geographically specific strategies (Brenner & Theodore, 2005). The analysis of cultural politics and economics of neoliberalism points to the need to explore in what way neoliberal policies succeed at the level of everyday life through the language of privatization (Giroux, 2005).

2.3.1 Political context in Bangladesh

The People’s Republic of Bangladesh has reached its independence from Pakistan in 1971, after a national war, the Liberation War (ICG, 2015). The Prime Minister Sheikh Mujib who had led the country to liberation had rejected multiparty democracy in favour of a single-party rule early in 1975 (Hossain, 2007). As stated by Hossain, a state of emergency had been declared among a political and economic crisis, including the 1974 famine that affected

millions of people, generating a general disappointment with Mujib which resulted in a series of coups following his assassination. By the early part of 1975, the regime abandoned a totally pluralist form of democracy and became a near totalitarian state with the Awami League Party (AL), experiencing in the same year a military coup (Hassan & Raihan, 2018). The military leader General Rahman, who later became the founder of the Bangladesh National Party (BNP), was in power in late 1975 (Hossain, 2007). General Rahman remained in power until his assassination in 1981 (Hossain, 2007). Thereafter and as reported by Hassan and Raihan (2018), General Ershad took over power through a coup in 1982. In 1990 he got exiled from power due to a political movement led by both the AL and the BNP as at the military regime declined to further support him at the end of his rule (Hassan & Raihan, 2018). A two-party system consisting of the AL and the BNP was established in the political arena of Bangladesh and they have ruled the country alternately since the 1990s (Kabir, 2013). Since 1991, when a parliamentary system was re-established, the tension between AL and BNP has increased (AF, 2017). These two parties have switched power, for the last decades, leaving out a general lack of debate in the parliament about important concerns such as education and health (ICG, 2015). In 2007, a military-backed caretaker government (CTG) was created to rule temporarily during the transition from one to another elected government, remaining in rule for two years until the parliamentary elections in 2008 (AF, 2017). Since 2014, AL is in charge, which will remain unchanged, considering its victory on the 11th parliamentary elections on the 30th of December of 2018 (The Economist, 2018). The aspirations for the establishment of a democratic political order in Bangladesh have been undermined by violent conflict and repeated military takeovers (Brass, 2010). The history of Bangladeshi politics is characterized by instability, violence, disregard of the parliament, dependence on street agitation, commercialization (Nazrul Islam, 2016) as well as criminalization of politics (Sarker, 2008). Commercialization of politics means that money is used by the business entrepreneurs and “*all those*” (Nazrul Islam, 2016, p.78) who want to enrich and accumulate capital quickly, to get elected to the parliament and have influence in the ministries. The business community has become politically stronger throughout the decades, increasing dominance over party, parliament, and electoral political processes (Hassan & Raihan, 2018). While less than 30% of the member of parliaments elected in the 1970s were businessmen, more than 50% of the member of parliaments in the fifth, eighth and ninth parliaments belong to this category (Jahan & Amundsen, 2012). As reported by Hassan and Raihan, (2018), given the fragile

democratic legitimacy of political elites, they felt that they needed to prioritize the simultaneous building of developmental legitimacy. Hence, the incentives encourage and promote the private sector by supplying a reasonable degree of predictability and stability in the economic domain of a country largely deprived of natural resources (Hassan & Raihan, 2018).

2.3.2 The emergence of a business-driven policy in Bangladesh

Up until the independence of Bangladesh in 1971, the state formulated an economic growth policy in which a strategy was established in order to achieve high rates of economic growth through private investment (Kabir, 2013). As a result of the limited private entrepreneurial capacity to satisfy the space left by the abrupt withdrawal of the Pakistani entrepreneurs, the GoB had to assume control over all the abandoned enterprises (Sobhan, 2002). After the independence in 1971, the ruling party in Bangladesh nationalized 47% of the abandoned industrial properties controlled by Pakistanis and Bengali Muslim properties in jute, cotton textiles, sugar, investment and insurance (Kochanek, 1996), pursuing a state-led development (Sarker, 2008). As stated by Kabir (2013), the country's first president Sheikh Mujib adopted a socialist economic approach with a view to eliminate poverty and to achieve rapid economic growth after the Liberation War. Mujib's government however, first faced external pressures to take the initiative to liberalize the economy mid-1975 (Kabir, 2013). During 1972-1982, a public sector-dominated economic strategy ruled due to political economic priorities (Hassan & Raihan, 2018). Despite of this, public enterprises suffered sustained losses (Bhaskar & Khan, 1995). According to Khan (1989), the supporters of private enterprise in Bangladesh highlighted the poor performance of the public sector enterprises and the large financial deficits which have burdened the budget, emphasizing the loan repayment performance of the private sector. As a consequence, and reported by Hassan and Raihan (2018), in the governance period of 1975-1982, Bangladesh experienced a dramatic shift in economic strategy. By abandoning a public-sector-led policy to embrace a private-sector-led development, Bangladesh tried to attract new entrepreneurs and to encourage private-sector-led industrial growth (Hassan & Raihan, 2018), dissociated from the state (Kochanek, 1996). Since 1976, different regimes have pursued the policy of economic liberalization, a substantial deregulation that has covered the way for private sector participation in the economic sphere (Sarker, 2008). In 1982 General Ershad's regime announced a New Industrial

Policy in which six hundred and fifty industrial and commercial enterprises were transferred to private ownership by 1986 (Bhaskar & Khan, 1995). President Ershad held power with the declared objective of improving the economic conditions in the country, particularly for the industrial sector (Khan, 1989). Such a manner of state–business relations resulted in the creation of significant numbers of local entrepreneurs and capital formation in the private sector, which perhaps explains the growth acceleration noticeable during Ershad’s rule (Hassan & Raihan, 2018). Privatization had its greatest impact on jute textiles, the Bangladesh’s premier industry and export earner (Bhaskar & Khan, 1995). So as reported by Bhaskar and Khan, until 1995, General Ershad’s privatization program was even documented as one of the largest in the world. In order to legitimize their unconstitutional power base, the military regimes of General Rahman and General Ershad sought support from different coalitions, including the civil bureaucracy and the business elites (Sarker, 2008). As reported by Sarker the business community offered them political and financial support in return for state’s legal and illegal as well formal and informal economic and political privileges. These privileges included discouraging relevant financial institutions from effectively designing and implementing stricter credit policy disregarding large-scale tax evasions and non-enforcement of legal provisions from the state (Sarker, 2008). Since the dramatic political changes in 1975, characterized by an interrupted democratic system by the military invasion in the same year and a conflict that continued until 1990, military regimes accelerated the process of the introduction of neoliberal policies in Bangladesh (Kabir, 2013). As supported by Kabir, the military rule in Bangladesh was seen as fertile ground to initiate such neoliberal policies in various sectors. This was particularly the case in commerce, finance, industry and agricultural sectors (Kabir, 2013). The period between 1991 and 2010 is characterized by the growing influence of business actors in the political and economic governance of Bangladesh, which were manifested on their control over resources, formal institutions and electoral political process in general, shaping policy outcomes in relevant parliamentary committees, governing administrations of public banks and other regulatory bodies (Hassan & Raihan, 2018). In this way, decentralized governance has been a declared objective of all regimes in Bangladesh which have only fulfilled the interests of the clientelist groups, as stated by Sarker (2008). According to Nazrul Islam (2016) as well as to Hassan and Raihan (2018) Bangladesh has gone through a primitive capitalist accumulation strategy based on support for a few politically connected and partisan business actors. The main benefactors however are the

multitude of business individuals with no political identity (Hassan & Raihan, 2018; Nazrul Islam, 2016). These business individuals created a proactive form of market-led corruption, as well as a considerable rent-seeking and control through resources (Hassan & Raihan, 2018). These forms of market-led corruption have influenced the political and economic governance in Bangladesh (Hassan & Raihan, 2018).

Bangladesh has introduced neoliberal policies since the 1970s-1980s (Kabir, 2013; Sobhan, 2002) and was the first country in South Asia to liberalize its economy (Hassan & Raihan, 2018). The Bangladeshi state has in this way been pro-business, in agreement with Hassan and Raihan (2018), manifesting symptoms of a '*soft state*' (Hassan & Raihan, 2018, p.105). Such a reversal from public to private policy and ideology in Bangladesh received the enthusiastic support of conservative politicians, pro-market senior bureaucrats and most importantly, Western nations (Hassan & Raihan, 2018). The fundamental theoretical idea for the reforms has been the need to reduce the role of the state in economic management whilst enhancing the role of the market in guiding economic choices (Sobhan 2002). This set the stage for the pro-market economic reforms under the guidance of the WB and the IMF (Hassan & Raihan, 2018; Sobhan, 2002). Many aspects of the liberalisation era do need to be understood within a national frame (Venkateswar & Bandyopadhyay, 2016). However, it would be intellectually dishonest to entirely disregard the intimate relationship between liberal political economy and institutional forces of globalization such as the IMF and WTO (Murray, 2006; Venkateswar & Bandyopadhyay, 2016). The International Financial Institutions and the ruling civil-military elites worked together to consolidate power and adopt neoliberal policy in various sectors in Bangladesh (Kabir, 2013). A combination of the external pressure and domestic politics were crucial in enabling space for the state to formulate and adopt business-friendly regulatory and economic policies (Hassan & Raihan, 2018).

2.4 Human development

The concept of development, and more specifically of HD, sustains the argument of this thesis as it clarifies in which way the influence of neoliberal politics on the SRI in Bangladesh can be debated in terms of development patterns. As a result, a theoretical framework is presented

to analyse development patterns under neoliberalism, leading to a reflection about the concept of HD in the SRI in Bangladesh.

2.4.1 The concept of development

The historical roots of development and those of East-West politics lie in the political rearrangements that occurred after the Second World War (Escobar, 1995). Development is considered an historically and singular experience (Escobar, 1995) and the distinctive process of a society's movement through time (Hooper, 2005). Chowdhury and Panday (2018) define development as the use of the productive resources of the society to improve the living standards of the poorest people with improvements in the natural, economic, social, cultural, and political conditions. In this way, development requires the removal of the major sources responsible of a lack of freedom such as poverty, tyranny, poor economic opportunities, social deprivation, disregard of public facilities as well as intolerance or overactivity of repressive states (Sen, 1999). From the economic development theories of the 1950s to the "*basic human needs approach*" (Escobar, 1995, p.5) of the 1970s not only economic growth was emphasized as such as in earlier decades but also the distribution of the benefits of growth. In the 1970s, the primary development concerns were to undertake state-initiated programs to achieve redistribution with growth and to ensure the satisfaction of basic needs and to enhance people's participation (UNDP, 1996). Development has always been a politically and culturally contested project (Khoday, 2018).

2.4.2 The emergence of human development

Economic growth is measured by the Gross National Product (GNP) and the Gross Domestic Product (GDP) (Peet & Hartwick, 1999). However, and according with Fukuda-Parr (2003), economic growth is only a means and not an end in itself. GNP or individual incomes can be very important as a means to expanding the freedoms of people (Sen, 1999). Yet they still depend on other determinants such as social and economic arrangements and political and civil rights (Sen, 1999). Development means more than economic growth since it focuses on the conditions of production, not ignoring the environmental and social consequences affected by the economic activity (Peet & Hartwick, 1999; Sagar, 1998). Consequently, the concept of HD presented an alternative to take in account social and cultural variables within

society (Peet & Hartwick, 1999). Since that time, the HD approach has evolved and focused more on the agency aspects of HD such as political freedoms and institutions as well as political processes (Fukuda-Parr, 2003). Such freedoms have two fundamental aspects, freedom of well-being, represented by functioning and capabilities, and freedom of agency, represented by voice and autonomy (UNDP, 2016). Developing the role of enhanced human capabilities and human agency, the HD approach seeks to achieve a broader path to freedom (Fukuda-Parr, 2003), involving a systematic examination of how human beings in each society live, including their state of education and health care among other variables (Sen, 2000). The HD principles need adaptation to local constructs of nature and society (Khoday, 2018), as some barriers are deeply embedded in social and political identities and relationships such as violence, discriminatory laws, exclusionary social norms, imbalances in political participation and unequal distribution of opportunities (UNDP, 2016). According to the UNDP, in order to overcome these barriers, empathy, tolerance and moral commitments to global justice and sustainability must be at the centre of individual and collective choices. According to Neumayer (2010), the literatures and debates on HD and sustainability share mutual aspects despite of have been separated. In the author's perspective, HD is essentially what sustainability advocates to sustain and without sustainability, HD does not exist. The HD approach considers sustainability to be a matter of distributional equity, both within and across generations (UNDP, 2016). In fact, with their respective emphasis on capabilities, ability and capacity, HD and sustainable development share the basic view that development is about enabling people (Neumayer, 2010). However, as reported by the UNDP (2016), HD has been uneven, and human deprivations persist, which would require a reformed global governance with fairer multilateralism in order to attain universal HD.

2.4.3 Inequalities in human development

The rethinking of development economics is undoubtedly linked to the end of neo-Keynesianism and the rise of neoliberalism throughout the world (Escobar, 1995). The adoption of liberal policies by the developing countries was expected to attract investments, encourage trade and promote longstanding growth with the promise of higher wages and better living conditions, similar to the process of economic growth experienced by the developed countries (Kiely, 2005). According to Kiely, this is achievable by the developing countries through cheap labour. The availability of cheap labour and natural resources along

with the inadequate control of environmental pollution in the developing countries have persuaded the multinational companies to shift some investment allocation to these countries (Siddiqui, 2012). Bonnano (2007) maintains that neoliberal globalization permitted the introduction of practices that expanded the exploitation of labour and its political control. The economic differentiation between developing countries has led to a renewal of the development model of neoliberalism which essentially pointed to a model to follow even if this approach ignored unequal development of the global economy as well as specific social and political features within countries (Kiely, 2005). Harvey (2007) describes under the rubric of accumulation by dispossession an historical-geographical trajectory of capital accumulation based in the increase of connectivity across space and time, evidenced by deepening uneven geographical developments. The politics of accumulation by dispossession assume control as a primary means for the extraction of income and wealth from vulnerable populations, including the working classes (Harvey, 2014). The neoliberal emphasis on economic growth evidenced that social development was not being enhanced, rather the deterioration of human patterns was increasingly more prevalent (Thomas, 2001). As reported by the UNDP, during this whole process of liberalization, adjustment and privatization, concern for the poor was pushed to the background (UNDP, 1996). Neoliberalism has promoted a development strategy that emphasizes efficiency, growth and competitiveness over social justice and redistribution (Heron, 2008). In a neoliberal system, an endless capital accumulation implies that the neoliberal system must be geographically expanded across the globe (Harvey, 2014). As supported by Harvey (2006) uneven geographical development is linked by surpluses available in one territory and with the lack of supply elsewhere, allowing the capitalistic system to coordinate the dynamics of capital accumulation through uneven geographical development. During the closing decades of the twentieth century, a neoliberal vision dominated the global development policy agenda, while the problems of inequality intensified (Thomas, 2001).

Neoliberal policies have emerged with serious implications for sustainable development in developing countries (Haque, 1999). In this manner, the global dominance of neoliberalism has been highly uneven, both socially and geographically, and its institutional forms and socio-political consequences have contrasted significantly across spatial scales (Brenner & Theodore, 2002). The market is spatialized and how that spatiality works has consequences

for uneven geographical development (Harvey, 2001). The unevenness in the global capitalist system is largely described as one of the neoliberalism's limits as well as the ability of the subordinated, productive and subaltern classes to contest the terms of their exploitation and exclusion (Harvey, 2005). Bonnano (2017) states that Inequality is an outcome of the good functioning of the economy and an appropriate condition of the desirable organization of the society. Neoliberalism encourages in this manner the most enthusiastic aspirations of private accumulation and a disordered reallocation of collective resources (Mitchell, 1999). By emphasizing neoliberalism's limits, important insights are presented into the ways patterns of inequality are produced and reproduced in the twentieth-first century (Kingfisher & Maskovsky, 2008).

As conclusion of the second chapter, the key elements in the theoretical framework of this thesis were presented throughout the concepts of the SRI followed by those of neoliberal globalization and HD. Positioning the features of global neoliberalism at a local level allows to understand the appearance of a business-driven policy in Bangladesh, grounded on the analysis of the Bangladeshi political context. The emergence of neoliberal politics in Bangladesh and the creation of inequalities in a neoliberal context generate debate on the impact of the SRI in Bangladesh in patterns of HD, in which the dominant stakeholders in the industry have a significant role.

3. Methodology

This chapter describes the qualitative methodology applied to achieve the objective of this thesis. A qualitative research method was chosen as this method is characterized by understanding the world through interaction, empathy and interpretation of the actions and perceptions of its actors, collecting data in realistic settings and generating theory (Brockington & Sullivan, 2003; Denzin & Lincoln, 2008). Qualitative research is significant in exploring issues of process and in explaining how outcomes are achieved or not (Miller, Dingwall & Murphy, 2004). Considering that there is a limited amount of research available on the topic of the influence of neoliberal politics in the SRI in Bangladesh with a deeper understanding of the local context, more research is required to further comprehend this matter. The adopted qualitative research is organised by primary and secondary data. The primary data used in this study is composed by fieldwork, interviews, focus group, participant

observation and fieldwork notes. The secondary data is used to identify gaps in the literature, presenting interesting questions or approaches that can be addressed into practice through primary data (Meth & Williams, 2006).

Qualitative methods work inductively, building up theory from observations, rather than deductively, testing theories by trying to refute their propositions (Brockington & Sullivan, 2003). According to Mortelmans (2007), the objective of an analytical induction is to obtain general theories based on specific cases. The inductive approach is evident in several types of qualitative data analysis, especially grounded theory (Corbin & Strauss, 1990). A grounded theory approach considers theory and the construction of theory based on empirical data as central elements (Mortelmans, 2007). In grounded theory research, coding is the fundamental analytical process used by the researcher and there are three types of coding: open, axial and selective (Corbin & Strauss, 1990). Corbin and Strauss define open coding as an interpretative process by which data are processed analytically, allowing to question and to compare in order to break through subjectivity and bias. In axial coding categories are related to their sub-categories, and in selective coding the categories are unified around a core category (Corbin & Strauss, 1990). In this research, a grounded theory approach is used based on an inductive method, where empirical data is structured through a coding process.

3.1 Field research: the primary data

Field research continues to remain a central element in development research (Scheyvens & Storey, 2003) generating new knowledge and offering insights that may force the creativity of the researcher (Scott, Miller & Lloyd, 2006). The choice in doing fieldwork was made to allow the researcher to explore the subject in study on the ground. According to Scheyvens and Storey (2003), although fieldwork remains the primary means by which researchers place themselves in unfamiliar contexts to explore and seek to understand other perspectives, many of them may experience a culture shock. Another aspect to take into account is that despite of the indispensable preparation for fieldwork, it is not possible to predict the fieldwork environment or the data that will emerge from literature research (Scheyvens & Storey, 2003).

The inclusion criteria of the research are constituted by a selection of interviewees, representative of a wider group of stakeholders directly involved in the SRI in Bangladesh. The stakeholders involved in the SRI in Bangladesh are divided in ten groups. These are the workers in the shipbreaking yards in Bangladesh, the yard owners in Bangladesh, the cash-buyers, the ship owners, national and international NGOs, the GoB, researchers, trade unions, national and international media and the European Union. The sample consists of twenty-one individual interviewees, being part of nine of the ten groups of stakeholders involved in the SRI in Bangladesh. The tenth group corresponds to the workers in the shipbreaking yards in Chittagong, which is composed by thirteen individual interviews, ten participated in a focus group discussion and around twenty were part of a participant observation. Amongst the twenty-one interviewees, six were contacted by e-mail, thirteen by phone, by the researcher of the research assistant, and two were personally contacted. It is important to note that one of the interviewees, Dr. Z.R., the Deputy Secretary of the Chittagong City Corporation, is not directly involved in the SRI. The contact was given by a contact in Dhaka who thought that he was knowledgeable about the issue of the SRI, what was not the case. Though this contact was selected because it permits to know the perspective of someone from Chittagong who is not involved in the industry. This contact has, in its turn, permitted to establish contact with another stakeholder, the Sitakunda's local government Officer, Mr. Z.S. While the aim of interviews is not to gain statistically significant results, it is important to target a diverse range of people who might have different opinions or perceptions based on their own experiences and context (Willis, 2006). When policies are searched to address the localized impact of a globalized industry such as the SRI it is significant to include stakeholders at multiple scales (Mizanur Rahman, Schelly & Mayer, 2018). In view of the more open-ended and subjective content, face-to-face interviewing is normally recommended (Simon, 2006).

The fieldwork was realized in Bangladesh, namely in Chittagong and Dhaka and in Brussels, Belgium. From the 28th August 2018 until the 26th September 2018 and from the 10th until the 14th January 2019, the fieldwork was realized in Bangladesh. In the period between October 2018 and April 2019, interviews occurred in Belgium. The contact with the Director and Founder as well as the Communication and Policy Officer of the NGO-SP in Brussels was the first step to make possible the realization of the fieldwork. The contact with the NGO-SP has permitted to contact with the Project Coordinator of the NGO-SP in Bangladesh and YPSA

member, Mr. M.F., as well as with other stakeholders in Belgium. Mr. M.F. was the research assistant during the fieldwork. He has been an activist for the last ten years and has a considerable knowledge about the SRI in Bangladesh which has allowed him to build an extended network of stakeholders in the SRI in Bangladesh. The assistance of the fieldwork was supported by Mr. J.K. and Mr. J.H. A daily reflection was made with the research assistant and the co-assistants in order to guide the research and achieve the main objective of the research questions. However, it has to be taken into account that local intermediaries, who act as translators and interpreters, have their own status either within the research context or with members of a research community (Brydon, 2006). Their own power relations and views as well as the role of the interpreter and his or her power relationship with the researcher have to be taken into consideration as well (Scott, Miller & Lloyd, 2006). With stakeholders supporting different discourses (Mizanur Rahman, Schelly & Mayer, 2018) and Mr. M.F. being a serious exposed stakeholder, the connection between Mr. M.F. and this research were kept hidden as a result of the exposition this research would face in relation to other stakeholders of the SRI in Bangladesh. This could be considered a negative factor influencing the impartial and transparent position that the researcher should hold (Rigg, 2006).

3.1.1 Interviews

Interviews are considered the main channel of information-gathering or a starting point or background to support other forms of data collection (Willis, 2006). There are some limitations on interviews such as the danger of being subjective, pushing the interview in a desired direction as well as the difficulty in writing during the interviews and the time taken to transcribe the recorded interviews (Brockington & Sullivan, 2003). Interviews can be based on structured questionnaires, semi-structured discussions or unstructured interviews (Brockington & Sullivan, 2003). In this study, structured, semi-structured and unstructured interviews were considered the most suitable method to use as interviews are an excellent way in gaining credible information and examining processes, motivations and reasons for successes or failures (Willis, 2006).

The interviews were organized in semi-structured interviews, which follow a form of interview schedule that ensure that the important areas to the researcher are covered, giving

space to the interviewees to develop their responses, ideas and thoughts (Willis, 2006). However, a more structured approach to interviews is recommended because of time limitations and restrictions over the presence of the research in certain locations (Scott, Miller & Lloyd, 2006). Structured interviews ensure that the important areas are covered, providing the interviewees with opportunities to bring up their own ideas and thoughts (Willis, 2006). Unstructured interviews were chosen due to unexpected interviews or because of the intention of the researcher in letting the interviewee to speak freely about the subject (Simon, 2006). The selection of the interviewees was done by the researcher according to the available contacts of the stakeholders provided by the researcher assistant. Step by step, the network grew and there were more potential contacts. Some stakeholders such as the ship recyclers and members of the Mol in Bangladesh were interviewed in the final part of the fieldwork once the exposition of the researcher would be greater as this could have influenced the course of the research. In the beginning of each interview, the interviewees were informed about the academic purpose of this thesis and all of them gave automatically consent to be part of the research. However, due to their great exposition because of their role in the SRI in Bangladesh, the researcher has made the decision to preserve their anonymity in this thesis and the initials of their names were changed.

The interviews were initially realized in Bangladesh, Chittagong, from the 4th until the 24th September 2018 and from the 10th until the 14th January 2019. In Dhaka, the interviews happened between the 25th and the 28th September 2018. The stakeholders were identified and contacted, and a daily planning was organised. The interviews were established, and based on the literature, reviewed before and during the fieldwork. The semi-structured interviews were organized according to general topics about the context of the SRI in Bangladesh, and the unstructured interviews served to acquire knowledge in the dynamics that occur in the context of the case-study. All the interviews are archived in appendices and are based on the fieldwork notes. The research questions were adjusted throughout the fieldwork after analysing the first results and remained as open and adaptable as possible. This allowed the researcher to ensure space and opportunity to go deeper into answers and obtain more information about the issue. The interviews in Bangladesh were conducted in English and Bangla. On advice from the research assistant, these were not recorded because of the fact that recording interviews was seen as an inhibited factor to the information

received from the interviewees as well as the presentation of an informed consent in respect to anonymity. The interviews were translated in English by the co-assistants and were summarized and written up with notes. The interviews in Belgium were recorded and transcribed. According to Willis (2006), direct recording allows the researcher to focus solely on the interview without having to concern about taking notes or remembering points to write up later. Another advantage is that direct recording gives the opportunity to verify the meaning of words and phrases that may have been missed during the interview (Willis, 2006).

3.1.2 The stakeholders of the SRI in Bangladesh

The stakeholders directly involved in the SRI in Bangladesh, and who were interviewed during the fieldwork, are briefly presented and described below.

Ship owners: ship owners sell their ships to be dismantled (NGO-SP, 2017). The EC estimates that 40% of vessels make their final trip to a scrapping destination under the flags of states that are exceptionally weak at enforcing internationally agreed rules such as the Comoros, Palau, St Kitts and Nevis, and Tuvalu (Daems, 2019).

Bangladesh Ship Breakers and Recyclers Association: the Bangladesh Ship Breakers and Recyclers Association (BSBRA) is composed by the yard owners, also called ship recyclers, who are the owners of a ship recycling yard, re-rolling and rolling mills industries, and who possess a yard to operate ship recycling activities within the acknowledged ship recycling zone (Ahammad & Sujauddin, 2017; Mol, 2011).

Workers: the workers of the shipbreaking yards are categorized into supervisors (supervisor of the work of around fifteen to twenty general workers), foremen (supervisor of the work of three to four supervisors or fifty to sixty workers), cutters, fitters, wire experts and their helpers (Ahammad & Sujauddin, 2017). According to a SRI survey, the casual and temporary workers are engaged through a contractor and each work shift usually runs for eight hours with about one hour of break (Ahammad & Sujauddin, 2017). The worker's wages are reported between 200 taka (helper, cutterman helper, etc.) and 500 taka (cutterman, foreman, etc.) per shift (per day) (Ahammad & Sujauddin, 2017). Official data of the average wage in Chittagong was not found.

Cash buyers: the cash buyers are the commercial facilitators, specialized in trading end-of-life ships, who establish the connection between the ship owners and the ship recyclers (Mikelis, 2018). They constitute an integral part of the SRI providing indispensable services to the ship owner, namely expertise in a specialized market and reduction to the shipowner's risk in this process (Mikelis, 2018). The cash buyers purchase ships for cash and sell them, usually at a profit, to the ship recycler, who normally pays to the cash buyer with a Bank Letter of Credit (Mikelis, 2018). About 95% of all ships sold for recycling are sold by cash-buyers (Ahammad & Sujauddin, 2017).

NGO: NGOs, involved in the issue of the SRI, are significantly present in Bangladesh (Ahammad & Sujauddin, 2017; Sarraf et al., 2010).

- NGO-SP, founded in 2005, is a coalition of environmental, human- and labour rights organizations which globally promotes safe and environmentally sound ship recycling (NGO-SP, 2017). The local members of the NGO-SP interviewed in Chittagong are Young Power in Social Action (YPSA) and Bangladesh Institute of Labour Studies (BILS) (NGO-SP, 2017).
- YPSA, founded in 1985, is a non-governmental Bangladeshi social development organization, which cooperates with vulnerable population to bring them and their society sustainable development (Greenpeace, FIDH & YPSA, 2005). In the shipbreaking context, YPSA is focused on the improvement of working conditions at Chittagong shipbreaking yards and does advocacy for a policy to ensure human rights in the SRI (NGO-SP, 2017).
- BILS, founded in 1995, is the only labour institute in Bangladesh that facilitates the links between trade unions and other civil society organizations (NGO-SP, 2017). It has the support and active participation of the Major National Trade Union Federations (NGO-SP, 2017).
- IndustriALL is an international NGO who leads a campaign to eliminate shipbreaking, considered as one of the most dangerous jobs in the world (IndustriALL, 2016).

Trade unions: according to the Bangladeshi Labour Laws 2006 the Department of Labour is responsible to control that the right of the workers to organize in trade unions is ensured (Sarraf et al., 2010).

Bangladesh Ship Recycling Board (BSRB): the BSRB is established in 2011 by the GoB, under the Mol, to provide one stop service for the SRI in association with other Government Departments (Mol, 2011). These agencies are responsible for supervising the SRI in Bangladesh ensuring workplace safety and the application of labour and environmental laws to achieve a suitable environmentally ship recycling activity (Ahammad & Sujauddin, 2017).

Government of the People's Republic of Bangladesh: as it is previously described in the BSRB, there are different agencies of the GoB who officially supervise the SRI in the country according to the SRR of the Mol approved in 2011 (Mol, 2011). A project, called International Maritime Organisation (IMO)-NORAD SENSREC-Project, has been developed in Bangladesh by the Mol. The Mol works together with the recycling industry, the IMO and the Secretariat of the Basel Convention (BC⁵) under a Norwegian funded project for the creation of hazardous waste management facilities and for the development of training courses for ship recycling workers and managers (Mikelis, 2018). The following information is based on the SRR of the Mol (2011) and in the recent economic (Ahammad & Sujauddin, 2017) and environmental (Shahadat Hossain, Sharifuzzaman & Chowdhury, 2016) reports of the IMO-NORAD SENSREC-Project. If it is not the case, the sources are mentioned.

- Ministry of Shipping: a permit for the ship to enter territorial waters for beaching is finally issued by the Chittagong Port Authority (Galley, 2014).

⁵ The Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal was adopted in 1989 and came into force in 1992 (UNEP, 2014). The BC is considered the most comprehensive global environmental agreement on hazardous wastes and other wastes and it aims to protect human health and the environment against the adverse effects resulting from the generation, transboundary movements and management of hazardous wastes and other wastes (UNEP, 2014).

- The Mol administers the compliance with the SRR and issues Non-Objection Certificates (NOC)⁶. As a signatory of the International Labour Organisation and the IMO, Bangladesh is supposed to follow the international regulations in compliance to NOC for importing ships, inspection beaching and cutting permissions. For the various stages of the approval process by the Mol, other entities of the GoB are involved in this process, described as follows.
- The Ministry of Environment and Forests is responsible for controlling the following procedures related with the SRI:
 - No Objection Certificate: Inspectors have the authority to visit and inspect ships before beaching and to visit/inspect shipbreaking yards to ensure environmental compliance (Sarraf et al., 2010).
 - Ship Recycling Plan: *“includes the yard for ship recycling as per approved lay out equipped with various facilities as prescribed by Ship Building and Ship Recycling Board”* (Mol, 2011, p.3).
 - Inventory of Hazardous Materials will be enforced after government’s ratification of the Hong Kong Convention⁷ (HKC).
 - Ship Recycling Facilities Certification will be enforced after government’s ratification of the HKC.
- The Department of Environment is responsible for the enforcement of the environmental legislation (Belal, Cooper & Khan, 2013). This department examines the

⁶ A Non-Objection Certificate is a legal certificate issued by an agency that approves the procedure of the intended operation (Mol, 2011). The NOC is mandatory to import the particular ship for scrapping in Bangladesh (Sarraf et al., 2010).

⁷ The HKC is an international convention on a set of rules and regulations for the safe and environmentally sound recycling of ships, adopted in Hong Kong in May 2009 aiming to ensure that the act of shipbreaking or recycling does not cause any unnecessary risks to human health or to the environment (Jain, Pruyne & Hopman, 2013). Therefore, the Convention sets out the regulations concerning the design, construction, operation and maintenance of ships to control the installation and treatment of hazardous materials on ships (Jain, Pruyne & Hopman, 2013). According to the authors, the HKC has developed international awareness to improve the standards of ship recycling.

ship for hazardous and toxic waste and is authorized to issue an Environment Clearance Certificate.

- The Department of Explosives is responsible for issuing the certificates for 'Gas free for man entry'⁸ and 'Gas free for hot work'⁹, which means that the ship can be cut by torches.
- The Ministry of Labour and Employment has the following departments:
 - The Department of Labour is responsible for controlling the working conditions and workers' health and welfare (Sarraf et al., 2010).
 - The Department of Inspection for Factories and Establishment (DIFE) are responsible for the control of the registration of the yards, the monitoring of occupational safety and health status and the compliance of registration requirements.
 - Ship Recycling Facilities Certification will be enforced after government's ratification of the HKC.

Researchers: researchers are part of the BSRB encouraging collaboration with different universities, research institutes and international organizations to exchange knowledge and expertise (Ahammad & Sujauddin, 2017).

Local and international media: the SRI has been exposed by Bangladeshi newspapers and by international media (Mizanur Rahman, Schelly & Mayer, 2018). Nowadays, the SRI is still an issue that is being reported on the Bangladeshi newspapers, as proven in the recent press

⁸ 'Gas-free for men entry' means that, in the designated space compartment, the oxygen content of the atmosphere is adequate, toxic materials in the atmosphere are within permissible concentrations and the residues cannot produce toxic materials under existing atmospheric conditions.

⁹ 'Gas free for hot work' means that, in the designated space compartment, the oxygen content of the atmosphere is adequate, except for inert spaces or where external hot work is to be performed. The concentration of flammable materials in the atmosphere is below a determined permitted level and the residues cannot produce a higher concentration under existing atmospheric conditions in the presence of fire as well as all adjacent spaces containing flammable or combustible materials have been cleaned sufficiently to prevent the spread of fire.

releases ‘2 burnt dead at ship-breaking yard’ from Prothom Alo and ‘What plagues our ship-breaking industry?’ from DhakaTribune (Prothom Alo, 2019; Sejan, 2019). In the international media, the SRI in Bangladesh is reported in The Guardian with the report ‘This is the world’s cheapest place to scrap ships-but in Chittagong, it’s people who pay the price’ and in Recycling International with the news report ‘Ship owners not quite saying goodbye to beaching’ (Linnenkoper, 2019; Vidal, 2017).

Below this paragraph, an overview is presented of the interviewed stakeholders. Listed in table one in a chronological order by the day, the location of the interviews and how data were collected.

Table 1. Overview of the interviewed stakeholders

| Stakeholder | Who? | Where? | When and how? |
|--|---|--|--|
| Bangladeshi district government | Dr. Z.R.- Deputy Secretary of Chittagong City Corporation | Chittagong City Corporation, Bangladesh | September 3, 2018 from 4 p.m. until 5 p.m. Semi-structured interview documented with notes |
| Researcher | Dr. N.Z.- Associate Professor of Law at Chittagong University and Advocate at the Supreme Court of Bangladesh | At the lobby of a Private Hospital in Chittagong, Bangladesh | September 4, 2018 from 5 p.m. until 7 p.m. Semi-structured interview documented with notes |
| National and international NGO | Mr. A.S.- Coordinator BILS’s information and training centre and | BILS’s information and training centre in Chittagong, Bangladesh | September 5, 2018 from 12:00 p.m. until 1:30 p.m. Interviewed together with Mr. NU. in the |

| | | | |
|------------------------------|--|--|--|
| | Representative of the NGO-IndustriALL | | presence of one of the co-research assistants Semi-structured interview documented with notes |
| National NGO | Mr. A.T. – Chairman of the BILS | BILS’s information and training centre in Chittagong, Bangladesh | September 5, 2018 from 12:00 noon until 1:30 p.m. Interviewed together with Mr. A. S. in the presence of one of the co-research assistants Semi-structured interview documented with notes |
| Trade Union | Mr. A.N.- President of District Committee of Bangladesh Trade Union Centre | At the lobby of a hotel in Chittagong, Bangladesh | September 6, 2018 from 6 p.m. to 8 p.m. Semi-structured interview documented with notes |
| Researcher | Dr. N.T.- Professor at Chittagong University Marine Sciences and Fisheries Institute | Restaurant Pitstop in Chittagong, Bangladesh | September 6, 2018 from 7 p.m. until 9 p.m. Semi-structured interview documented with notes |
| Activist on the field | Mr. K.M. | YPSA’s office in Chittagong, Bangladesh | September 7, 2018 from 2 p.m. until 3 p.m. in the presence of one of the co-research assistants |

| | | | |
|-------------------------------------|---|--|--|
| | | | Semi-structured interview documented with notes |
| Bangladeshi local government | Inspectors of the DIFE: Mr. A.A. and Mr. A.B. | DIFE's office in Chittagong, Bangladesh | September 10, 2018 from 9:30 a.m. until 10:30 a.m. in the presence of one of the co-research assistants Semi-structured interview documented with notes |
| Bangladeshi local government | Mr. Z.S.- Sitakunda's local government Officer | Local government's office of Sitakunda Chittagong, Bangladesh | September 11, 2018 from 10 a.m. until 11:15 a.m. Semi-structured interview documented with notes |
| Bangladeshi local government | Mr. R.S.- Assistant Commissioner and Executive Magistrate in Sitakunda's local government | Local government's office in Sitakunda, Chittagong, Bangladesh | September 11, 2018 from 11:30 a.m. until 12:30 p.m. Unstructured interview documented with notes |
| Yard owners | Mr. J.K. ¹⁰ - President of the BSBRA | BSBRA's office in Chittagong, Bangladesh | September 16, 2018 from 11 a.m. until 1:30 p.m. Unstructured interview documented with notes |

¹⁰ Vice Chairman City General Insurance Co.; Director BD Finance Securities Limited (brokerage house); and Director of Bangladesh Finance & Investment Co. (lease financing).

| | | | |
|--|---|---|---|
| Local and international media | Mr. V.S. -President of Chittagong Union of Journalists, Chittagong Correspondent of Thomson Reuters and Chittagong's Special Correspondent of <i>Bangladesh Post</i> | Mr. V.S.'s office in Chittagong, Bangladesh | September 18, 2018 from 5:30 p.m. until 6:30 p.m. Semi-structured interview documented with notes |
| Workers of the shipbreaking yards in Bangladesh | Thirteen workers | Worker's houses in a village near the shipbreaking yards in Sitakunda | September 21, 2018 from 11 a.m. until 2 p.m. in the presence of both co-research assistants Structured interviews documented with notes |
| National and international NGO | Mr. M.F.- Project Coordinator of NGO-SP in Bangladesh and YPSA member | YPSA's office in Chittagong, Bangladesh | September 23, 2018 from 2 p.m. until 4 p.m. Semi-structured interview documented with notes |
| Bangladeshi national government | Mr. R.M.- Deputy Secretary of the Mol | Mol's office in Dhaka, Bangladesh | September 25, 2018 from 10:30 a.m. until 12:30 p.m. Unstructured interview documented with notes |
| Researcher | Dr. N.D.- Doctor of Juridical Science, | Dr. N.D.'s office in Dhaka, Bangladesh | September 25, 2018 from 4 p.m. until 6 p.m. |

| | | | |
|--------------------------|---|--------------------------------------|--|
| | specialized in International maritime law. The domain of research of his PhD was the ratification of the HKC in Bangladesh and India. | | Semi-structured interview documented with notes |
| International NGO | Mrs. J.R.- Director and Founder of NGO-SP Mr. N.R. - Communication and Policy Officer of NGO-SP | NGO-SP's office in Brussels, Belgium | October 24, 2018 from 11 a.m. until 1 p.m. Semi-structured and recorded interview |
| Cash Buyer | Mr. C.E.- Former-head of the IMO's ship recycling section of the HKC on the Safe and Environmentally Sound Ship Recycling. Nowadays Mr. C.E. is a non-executive director of the cash-buyer Global Market Systems (GMS). | In Bruges, Belgium by skype | November 22, 2018 from 12:00 noon until 1 p.m. Semi-structured and recorded interview |
| Ship owners | Mrs. D.W.- Director for Maritime Safety | In Bruges, Belgium by skype | April 12, 2019 from 12:00 noon until 1 p.m. |

| | | | |
|-----------------------|--|-----------------------------|---|
| | and Environment of the European Community Shipowners' Association (ECSA) | | Semi-structured and recorded interview |
| European Union | Mr. L.M.- Policy Advisor for the Green Group of the EC | In Bruges, Belgium by phone | April 21, 2019 from 2 p.m. until 2:30 p.m. Semi-structured and recorded interview |

3.1.3 Focus group

A focus group is defined as a discussion in a group about a particular issue where the objective is to learn from the way people discuss things and from the interpretation of the group dynamics (Brockington & Sullivan, 2003). As stated by Lloyd-Evans (2006), focus groups are commonly used to determine information on collective views of social issues as well as to understand collective social action, accessing group beliefs, understandings, behaviours and attitudes that might be overlooked in in-depth interviews. One of the limitations is that groups induce misguided notions of collective or community consensus (Lloyd-Evans, 2006). During the fieldwork in Chittagong, the possibility of a focus group discussion with the workers of the shipbreaking yards in Sitakunda has appeared. Mr. J.K., one of the co-assistants of the research, and the researcher have met a group of ten workers. Out of all the participants only two workers spoke basic English. Therefore, the conversations were translated by the co-research assistant from Bangla to English. The main focus of the group's discussion was on the daily experiences of the workers in the SRI in Chittagong according to some general questions. This is considered important to the argument of the thesis since it can provide insights about the impact of the SRI corresponding to the social impact of the industry in Chittagong. Below a table with an overview of the focus group.

Table 2. Overview of the focus group

| Stakeholder | Who? | Where? | When and how? |
|-------------|------|--------|---------------|
|-------------|------|--------|---------------|

| | | | |
|---|------------------------|-------------------------------|--|
| Workers of different shipbreaking yards in Sitakunda | A group of ten workers | At YPSA's office in Sitakunda | September 21, 2018 from 2 p.m. until 4 p.m., 2018 in the presence of the co-research assistants. Documented with notes |
|---|------------------------|-------------------------------|--|

3.1.4 Participant observation

Participation observation requires to the researcher an emersion in the place or societies being studied (Brockington & Sullivan, 2003). According to Brockington and Sullivan, the researcher is permitted to empathize with the subject's way of looking at and interpreting their world. The authors report some limitations of this method however, as the context can be sometimes hard and unpleasant to experience. In this way it requires effort and determination to understand the language and what people mean (Brockington & Sullivan, 2003). In this research, participant observation was applied on four occasions.

The first occasion was presented on the 11th September 2018 when during an interview to the Sitakunda's local government Officer, Mr. Z.S., an opportunity was provided to visit a shipbreaking yard on the day when a ship was coming from abroad. The members of the local government of Sitakunda are invited by the yard owners in these occasions. This has permitted to establish the contact with other group of stakeholders, the yard owners.

The second occasion was during a meeting at the YPSA's local office with the NGO - Business and Human Rights Association (BHRA) on the 14th September 2018. BHRA established contact with YPSA and visited the shipbreaking area for the first time. Around twenty workers were present along with the members of YPSA and of BHBA. The aim of this meeting was to share the problems the workers are daily facing in order to understand what BHBA could mean to help alleviate their difficulties, that in partnership with YPSA.

The third occasion was a visit to a fishing community near a shipbreaking yard in Sitakunda with the co-assistant Mr. J.K. As a reference person of YPSA in that village, Mr. J.K. permitted to let the villagers be investigated about the actual situation in the context of this research. The communication was made in Bangla and translated in English.

The fourth and last occasion was a visit to the shipbreaking yards in Sitakunda. This opportunity appeared during the last part of the fieldwork in September 2018, namely during the interview with Mr. R.M. of the Mol in Dhaka. While not essential to answer the research questions, there was the possibility that this observation could enrich the fieldwork since it allowed for the opportunity to observe the space where the industry takes place and to get directly into contact with other yard owners in Bangladesh. Having access to the yards is generally known as a difficult process as it requires some bureaucratic documents such as an authorization letter from the Mol of the GoB. After the thesis' Supervisor had written a letter¹¹ to the Mol asking permission for the researcher to visit the shipbreaking yards in Sitakunda, the permission letter¹² was approved. Below a table with an overview of the participant observations.

Table 3. Overview of the participant observations

| Stakeholder | Who? | Where? | When? And How? |
|----------------------|--|--|---|
| Yard owners | Two generations of yard owners | Shipbreaking yard in Sitakunda, Chittagong, Bangladesh | September 11, 2018 from 2:30 p.m. until 5 p.m. |
| NGO + Workers | A group of about twenty workers, YPSA and BHRA members | YPSA's office in Sitakunda | September 14, 2018 from 2 p.m. until 4 p.m. in the presence of both co-research and research assistants |

¹¹ See [appendix 25](#).

¹² See [appendix 26](#).

| | | | |
|---|--|--|--|
| | | | |
| Fishing community surrounding a shipbreaking yard in Sitakunda | People living in a fishing community | Village U.S. in Chittagong, Bangladesh | September 20, 2018 from 2 p.m. until 4 p.m. in the presence of one the co-research assistants. |
| Yard owners | Contact person: Secretary of the BSBRA's President | 2 shipbreaking yards in Sitakunda | From the 10 th to the 13 th January 2019 |

3.1.5 Fieldwork notes

Fieldwork notes are a daily record of events, work or observations kept by the researcher (Brockington & Sullivan, 2003). Notes and interpretations taken during the field research are re-created as a working interpretative document (Denzin & Lincoln, 2008). Fieldwork notes were taken during the interviews, the focus group discussion and participant observations. The notes were complemented with any significant observations made concerning interviewee's behaviour and surroundings.

3.1.6 Photography

When undertaking fieldwork, many researchers take photographs of people and places as part of a primary data collection method (Harrison, 2006). As reported by Harrison, photography is a method used to show the research area and to support the written account of research findings. It can be used as a means to emphasize theoretical points about meaning and representation in a cultural and historical manifestation only available through visual means (Emmison, 2004). Nonetheless, as stated by Barker (2006), photography needs to be done sensitively and modestly, and may encounter a hostile reaction from local people if it is intrusive or undertaken without the consent of those being photographed. The taking of photography was possible during the fieldwork and approved by the people who appear in the pictures. Photography proves to be useful to provide evidence of the current situation of the SRI in Bangladesh. The pictures taken during the fieldwork are in the appendix 24.

3.2 Literature review: the secondary data

Literature review constitutes the secondary data of the qualitative method for this research. According to Meth and Williams (2006), literature review encourages the critical and analytical skills of the researcher as it allows to identify key subjects and offering constructive criticism of existing work. In order to theoretically contextualize the research questions, relevant literature was searched and structured thematically according to the context of the SRI in Bangladesh as well to literature of neoliberalism, political context in Bangladesh and HD. The literature review includes books, scientific articles from Google Scholar, Springer and Research Gate, official documents related to the SRI, master's thesis and dissertations as well as reports and press releases. The literature reviewed was created between 1989 and 2019.

3.3 Validity and reliability

The quality of a research is related to the generalizability of the findings and thereby to the testing and increasing the validity or reliability of the research (Golafshani, 2003). These concepts are mostly supported by quantitative researchers and those methods are not entirely applicable to qualitative research (Bashir, Afzal & Azeem, 2008). However, according to Bashir, Afzal and Azeem, both qualitative and quantitative researchers need credibility of their research. With or without specific references made to quality criteria such as validity, reliability and generalizability in the reporting or publication of qualitative research, a researcher who is looking for rigour or quality in their work considers the need for the implementation of the necessary research strategies or practices (Ali & Yusof, 2011).

A central dimension of validity involves construct validity which involves the correspondence between theoretical concepts and the observations that are supposed to represent those concepts (Peräkylä, 2004). Validity determines whether the research accurately measures that which it was intended to measure or how truthful the research results are (Golafshani, 2003). Validity can be considered as external and internal (Mortelmans, 2007). External validity means the generalization of the results to the population which the study refers to (Mortelmans, 2007). Internal validity refers to creditability. On its turn, reliability is the consistency and replicability, which means that an instrument should have the same results when used again (Mortelmans, 2007). The key aspects of reliability involve selection of what is recorded, the technical quality of recordings and the adequacy of transcripts (Peräkylä,

2004). According to Peräkylä, qualitative research involves assuring the accuracy of its recordings and testing the truthfulness of analytical claims.

The authors Ali and Yusof (2011) present a set of research strategies to implement in order to establish rigour in qualitative research. These are measured with respect to the following aspects:

- The used qualitative method is adequate to answer the research question
- There is more than one qualitative method used
- The group of interviewees is described
- The words of the interviewees may be read or presented in quotes
- The way the interviews were conducted is given as well as interview schedules
- A description of the way the data is converted into theory is given
- Long fieldwork is argued to develop rapport with respondents
- A revisit to interviewees is usually made to clarify meanings, being contacted to confirm Interpretations and meanings
- An existing theory is supported or refuted by the findings
- There is agreement between constructs and interpretations and the meanings held by interviewees are provided

Source: (Ali & Yusof, 2011).

Considering and reflecting about the validity and reliability of this study and based on the criteria published by Ali and Yusof (2011), this study respects the following conditions: the used qualitative methods (through interviews, a focus group discussion, participant observations and fieldwork notes) have permitted to answer the research question. In the chapter methodology the interviewees are described and in the chapter analysis their meanings and quotes are presented as well as the interviews in appendices. The methodology applied to integrate data in theory is described as well as the theory arguments which are complemented with the findings of the study. The duration of the fieldwork was sufficient to interview all group of stakeholders involved in the SRI in Bangladesh, however more time of fieldwork would have permitted to interview a broader number of stakeholders which would bring more insights to the study and improve its reliability. A revisit to the interviewees was

not possible to realize due to the difficulty in contact all the interviewees by e-mail, what reduces the degree of validity of the data collected.

4. Analysis

This chapter describes the most relevant findings of the empirical data collected from the conducted interviews as well as from the focus group and participant observations. The findings of the fieldwork will be presented following the sub-research questions which provide answers to the main question: in which way have neoliberal politics influenced the SRI in Bangladesh since its emergence until now? The sub-research questions are aimed to investigate who the dominant stakeholders are in the SRI in Bangladesh as well as of what kind of impact the industry causes. The following questions analyse how the dominant stakeholders in the SRI in Bangladesh influence the impact of the industry and what is the role of the national context in the SRI in Bangladesh. The last sub-research question aims to examine in which way the dominant stakeholders have a significant role in the achievement of HD in the SRI in Bangladesh. The answer to the main question leads to the argument of this thesis that neoliberal politics integrated into the Bangladeshi politics, through a business-driven policy, have influenced patterns of HD in the SRI in Bangladesh, in which the dominant stakeholders have a significant role.

4.1 The dominant stakeholders in the SRI in Bangladesh

The sub-research question which aims to investigate the dominant stakeholders in the SRI in Bangladesh is linked to the argument of this thesis through the rise of the dominant classes in neoliberalism analysed in sub-chapter 2.2.3 of the theoretical framework. To research who the dominant stakeholders are in the SRI in Bangladesh and considering the significant role of dominant classes in neoliberal politics, this sub-research question focuses on the relevance of the stakeholders involved in the SRI.

This study found, among the twenty-one interviews realized, that in ten of the interviews the dominant stakeholders are mentioned as being the yard owners, the GoB, the cash-buyers, the ship owners and the EC. From the ten interviewees, seven of them consider the yard owners the dominant stakeholder in the SRI in Bangladesh, with specific reference to the

BSBRA by one interviewee and to the PHP (Peace, Happiness and Prosperity) yard by two of the interviewees. This can be verified by the following statements and paragraphs:

“The BSBRA is a strong organization with a huge financial power and influence which makes it difficult to the government to implement such measures”, Inspectors of the DIFE (Mr. A.A. & Mr. A.B, personal communication, September 10, 2018).

“The ship recyclers in Bangladesh are very influential and the most powerful stakeholders in regard to economic power”, Representative of the journalists in Chittagong and correspondent of Reuters and the Bangladesh Post (Mr. V.S., personal communication, September 18, 2018).

“The BSBRA is the most dominant stakeholder. Workers and environmental activists are the least dominant”, a Bangladeshi lawyer and researcher specialized in international maritime law (Dr. N.D., personal communication, September 25, 2018).

Such as the previous stakeholders, the Policy Advisor for the Green Group of the EC (Mr. L.M., personal communication, April 21, 2019) considers the yard owners the most dominant stakeholder. However, he is very clearly referring to the PHP yard amongst the yard owners. Mr. L.M. highlights the influence of the PHP yard in Bangladesh combined with the influence of Mr. C.E., a cash buyer and the former head of the IMO’s ship recycling section, to the unsustainability of the SRI. The Assistant Commissioner and Executive Magistrate of the Sitakunda’s local government (Mr. R.S., personal communication, September 11, 2018) emphasizes the significance of the PHP yard as well. He declares that PHP is the first and the only yard with the ‘green certificate’¹³ in Bangladesh, which can be considered as an incentive towards competition between the yards and contribute to the improvement of the shipbreaking activities. The Project Coordinator of the NGO-SP in Bangladesh and YPSA member (Mr. M.F., personal communication, September 23, 2018) mentioned the PHP yard as the only shipbreaking yard which has the HKC Certificate. For him, this requires investment

¹³ A green ship recycling certificate is obtained by a country when the HKC is ratified (Mr. N.R., personal communication, October 24, 2019).

and the PHP yard is the only one who has the financial capacity to improve the shipbreaking conditions. For the Deputy Secretary of the MoI (Mr. R.M., personal communication, September 25, 2019), Bangladesh has a long way to go until the ratification of the HKC. He supports that the willingness of the yard owners is very important and working with them to ratify the HKC is crucial. Contrarily, an Associate Professor of Law at Chittagong University (Dr. N.Z. personal communication, September 4, 2018) considers the GoB the most powerful stakeholder. He states:

“The government (of Bangladesh) is the main actor in the shipbreaking industry because the government makes the law and provides licenses to the yards. The government can struggle their business in the way that it is responsible to regulate the industry. It is without doubt the most powerful stakeholder”.

Despite of the influence of the yard owners referred to by the previous interviewees, a cash-buyer (Mr. C.E., personal communication, November 22, 2018) emphasizes that the yard owners are the most powerful as well as the weakest. According to him the strength in dominance of the stakeholders in the SRI in Bangladesh comes from being able to dictate the standards of the SRI. On the one hand, Mr. C.E. states that along the time the ship owners have looked for an economic advantage, permitting their ships to be dismantled in Bangladesh without the concern of the national and international community. On the other hand, Mr. C.E. mentions that the yard owners in Bangladesh are weak since they are exposed to all the costs and uncertainties of the market. Contrarily to the last interviewees, the Director for Maritime Safety and Environment of the ECSA (Mrs. D.W., personal communication, April 12, 2019) considers the EC the dominant stakeholder on the political level, since the EC would be capable to encourage the improvement of the SRI's conditions in Bangladesh.

On one side, the economic power and influence of the yard owners as well as their significance on the sustainability and unsustainability of the SRI in Bangladesh are referred by different interviewees who consider the yard owners the most dominant stakeholder in the industry. On the other side, there is the GoB and the ship owners, who are considered the most dominant stakeholder to other interviewees. In case of the GoB, they are responsible to uphold the law while the ship owners obtain economic advantage from the shipbreaking

practices in Bangladesh. The perspective of the Policy Advisor for the Green Group of the EC emphasizes the alliances established between stakeholders, in this case between the PHP yard and Mr. C.E., a representative of the cash-buyers in this research, who are both considered to have a dominant role in the SRI in Bangladesh regarding the industry's current practices. However, while the yard owners are mostly referred to as the dominant stakeholder by seven interviewees, there is also an opposing argument to be made because the yard owners are also considered by one interviewee to be at the mercy of the market. The workers and the environmental activists are also mentioned by one interviewee as the weakest stakeholders. These opposing views create some debate. The findings of this study in this sub-research question are connected to the literature through the role of dominant classes in neoliberalism, a context in which Harvey (2006) emphasizes the ability of neoliberal politics in the restoration of class power of the dominant stakeholders. The findings are further supported by the hypothesis of Navarro (2007) that the dominant stakeholders in neoliberalism are from developed and developing countries alike. The existence of dominant and weaker stakeholders in the SRI in Bangladesh is significant when the impact of the SRI in Bangladesh is analysed. This is further demonstrated in sub-chapter 4.2.

4.2 The impact of the SRI in Bangladesh

The sub-research question about the impact of the SRI in Bangladesh is presented in this sub-chapter. In the table below, a descriptive summary is presented whereby the data is divided by economic, environmental and social impact of the SRI in Bangladesh based on the information obtained through the interviews, focus group and participant observations. This is a starting point to the analysis of the findings in this sub-chapter.

Table 4. Fieldwork data of the impact of the SRI in Bangladesh

| Impact Stakeholders | Economic | Environmental | Social |
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| Deputy Secretary of the Chittagong City Corporation (Dr. Z.R.) | Dr. Z.R. (personal communication, September 3, 2018) highlights the economic significance of the SRI | | As social impact, Dr. Z.R. (personal communication, September 3, 2018) refers to the dangerous nature of |

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| | for Bangladesh. He refers this through the creation of employment opportunities and the production of materials used in construction purposes obtained from iron provided by the SRI. | | the job and that the workers are dying. |
| Associate Professor of Law in Chittagong University (Dr. N.Z.) | | | Dr. N.Z. (personal communication, September 4, 2018) mention the precarious working facilities in the shipbreaking yards with no sufficient equipment, no adequate training to the workers as well as no-existence of an appointment letter. |
| Representatives of NGO-IndustriALL and BILS, respectively (Mr. A.S. and Mr. A.T.) | Mr. A.S. (personal communication, September 5, 2018) mentions that in the SRI there are about 15.000-50.000 workers and about 400.000 people involved in the industry in Bangladesh. Mr. A.T. (personal communication, September 5, 2018) complements stating that the SRI supports a large number of other industries and provides raw material with 50% of iron. | | Mr. A.S. (personal communication, September 5, 2018) states that the workers suffer from the indifference of the yard owners, who not give the workers technical training. |

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| <p>President of the District Committee of Bangladesh Trade union Centre (Mr. A.N.)</p> | <p>Mr. A.N. (personal communication, September 6, 2018) says that there are about 25.000 workers in the shipbreaking yards and about 50.000 people indirectly involved in the industry.</p> | | <p>Mr. A.N. (personal communication, September 6, 2018) states that the workers do not have working facilities according to the law, facing problems related to occupational and health safety. He adds that about 18 workers died in 2017. There are cases where the workers lose their job without any notice from the yard owners. Mr. A.N. refers child labour as a social impact as well.</p> |
| <p>Professor at Chittagong University Marine Sciences and Fisheries Institute (Dr. N.T.)</p> | <p>Dr. N.T. (personal communication, September 6, 2018) accentuates the significant source of iron provided by the SRI in Bangladesh.</p> | <p>Dr. N.T. (personal communication, September 6, 2018) states that the SRI contributes to achieve environmental security and green recycling. According to him, the environmental impact of the SRI is not an isolated phenomenon in Chittagong.</p> | <p>As social impact, Dr. N.T. (personal communication, September 6, 2018) mentions the working conditions with insufficient equipment, and the absence of an appointment letter.</p> |
| <p>Activist on the field (Mr. K.M.)</p> | | | <p>Mr. K.M. (personal communication, September 7, 2018) visits the shipbreaking yards every week and he has contact with the workers. He confirms that the workers in the SRI are from a very poor class and they receive low salaries. Mr.</p> |

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| | | | K.M. (personal communication, September 7, 2018) accentuates that they have neither job security or nor rights. He says that the workers do not even have a working contract nor any work training at the shipbreaking yards. |
| Inspectors of the DIFE (Mr. A.A. and Mr. A.B.) | The Inspectors of the DIFE (personal communication, September 10, 2018) refer to the SRI in Bangladesh as a provider of a huge source of income. As economic impact, they mention that the workers receive in average 8000 taka a month, what they consider low wages. They add that the GoB has published a minimum wage of 16.000 taka a month though it is not yet implemented. | | As social impact, the inspectors of the DIFE (personal communication, September 10, 2018) tell that in the 2000s the yard owners just drop the death bodies into the ocean without any visibility. They mention that on the first quarter of 2018 there were each month about three to four accidents reported. For the inspectors of the DIFE (personal communication, September 10, 2018), the workers are highly exposed to dangerous working conditions. |
| Sitakunda's local government Officer (Mr. Z.S.) | Mr. Z.S. (personal communication, September 11, 2018) mentions as economic impact of the SRI in Bangladesh the large number of people who are engaged with the | | |

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| | <p>industry through the created employment opportunities. He adds that this fact creates opportunities to families to purchase economic power.</p> <p>Mr. Z.S. (personal communication, September 5, 2018) refers that with the existence of the SRI in Bangladesh there is not necessary to import iron or steel.</p> | | |
| <p>President of the BSBRA- Representative of the yard owners of the SRI in Bangladesh (Mr. J.K.)</p> | <p>Mr. J.K. (personal communication, September 16, 2018) refers that thousands of people are indirectly engaged with the SRI. He states that the industry provides a source of 80% of steel material in Bangladesh, which is reusable in different ways.</p> <p>Mr. J.K. (personal communication, September 16, 2018) emphasizes that the yard owners pay government duties and taxes.</p> | | <p>Mr. J.K. (personal communication, September 16, 2018) refers to the accidents in the shipbreaking yards saying that they are decreasing because the yard owners provide personal protective equipment (PPE) to their workers. He adds that <i>“it is a mandatory rule since the last ten years.”</i></p> |
| <p>Representative of national and international media (Mr. V.S.)</p> | | | <p>Mr. V.S. (personal communication, September 18, 2018) refers to the lack of</p> |

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| | | | working safety as social impact of the SRI as well as the non-existence of an appointment letter or working contract. |
| Project Coordinator of the NGO-SP in Bangladesh and an YPSA's member (Mr. M. F.) | | Mr. M.F. (personal communication, September 23, 2018) refers to the environmental contamination in Chittagong, which, according to him, is responsible to the decrease of fish diversity as well as damaging to the fishermen, who have <i>"to go into the deep sea if they want to get good fish"</i> . | Similar to the activist on the field interviewed, Mr. M.F. (personal communication, September 23, 2018) mentions that the workers of the SRI in Bangladesh come from the poorest part of the country. He emphasizes the fact that they do not receive a compensation when they lose their job or get injured. Mr. M.F. (personal communication, September 23, 2018) refers to child labour as a social impact as well. Related to the environmental impact of the SRI in Bangladesh, Mr. M.F. (personal communication, September 23, 2018) states that the food chain is also affected once men eat fish affected by sea pollution. |
| Deputy Secretary of the MoI of the GoB (Mr. R.M.) | Mr. R.M. (personal communication, September 25) refers the economic importance of the SRI in | | Mr. R.M. (personal communication, September 25) emphasizes as social impact the lack of |

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| | Bangladesh as a provider of 60-70% of iron for the Bangladeshi demand. | | workers' awareness in the use of PPE. |
| NGO-SP members (Mrs. J.R. and Mr. N.R.) | The members of the NGO-SP (personal communication, October 24, 2018) mention the collection of taxes by the GoB as an economic impact of the SRI to the country. They mention that the SRI contributes with 40% of the national source of steel, used for construction purposes. | As environmental impact, Mrs. J.R. and Mr. N.R. (personal communication, October 24, 2018) accentuate the pollution in the Chittagong coastal region with the cost of toxic hotspots. | Mrs. J.R. and Mr. N.R. (personal communication, October 24, 2018) signal as the social human impact of the SRI the child labour, workers' deaths and health problems as well as the social damage to the fishing communities in the surrounding areas of the shipbreaking yards. |
| Cash-buyer and the former-head of the IMO's ship recycling section (Mr. C.E.) | | About the environmental impact of the SRI in Bangladesh, Mr. C.E. (personal communication, November 22, 2018) states that <i>"the environmental costs are what you make of it"</i> . | As social impact, Mr. C.E. (personal communication, November 22, 2018) emphasizes the fact that the workers do not have an identity card. |
| Representative of the European ship owners - ECSA (Mrs. D.W.) | According to Mrs. D.W. (personal communication, April 12, 2019), the economy of Bangladesh is deeply dependent on steel provided by the SRI. | | Mrs. D.W. (personal communication, April 12, 2019) states that, in the 2000s, the world had to admit that sustainable practices were not present in Southern Asian countries, where the SRI takes place. |

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| <p>Participant observation (Meeting with the NGOs - YPSA and BHBA- and twenty workers of the SRI)</p> | <p>During the participant observation (September 14, 2018), the workers consider that the SRI in Bangladesh is a provider of employment and a source of income for “a lot of people”. Because of this reason, the workers do not want the SRI in Bangladesh to stop.</p> | | <p>During the participant observation (September 14, 2018), the social impact of the SRI in Bangladesh is described as the non-existence of a written agreement letter, no fixed salary as well as the lack of hospital facilities and a correct emergency support¹⁴ in case of accident in the shipbreaking yards. During the meeting, the members of the present NGOs sustained that in the shipbreaking yards the employers give the job to a male and/or young people preferably without children. A Representative of the NGO-BHBA believe it is a sector of the population vulnerable to exploit and generally they are people without schooling.</p> |
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¹⁴ In case of accident, the workers tell that there is often no ambulance. They do not get the correct emergency support when needed and, in their opinion, it could save lives. They are often transported to the hospital in a CNG, but the yard owners are supposed to give appropriate emergency transport to the workers (Participation observation with the NGOs, BHBA and YPSA, and the workers, September 14, 2018). On a press release, published on February 18, 2019 by *The Daily Star*, after a fire accident during the scrapping of the ship *Greek Warrior*, two workers were burned (Yousuf, 2019a). In the same press release is published that one worker was discovered on board, and the other was transported, in the middle of the chaotic Chittagong`s traffic, to the Chittagong Medical College Hospital (approximately 39km from Sitakunda), dying before reaching the hospital (Yousuf, 2019a).

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| <p>Participant observation in a fishing community in Sitakunda</p> | | <p>During the visit to the fishing community (September 20, 2018) near a shipbreaking yard, which was constructed seven years ago, a fisherman of sixty-five years old, who works for the last fifty-five years as fisherman, states <i>“go inside the forest and you can see with your own eyes, it is oil damaging the forest”</i>. He highlights saying that <i>“cows die because of the damaged products they find and eat in the forest”</i>.</p> | <p>During the visit to the fishing community (September 20, 2018) the fisherman admits that he had a <i>“golden life”</i> and now he says that it has changed compared to the time before the shipbreaking yard was constructed near the village.</p> |
| <p>Findings from interviews of thirteen workers of the shipbreaking yards in Chittagong</p> | <p>From the thirteen interviews of the workers (September 21, 2018) it is possible to conclude that their salary is, on average, about 3500-7000 Taka for about twenty-two to twenty-six working days, which are the days they usually work. Some workers refer that it is not possible to work thirty days in a row because of the weight of the job.</p> | | <p>During the interviews with the thirteen workers (September 21, 2018) child labour as well as heavy working conditions in the shipbreaking yards in Bangladesh are referred to by the workers. They point to the lack of safety conditions especially in the night shift, which is considered illegal, but it still exists. Despite of that, they admit that working at night is better because they do not have to work during the warm day temperatures. As healthy problems, the workers refer back and thoracic</p> |

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| | | | pain. In one interview is mentioned the absence of a written and legal contract. |
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Ships are scrapped and have a huge economic value at the end of their life, so as stated by Mikelis (2018). When ship owners, through cash-buyers, send their ships to be dismantled in Bangladesh, ships are considered waste. However, waste is transformed in commodity with a huge economic value in Bangladesh. This clarifies the starting point to understand the economic significance of the SRI in Bangladesh as well as the findings presented on table 4. However, despite of the referred significant economic impact of the industry in Bangladesh, the impact of the SRI on environmental and social levels in the country is surfaced as a common topic. These results are consistent with data obtained in other recent studies such as the economic report of Ahammad and Sujauddin (2017) or the report of Mikelis (2018), the studies focused on the environmental and social impact of the SRI in Bangladesh by Sarraf et al. (2010), Galley (2014), EC (2016), ILPI (2016), Shahadat Hossain, Sharifuzzaman & Chowdhury (2016), Saiful Karim (2018), NGO-SP (2017) or Daems (2019). In this manner, the results of this study verify the hypothesis, reported by Navarro (2007), that neoliberalism have permitted the enormous potential of capitalism as an efficient mechanism for economic development. However, and according to the environmental and the social impact of the SRI in Bangladesh, with interviewees focusing more on the latter, the economic development of the industry has not been accompanied by social progress, creating debate about patterns of HD. The findings prove the hypothesis of Bonnano (2017) in the context of the SRI in Bangladesh that the classical free market under neoliberalism does not achieve a form of capitalism that is concerned with the socio-economic equality of the society. As HD is defined by Peet and Hartwick (1999) as a concept which means more than economic growth, it proposes that there is a focus on the conditions of production with emphasis on the environmental and social consequences affected by the economic activity. In this way, patterns of inequality in HD are evidenced in the findings of the fieldwork as patterns of HD in the SRI in Bangladesh are not fulfilled. Moreover, and based on the findings, economic development in the SRI in Bangladesh is being considered an end and not a means to achieve HD, contrasting to the concept of HD sustained by Fukuda-Parr (2013).

In conclusion, the impact of the SRI in Bangladesh on environmental and social levels points to the creation of contradictions within the neoliberal proposals of development through economic growth, referred as well to by Peck and Tickell (2007). The environmental and social impact of the SRI further supports the idea of Demaria (2010) of an ecological distribution conflict in a neoliberal political context. This means that despite of the positive economic impact of the industry to Bangladesh, the social and environmental consequences suggest an unequal distribution of the benefits and burdens of the SRI accompanied by an uneven distribution of welfare. In chapters 4.3 and 4.4, the results will lead to an understanding of why these inequalities happen since the emergence of the SRI in Bangladesh in the 1980s until now.

4.3 The role of dominant stakeholders in the impact of the SRI in Bangladesh

In the previous sub-chapters, the findings reveal the dominant stakeholders in the SRI in Bangladesh as well as the impact of the industry. This leads to a reflection about in which way the dominant stakeholders influence the impact of the SRI in Bangladesh. The findings in this sub-chapter, which provide answers to the sub-research question, demonstrate the significant influence of neoliberal politics on the impact of the SRI in Bangladesh and the significant role the dominant stakeholders play in such a political context. The influence of neoliberal politics in the SRI in Bangladesh is presented in this sub-chapter and divided in two parts, the role of externalization of costs and the role of political influence in the SRI in Bangladesh.

4.3.1 Externalization of costs

The externalization of costs in the SRI in Bangladesh is referred to by three interviewees. A Bangladeshi lawyer and researcher specialized in international maritime law (Dr. N.D., personal communication, September 25, 2018) was asked in which way the impact of the SRI could be related to neoliberal politics. He said that cost externalization exists under the reign of capitalism. The same view has the Policy Advisor of the Green Group for the EC (Mr. L.M., personal communication, April 21, 2019), who considers that the beaching method in the SRI means promoting the lowest costs, which are beneficial to the business of ship owners and cash-buyers. Mr. L.M. declares that this is a cruel situation for the poorest countries, which

having the lowest standards, pay the highest prices. He describes this situation as a complete externalization of the costs. The Director and Founder of the NGO-SP (Mrs. J.R., personal communication, October 24, 2018) mentions the ship owners as well saying that the SRI in Bangladesh still causes a huge range of impacts with ship companies still sending their ships to Bangladesh through cash buyers. On the side of the ship owners, represented by Mrs. D.W. (personal communication, April 12, 2019) the SRI is not a business case in Europe and the demand for steel in Europe is less than in Southern Asian countries where the SRI takes place, Bangladesh, India and Pakistan. Mrs. D.W. considers that all of these factors play a role in the entire drive of the market of the SRI.

According to the findings, the externalization of costs in the SRI in Bangladesh is enforced by an interesting aspect, which come out of four from the twenty-one interviews, the ineffectiveness of the international law in regulating the SRI in developing countries. This situation creates a debate among the stakeholders. According to a Professor at Chittagong University Marine Sciences and Fisheries Institute, (Dr. N.T., personal communication, September 6, 2018), it is crucial to know about which standards in the SRI are being considered. Dr. N.T. mentions that this is a subjective point and explains further by stating that the international law generates huge controversy:

“it is important to set up the standards in the shipbreaking issue. Even between the BC and the HKC are some conflicts by which are not able to solve the problem of non – uniformity in the shipbreaking issue”.

In the perspective of the representative of the cash-buyers in this study, Mr. C.E. (personal communication, November 22, 2018), the BC is a political instrument as it deals with the export of waste, though not how to do it, which is not applicable for ships because of this reason the BC causes legal problems. The Policy Advisor for the Green Group, Mr. L.M. (personal communication, November 22, 2018) says that the European Union tried to implement the Basel Ban for a long time, which forbids the transport of waste from OECD to non-OECD countries, but he admits it failed, mentioning the need for a new approach. According to the Deputy Secretary of the MoI, Mr. R.M. (personal communication, September 25, 2018), so as the BC and the HKC, the European Ship Recycling Regulation (ESRR) is not uniformized. He mentions the double standard of the ESRR, on one side beaching is not

allowed and on the other side the ships can change the flag legally. The representative of the European ship owners, Mrs. D.W. (personal communication, April 12, 2019) mentions that 'beaching' is not defined, continuing that the HKC and the ESRR deliberately do not mention the technology used to dismantle a ship. She adds that beaching can perfectly happen in sustainable and unsustainable conditions. Contrary, the interviewees of the NGO-SP (Mrs. J.R. & Mr. N.R., personal communication, October 24, 2018) have a different view about this topic, saying that beaching in Bangladesh is done in the intertidal muddy land which represents the most unsustainable practices according to environmental standards. This difference of perspectives creates a debate between the stakeholders involved in the SRI in Bangladesh.

According to the findings, the environmental and social impact of the SRI in Bangladesh is in this manner related to cost externalization, as characteristic of neoliberalism (Harvey, 2014; Navarro, 2007; Peck & Tickell, 2007), through which the ship owners and the cash-buyers obtain economic advantages. At the side of the ship owners, Mrs. D.W. mentions that the SRI is not a business case in Europe, adding that Europe does not have such a high demand of steel so as Bangladesh, India and Pakistan. According to her, these are significant elements to understand the market dynamics. These dynamics support the premise of the unrestricted role of the market in neoliberalism, stated by Bonnano (2017), in which the resources are distributed in the most efficient way though with its own failures, which are identifiable in the SRI in Bangladesh as external effects, sustained by Harvey (2014) and Wallerstein (2004). The externalization of the costs clarifies the shift of the SRI from the developed countries to Southern Asian countries, combined with the increased high cost waste management reported by the UNIDO in the developed countries (UNIDO, 2010). The externalization of costs referred to by the interviewees has been enforced by an ineffective international regulation of the SRI, which reveals weaknesses in controlling the export of hazardous wastes from developed to developing countries. In this manner, it can be argued that neoliberal policies have the tendency to externalize the costs outside of its environment and give sovereignty to the market.

4.3.2 Political influence

The role of political influence complements the previous sub-chapter, demonstrating that neoliberal politics have created conditions to the dominant stakeholders in the SRI in

Bangladesh to exert political influence on a national and international levels in order to achieve their own interests.

An article on the Bangladeshi newspaper The Daily Star reported in 2018 that a mangrove forest in Chittagong was rented to a private company to build a shipbreaking yard (Yousuf, 2019b). This happened after the forest department earlier had informed the Deputy Commissioner's office that the forest was under process of being declared a reserve forest. As a result, this procedure violates a Supreme Court directive, the existing laws and the national forest policy (Yousuf, 2019b). If the area is rented to the construction of a shipbreaking yard, it would cause pollution of the nearby forest and damage on the coastal biodiversity, so as published in the same newspaper report. This situation proves that a context of neoliberal politics frequently reveals opportunities for well-connected officials to informally control the market and material rewards so as sustained by Springer (2011). This is the starting point to introduce the role of political influence of one of the dominant stakeholders in the SRI in Bangladesh, mentioned as the yard owners by seven interviewees in sub-chapter 4.1. The cash-buyer interviewed in this study (Mr. C.E., personal communication, November 22, 2018) admits that the yard owners are very wealthy and well-connected people. He adds as well as the Director and Founder of the NGO-SP (Mrs. J.R., personal communication, November 22, 2018) that the yard owners have the capacity to improve the shipbreaking yard conditions. However, Mr. C.E. emphasizes that the human nature always looks to be the number one. He states:

"They (yard owners) are surrounded by very expensive cars, very expensive houses, a lot of servants, without improving their yards. However, if they feel that their business is going to improve, or their business is going to suffer, they put their hand in their pockets and they invest".

Mr. C.E. (personal communication, November 22, 2018) reveals the difference as well between the PHP yard and the other yards in Sitakunda by evidencing the role of political influence of the PHP yard in the SRI in Bangladesh. So as Mr. C.E., Mrs. J.R. (personal communication, October 24, 2018) emphasizes in the following statement the role of the PHP yard and its political influence on international level as well.

“PHP is also very well-connected. They invited the Ambassadors from different European countries to come to visit the yard. Because of that, we criticized the Swedish ambassador at one point. He published in the social media that ‘PHP yard was a great dry-dock’. There is no dry-dock. And never forget that they are breaking European ships, and these European owners allow those standards, which are not good enough, and would never be allowed in Europe”.

According to Mrs. J.R. (personal communication, October 24, 2018), the shipbreaking yards, the re-rolling mills and the construction industries are interlinked. She illustrates this situation by giving the example of the company KSRM, one of the largest construction companies in Bangladesh. Mrs. J.R. adds that PHP and KSRM companies are everywhere in Chittagong. She states:

“...these omnipresent companies, who own the yards as well, have many links in the local parliament. There is a very good documentary of Bangladesh, which is very revealing of the social structure, how the workers are recruited, what they feel when they go home...It shows quite well the power of the yard owners. Even if it is from 2005, it is not that different from now, unfortunately”.

Mrs. J.R. complements with the influence of the cash-buyers in the SRI in Bangladesh referring the connection between them and the yard owners. She expresses her standpoint about this point, saying:

“If you have 150 shipbreaking yards in Bangladesh, 100 in India and 50 in Pakistan, in total there is a market of cash buyers. We can say that, essentially, 10 companies control the market. And the GMS is one of the greatest ones, if not the largest one. It has a big share of the market. They are very closely linked to the beaching yards, as well. A member of the GMS is linked to the brother of someone who owns a yard in India. They are a kind of the extended army of the beaching yards and the ship who ends up in South Asia would have passed through a cash buyer. So, they are closely linked. The cash-buyers register and change the flag, paying the exchanges in cash. This should be questioned”.

Adding evidence to the role of political influence in the SRI in Bangladesh, the President of the Chittagong’s trade union, Mr. A.N. (personal communication, September 9, 2019), states

that the parliament in Bangladesh is constituted by 63% of businessmen, proving the significant role of the business class in the political sphere in Bangladesh. Moreover, and looking into the international level, in response to the question if there is a conflict of interest amongst the IMO in the scope of the HKC, a Bangladeshi lawyer and researcher specialized in international maritime law (Dr. N.D., personal communication, September 25, 2018) believes it is there. Dr. N.D. supports that unless a major overhaul of the HKC is done, not much can be expected. He emphasizes that under the HKC, the principle stakeholder, the ship owners, apparently have no responsibility. He continues that politics is a means of attaining economic power. Dr. N.D. considers that Bangladesh is a “*vivid example*” of this and the SRI is a “*classic example*”. The members of the NGO-SP (Mrs. J.R. & Mr. N.R., personal communication, October 24, 2018) find that the impact of the SRI in Bangladesh is reduced by the two reports¹⁵ made under the IMO-NORAD SENSREC Project in Bangladesh. They consider that the economic significance of the industry in Bangladesh was privileged against the environmental and social impact. Mrs. J.R. and Mr. N.R. have linked this fact to a conflict of interest of the project Coordinator of the first phase of the IMO-NORAD SENSREC-Project, Mr. C.E., a cash-buyer and the former-head of the HKC in the shipbreaking sector, and a stakeholder interviewed in this study as well.

In the findings of this sub-chapter, only three of the stakeholders mentioned as dominant ones are involved in dynamics of political influence in the SRI in Bangladesh. These are the yard owners, the cash-buyers and the ship owners. On a national level, the difference between PHP yard and the other yards is also referred to by two interviewees, who consider that it is determined by the ability of creating influence on national and international levels as well as on economic power. One interviewee reveals the role the construction companies in Chittagong in the SRI as well. On an international level, the conflict of interests is mentioned in the HKC with reference to the ship owners as well as the influence of the cash-buyers in the drive of the market in the SRI. The evidences demonstrate that the political influence of the yard owners in government structures in Bangladesh have been enforced by neoliberal policies. As revealed in the theory, the business class in Bangladesh has obtained, since the rule of military regimes, political influence in order to pursue their own business interests in

¹⁵ Ahammad & Sujauddin, 2017; Shahadat Hossain, Sharifuzzaman & Chowdhury, 2016.

a context of a Bangladeshi state, directed to economic growth through a private sector led development (Hassan & Raihan, 2018). This has been supported in the SRI in Bangladesh due to the massive contribution of the industry to the economy of the country, so as shown in the findings of sub-chapter 4.2. So as stated by Harvey (2005), and evidenced in the findings, neoliberalism liberates individual entrepreneurial freedoms and skills through strong private rights, in which the state creates or preserves frameworks suitable to these practices. The role of the GoB in the impact of the SRI in Bangladesh will be analysed in the following sub-chapter.

4.4 The national context in the SRI in Bangladesh

The findings of this sub-chapter aim to answer in which way the national context in the SRI in Bangladesh allow the impact of the SRI in the country through the analysis of the role of the Bangladeshi state. The answer to this question is revealed by the findings, which evidence the integration of neoliberal politics into the Bangladeshi politics through a business-driven policy. These findings support the argument that neoliberalism does not have a “*one size fits all*” model (Brenner & Theodore, 2002, p.353) and should be integrated on a local scale.

4.4.1 The role of the Bangladeshi state

So as reported in the literature, the SRI in Bangladesh has grown in an exponential way over the last decades, developing into the current major steel trading business (Mizanur Rahman, 2016; Rabbi & Rahman, 2017). Considering that Bangladesh has an absence of iron and steel as a natural resource and that the SRI is a significant source of these natural resources, as demonstrated by the findings in sub-chapter 4.2., it follows that the SRI as a business was able to grow exponentially throughout the decades (Bhuiyan & Hassan, 2018; Mizanur Rahman, 2016). According to the Deputy Secretary of the Mol (Mr. R.M., personal communication, September 25, 2018), since its emergence, the SRI in Bangladesh is a business which only has been formalized as an industry in 2011 in order to allow government intervention. This evidence further supports the idea of a neoliberal pro-free market policy with no state intervention integrated in a business-driven policy, which had been adopted since the period of the military regimes in Bangladesh, namely “the one” of General Ershad. During the meeting between the members of YPSA, BHRA and a group of workers of the shipbreaking

yards, the informality in the shipbreaking sector was a significant issue that has been mentioned. Despite the formal recognition of the SRI as an industry in 2011, the SRI is still not treated as such and the informality therefore remains (participant observation, September 14, 2018). Moreover, as mentioned during the meeting and on findings of chapter 4.2, the fact that the workers do not hold a written agreement letter shows the fact the shipbreaking workers are not being officially recognized and thereby demonstrating the informality of the industry. This supports the hypothesis of Hassan and Raihan (2018) that Bangladesh has been a pro-business state with an informal and decentralized regulatory governance.

The President of the Chittagong's Trade Union Centre (Mr. A.N., personal communication, September 6, 2018) accentuates that about twenty years ago accidents happened daily in the shipbreaking yards in Chittagong. Mr. A.N. states that years ago the employees just dropped the bodies of the workers who died in the shipbreaking yards into the ocean without any concern. Nowadays, Mr. A.N. explains that if an accident or death happens, the process is registered and analysed by the Level Court as well as data are easier recorded and reported. However, he adds that in some cases the yard owners still try to hide the accidents yet the pressure of the NGOs, media and the leaders of the trade unions have made this more difficult than it was before the formalization. Furthermore, the Director and Founder of the NGO-SP (Mrs. J.R., personal communication, October 24, 2018) highlights that when there is an accident the yard owners often attribute the responsibility to the workers. According to her, the yard owners could claim that the workers broke the rules, that they had been working when they should not have been working or that they were drunk. Mrs. J.R. reveals that there are cases involving children where the yard owners deny having employed them because that would have been illegal. She mentions that a lack of responsibility by the yard owners still prevails and admits that the SRI is a very difficult industry to organize because it is forbidden to organize on a sector level. Mr. J.R. adds that the SRI in Bangladesh is just allowed to organize on the yard level, stating that cases happen where the yard owner apply political pressure to reject the creation of a trade union at the yard level. However, the Sitakunda's local government Officer (Mr. Z.S., personal communication, September 11, 2018) states that the accidents in the shipbreaking are decreasing, emphasizing the current role of the GoB trying to alert the yard owners to adopt sustainable measures through official letters.

In the perspective of a cash-buyer, when Mr. C.E. (personal communication, November 22, 2018) compares the SRI in Bangladesh and in India, he states that the GoB is weaker than the government in India. He emphasizes that with the recent project of the IMO in Bangladesh, the IMO-NORAD SENSREC-Project¹⁶ for safe and environmentally sound ship recycling, the greatest success is that the GoB became to understand the international pressure, the ship owners' position, issues that most ministries and government officials in a country as Bangladesh would never be able to grasp. In the specific government's approach on the issue of the SRI, both Mr. C.E. and the Communication and Policy Officer of the NGO-SP (Mr. N.R., personal communication, October 24, 2018) accentuate that the GoB has not enforced the law throughout the years. The Director of the NGO-SP, Mrs. J.R. (personal communication, October 24, 2018), claims that while there are already several broken vessels in the intertidal mud flat, the GoB continues to allow the import of more ships with hazardous materials on board. In her opinion, the GoB should establish the legislation, ensure that the law is respected and demand from the companies to operate in line with that legislation. Yet according to Mr. C.E., the GoB is not strong enough to do it. He continues that change requires *"somebody strong in will and in deciding"*. According to Mr. N.R. (personal communication, October 24, 2018) Bangladesh has a kind of inherent problem of downstream waste management, explaining that there are no facilities in specific areas of the country and probably in all of the country. The Deputy Secretary of the Chittagong's City Corporation (Dr. Z.R., personal communication, September 3, 2018) emphasizes that the internal problem in the SRI in Bangladesh is twofold, the prevention of accidents on the one hand and a limitation to resources on the other. He follows up with the example of Japan and the accident in Fukushima where he considers there was a similar issue of working safety. Dr. Z.R. brings up Fukushima in the context of accident prevention and workers' safety in the SRI in Bangladesh saying that both show a similar neglect. The GoB, from Dr. Z. R.'s perspective, has been weak with respects to a specific policy and priority in the shipbreaking sector. However, there is some difference in opinions about the workers' safety. On the one side, the President of the BSBRA (Mr. J.K., personal communication, September 16, 2018) claims that the yard owners

¹⁶ IMO-NORAD SENSREC Project for Safe and Environmentally Sound Ship Recycling: Project implemented by the IMO and the GoB, represented by the MoI, to improve the development of safe and environmentally sound ship recycling in Chittagong.

try to respect the government's guidelines for environmental and workers' safety. He highlights that the yard owners are investing, trying to improve the working conditions. Mr. J.K. states as well that the use of PPE is part of a mandatory rule for the last ten years, affirming that this should be respected and that the yard owners give training to all shipbreaking workers according to their specific job in the yard. On the other side, other interviewees consider the worker's training insufficient or inexistent. These findings can be verified in the interviews in appendices 1, 2, 3, 4, 6, 7, 11, 13 and 16.

In line with the referred lack of government's intervention in the SRI in Bangladesh, which further reveals a decentralized role of the state, Mr. M.F. (personal communication, September 23, 2018), the Representative of NGO-SP in Bangladesh and YPSA member, believes that the coastal district of Chittagong has a huge potential to allow its community to live from its resources. He believes the problem is that the GoB never took the suitable measures to protect the Chittagong's environment and as a consequence it did not grant the possibility to the people to be dependent on Chittagong's resources and to develop the fishing activities and the region. This statement is corroborated by a Professor at Chittagong University Marine Sciences and Fisheries Institute (Dr. N.T., personal communication, September 6, 2018), who states that the shipbreaking area has increased from the 1970s till 2016 from 8km to 22km. According to him, the problem resides in the implementation of the measures by the GoB. Dr. N.T. adds that the government officials in Bangladesh are aware of the research that has been done on the impact of the SRI and that they are also aware of the measures that should be adopted. Dr. N.Z. (personal communication, September 4, 2018), an Associate Professor of Law at Chittagong University, states that the implementation in Bangladesh does not happen because of a lack of accountability, effectiveness and transparency of the structures of the GoB.

Reinforcing the findings revealed in the previous paragraphs, evidencing the lack of deregulation of the SRI in Bangladesh throughout the decades, the Director and Founder of the NGO-SP (Mrs. J.R., personal communication, October 24, 2018) highlights a specific case questioning why the shipbreaking yards in Chittagong are still operating despite the High Court order of 2009. A press release of the Bangladeshi newspaper The Daily Star, in a sequence on a judgement about a submitted petition in 2009 by the Bangladesh

Environmental Lawyers Association (BELA), a partner-NGO of the NGO-SP, complements the findings of this study and the statement of Mrs. J.R. (The Daily Star, 2016). On April 12, 2016 the press release has published that the day before the Bangladesh High Court issued a contempt rule asking fourteen Government officials and the President of the BSBRA to explain why the Court's judgement of March 2009 has not been implemented. As published in the NGO-SP's website (2016), in 2009 the High Court found that the shipbreaking yards did not have the necessary environmental clearance to operate. As a consequence, the shipbreaking yards were closed for ten months. In the same press release it is published that the political influence of the SRI, amongst them members of the Parliament and other powerful politicians as well as some of the most influential industrialists in the country, managed environmental clearances for their yards. The Chief Executive of the BELA declares:

"This step taken by the High Court fundamentally challenges the apathy of the Government agencies in regulating the shipbreaking sector as well as the strong culture of impunity the owners of shipbreaking yards enjoy due to their political connections. This must end. We cannot accept any more deaths of labourers and someone has to finally take responsibility for the fatal accidents" (NGO-SP, 2016, para.2).

Despite of the deregulation of the SRI in Bangladesh, as evidenced in the findings, according to the Assistant Commissioner and Executive Magistrate of the Sitakunda's local government (Mr. R.S., personal communication, September 11, 2018) private investors have to respect government's rules. When asked about the working conditions in the yards, Mr. R.S. states that the GoB encourages the employers to improve the working conditions, to give training to the workers and to try to eliminate child labour. The Coordinator of BILS's information and training centre and Representative of the NGO-IndustriALL (Mr. A.S., personal communication, September 5, 2018) admits that in comparison to the past the GoB is more aware of the problems the workers are facing. A proof of this fact is the starting of the inspections by the DIFE in the shipbreaking yards since 2015, so as indicated by the Inspectors (personal communication, September 10, 2018). They admit that the situation has improved but the process goes slowly. According to the Sitakunda's local government Officer (Mr. Z.S., personal communication, September 11, 2018), the GoB is *"watching everything"* and is focused on labour and safety issues. He accentuates that the accidents in the shipbreaking

are decreasing, emphasizing the current role of the GoB in trying to alert the yard owners to adopt sustainable measures. This demonstrates a shift in mentality of the GoB in the SRI's policy.

Despite a slight shift in mentality of the GoB the overall findings in this chapter show the evidence of a market-friendly development policy in the SRI in Bangladesh. As in accordance with the assumption of Haque (1999), through privatization, deregulation and liberation, these features support neoliberal globalization where the role of the market overlaps the role of the state. Due to an absence of state intervention in the SRI in Bangladesh by a weak and belated enforcement of the law from 2011, patterns of unevenness have been created supporting the idea of Hall, Massey and Rustin (2013) that neoliberalism has created a climate in which economic interest has been favoured with no regard for its consequences/contradictions. The hypothesis of neoliberalism mentioned by Navarro (2007) that economic development, through the reduction of state intervention and the deregulation of labour and business is capable to promote social well-being, is not verifiable in the context of the SRI in Bangladesh. The findings reveal that neoliberal policies have contributed to the development of a business-driven policy in the SRI in Bangladesh, in which the intervention of the state started only in 2011.

4.5 The role of the dominant stakeholders in the SRI in Bangladesh in patterns of human development

Neoliberal policies have had a significant role in the impact of the SRI in Bangladesh what has been suggested through the findings of the previous sub-chapters. It is relevant to look into the role of the dominant stakeholders in the influence of the evidenced unsustainable practices on environmental and social levels in the SRI in Bangladesh as well as to their influence on a shift to sustainable practices.

In terms of patterns of HD, the evidence is considered in the standpoint of an Associate Professor of Law at Chittagong University (Dr. N.Z., personal communication, September 4, 2018), who considers that the second generation of businessmen can have a significant role towards sustainable practices in the SRI in Bangladesh. He considers that the second

generation of yard owners have a different way of thinking about sustainability in the industry and that this change of mentalities comes from the fact that they are well-educated about social welfare patterns. Dr. N.Z. highlights the fact those men have often studied in universities of western countries, which allows more possibilities of dialogue with the yard owners in order to improve the working conditions in the SRI in Bangladesh. From the side of the GoB, the Assistant Commissioner and Executive Magistrate of the Sitakunda's local government (Mr. R.S., personal communication, September 11, 2018) has a positive perspective towards the future of the SRI. He believes that the PHP yard, being the first and only yard with a 'green certificate' in Bangladesh, is the only one who can incentivize the competition between the yards. According to Mr. R.S., the yard owners are forced to compete with each other while trying to comply with environmental and labour safety standards. The interviews in appendices 2, 7, 9, 10 and 14 demonstrate the positive perspective of the stakeholders about the achievement of sustainable practices in the SRI in Bangladesh with reference of two of the interviewees to the significance of factor time. During a participant observation (January 12, 2019), the son of a yard owner, who works for one year at that time with his father and has studied abroad, mentioned that they want to implement the necessary measures towards sustainable practices, continuing that a German consultant would come to help them in that process. He added that PHP is doing a great job, expressing their enthusiasm about their conditions and seeing them as an example to follow. In agreement with the Director and Founder of the NGO-SP (Mrs. J.R., personal communication, October 24, 2018) the PHP yard has better conditions than the others. However, she adds that it is important to reflect about with which standards the PHP yard in Bangladesh is compared. Mrs. J.R. believes that there is still a long way to go to be able to claim that the PHP yard operates safely and in an environmentally sound way. According to Mr. C.E. (personal communication, November 22, 2018), a representative of the cash-buyers in this study, believes the yards owners will invest when they are forced to by the circumstances or by the GoB or when ship owners will stop coming.

Four interviewees from the twenty-one mention the influence of international standards to the sustainability of the SRI in Bangladesh. A Bangladeshi lawyer specialized in international maritime law (Dr. N.D., personal communication, September 25, 2018) states that the HKC can hardly produce any domestic law regarding sustainability. He states, as well as the

Director and Founder of the NGO-SP, Mrs. J.R. (personal communication, October 24, 2018), that the HKC is too pro-business. Mrs. J.R. states that the flag States, like Panama, Liberia, Marshal Islands, have power not because these countries have many ship owners, but because they are attractive flag states to European and Japanese owners due to tax advantages. Despite of this situation, a cash-buyer and the former-head of the HKC in the ship recycling section (Mr. C.E., personal communication, November 22, 2018) supports that ship owners really will be motivated by the HKC. He believes that the ship owners can play an important role in the sustainability of the SRI in Bangladesh, providing support to the upgrading of the shipbreaking yards. The representative of the European ship owners (Mrs. D.W., personal communication, April 12, 2018) believes that a cooperation between the EC and the GoB would be significant, similar to what is already happening in India. According to her, the EC could help Bangladesh to upgrade the industry through the improvement of a stricter law.

The findings of this sub-chapter demonstrate that the dominant stakeholders have not only a significant role in the impact of the SRI in Bangladesh but towards the achievement of patterns of HD as well. Among the five dominant stakeholders referred to by all the interviewees, only the yard owners, the ship owners, the EC and the GoB are referred in the findings of this sub-chapter. The cash-buyers are not mentioned. The interviewees consider that the PHP yard owners and the second generation of businessmen in the SRI have a crucial role towards HD. The role of the HKC to the sustainability of the industry is mentioned as well. There are two different perspectives out from of the interviews. On the one hand the HKC is considered to be capable to guide the SRI in Bangladesh to sustainability. The other side believes that the conflict of interests in the HKC will not motivate the sustainability of the industry in Bangladesh because of its pro-business character. The significant role of the dominant stakeholders in the achievement of patterns of HD means that they are capable to focus not only on the importance of the economic activity but also in complying with environmental and social standards. As neoliberalism is, on the one hand, claimed to improve livelihoods of people through its principles, on the other side, neoliberalism's limitations and contradictions in the SRI in Bangladesh in improving people's lives show an urgent need to shift mentalities, in order to improve patterns of HD in the SRI.

5. Conclusion

In this thesis, an answer is searched to the question: in which way have neoliberal politics influenced the SRI in Bangladesh? The conclusion of the findings is presented and divided by sub-research questions.

The first sub-research question permits the identification, through the interviews, of the yard owners, the GoB, the cash-buyers, the ship owners and the EC as the dominant stakeholders in the SRI in Bangladesh. The yard owners, namely the PHP yard, are considered the dominant stakeholder by most of the interviewees. The other dominant stakeholders such as the GoB, the cash-buyers, the ship owners and the EC are considered by the interviewees to have a significative role in both unsustainable and sustainable practices in the SRI in Bangladesh.

The second sub-research question aims to investigate what the impact of the SRI in Bangladesh is. The impact caused by the SRI in Bangladesh is referred to by the interviews as economic, environmental and social. The economic impact of the SRI in Bangladesh is the employment opportunities, the re-use of steel which is an absent natural resource in Bangladesh and the collection of taxes by the GoB. Despite of the economic impact, the impact on environmental and social levels are mentioned as well. As environmental impacts, the interviewees refer to the pollution in the Chittagong region, the decrease of the biodiversity in the region and its influence on the Chittagong's sustainability in providing resources to the local population. The social impact is referred to by the interviewees as the precarious working conditions of the workers as well as the existence of child labour.

The third sub-research question explores the role of dominant stakeholders on the impact of the SRI. Neoliberal politics, through cost externalization, enforced by political influence on national and international levels, have created conditions to the dominant stakeholders to create the impact of the SRI in Bangladesh.

The fourth sub-research question examines how the national context exerts influence on the SRI in Bangladesh. Since the emergence of the industry until 2011, the findings conclude that an initial absence of a government's industry's policy have contributed to the impact of the

SRI in the country, through a business-driven policy. After the industry was formalized in 2011, the interviews demonstrate that a weak industry's policy and the informality in the industry have been noticeable. Other factors such as lack of accountability, effectiveness, transparency of the structures of the GoB have been brought up in the interviews.

The last sub-research question examines the significant role of the dominant stakeholders in achieving patterns of HD in the SRI in Bangladesh. The findings show that the PHP yard might have a crucial role in promoting competition between yard owners in Bangladesh, which would promote the improvement of the shipbreaking yards. Towards the sustainability of the industry in Bangladesh, the stakeholders point to the significance of national and international cooperation between the dominant stakeholders as well as the pressure from the GoB to the yard owners to revert the current unsustainable patterns of HD in the SRI in Bangladesh.

6. Discussion

This chapter contains the discussion of the findings in order to analyse the conclusions of the study as well as its limitations and implications for further research.

In this study, the findings evidence that neoliberal politics integrated into the Bangladeshi politics, through a business-driven policy, have influenced the impact of the SRI in Bangladesh revealing patterns of inequality in HD, in which the dominant stakeholders have a significant role. Despite of the ideology that neoliberalism does not need the intervention of the state, the state has had a crucial role in creating conditions to neoliberal politics to evolve. This has happened through the dominant stakeholders, who pursue their own economic interests by exerting political influence at different levels also in the Bangladeshi government structures. The findings demonstrate that the importance of economic development created by the industry in Bangladesh has not been capable to fulfil patterns of HD in environmental and social levels. Neoliberal politics in the SRI in Bangladesh are recognisable in the externalization of costs, in which ship owners, cash-buyers, yard owners and the GoB take economic advantages from a deregulated labour and business market in Bangladesh. Along with a market deregulation in Bangladesh, the existence of a worker's class active within a vulnerable social and environmental context have contributed to the economic advantage of

the dominant stakeholders. The weaknesses in regulating the SRI globally, through international conventions and regulations, has a significant role in enforcing and facilitating the externalization of costs. Neoliberal policies have permitted the dominant stakeholders to search an endless capital accumulation, as is characteristic of neoliberalism as well, through the enforcement of political influence on national and international levels. These features have created an unequal distribution of the generated economic development in the SRI in Bangladesh. In this way, this study shows that global neoliberal politics should be integrated in the local context as the local political features are significant to determine its influence on the case in study. The integration in the local context supports the argument of this thesis that global neoliberal politics and its integration into the Bangladeshi politics, through a business-driven policy, have influenced patterns of HD in the SRI in Bangladesh, in which the dominant stakeholders have a significant role in the caused impact as well as in reverting the same impact towards a sustainable industry.

The results of this study may have implications for further research since it motivates the further understanding of the emergence of the SRI in Bangladesh and the persistence of unsustainable shipbreaking practices over the years. This study shows that the challenges in the SRI in Bangladesh in achieving patterns of HD are considered the expansion of people's substantive freedoms, considered by Sen (1999) in terms of civil rights, well-being and human agency, what could have implications on policymaking. Since the impact of the SRI in Bangladesh is explained through a political perspective with emphasis on development patterns, theoretical insights could be encouraged. Understanding the subject of the SRI in Bangladesh from such a standpoint would bring possibilities to improve the status quo. Some interesting topics came out of the findings of the study, where further research would be required. A more in-depth study in the role of international conventions on the SRI in Bangladesh as well as the topic of corporate social responsibility would be interesting topics for further research towards a sustainable SRI in Bangladesh.

The findings of this study have to be considered according to some limitations. The first limitation is related to the methods of data collection through interviews, the usage of focus group and participant observations. Semi-structured interviews were chosen as it could enrich the data collection with interesting topics within the context of the main subject that

came out of the interviews. The questions were modified while conducting the fieldwork according to topics observed during the interviews. As a result, the semi-structured interviews of this study could have been more structured in order to avoid the deviation of the main points of the research question. The fact the interviews were not recorded in Bangladesh can be considered a limitation of this study as well since the data collected could be more precise. In future research, the control of the output of information transcribed during the interviews could be done with the interviewees by e-mail. Due to the lack of time and the difficulties in communication with the interviewees, this was not accomplished. In the focus group, one limitation that should be mentioned is that, among the ten workers who participated, some participate more actively than others what could have influenced the data collected. The participant observations have enriched this study with the data collected. However, in the two participant observations during a visit to the shipbreaking yards there are some limitations to consider. The fact the co-research assistants could not be present, due to a difference of discourse between stakeholders in the SRI, can be considered a limitation once the English was not always fluent spoken. Another limitation within the participant observation of January 2019 is the difficulty faced by the researcher in contacting the involved persons to organise the visit to the shipbreaking yards. This fact has limited the possibility to interview one of the yard owners who are referred as one of the most significant dominant stakeholders in the SRI in Bangladesh, the PHP yard.

The second limitation concerns to the factor time during which the field research in Bangladesh took place. The fieldwork was composed by thirty-five days, which can be considered acceptable in the way it has permitted to interview the representative groups of stakeholders involved in the SRI in Bangladesh. However, the possibility to contact more stakeholders within the groups of stakeholders involved in the SRI in Bangladesh would have required more time, what would have been beneficial to conduct this research, creating opportunities to obtain more insights into the topic in study and more data to generalize the findings.

Lastly, the third limitation to this study is in terms of the personal skills of the researcher and the experiences in the context where the field research occurred. The personal nature, the experience and knowledge of the researcher may be considered to be factors which may have

had an impact on the quality of the findings. The subjective information of the interviewees, taken during the data collection, is considered as significant as the fact that the researcher is exposed to his own human experiences and observations with its respective conclusions. In the context of the research, cultural bias can be considered as a limitation as well in terms of the knowledge of the English language, which made the communication difficult. Despite of the translation from Bangla to English, it is important to notice that the language is a barrier and may influence the translated information. Another significant aspect to note is that English was not the native language, for neither the researcher, the co-research assistants nor the interviewees.

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Appendices

Appendix 1: interview with Dr. Z.R.

The interview with Dr. Z.R., the Deputy Secretary of Chattogram City Corporation, occurred on September 3, 2019 from 4pm until 5pm at the Chittagong' s City Corporation.

What is your work in this division?

Mr. Z.R.: I work in Chittagong City Corporation, a local government entity, as a Chief Revenue Officer. My job consists in mobilizing resources to raise money to the city through revenue collection. My department is a part of the central government of the Ministry of Public Administration.

How do you see the evolution of this industry in Bangladesh?

Mr. Z.R.: About the shipbreaking industry I think there are negative and positive sides. I will find more positive than negative ones. As a positive aspect from the shipbreaking industry, I consider the employment opportunities it creates. The negative side is an internal problem since there is no prevention of accidents.

What is your personal opinion about the working conditions in Bangladesh since there is a negative image of this industry from outside? How do you think things could improve?

Mr. Z.R.: The workers die because of their job. The limitation of resources and capacity of Bangladesh it is a huge problem. The industry itself is not bad. The SRI makes possible the production of materials which are used, for example, in the construction sector. There are industries where a different kind of materials are used and produced from the shipbreaking. About the environmental pollution, there are also chemical industries which contribute to the same environmental degradation. For example, in Japan there was also the issue of working safety, when we think about the accident in Fukushima. But, of course, the economy and political structure of Japan and Bangladesh are pretty different. The GoB, from my perspective, does not have a specific policy and the shipbreaking sector has no priority in government's policy. You can read the government export policy of 2018. The government try to attract national and foreign investors.

Appendix 2: interview with Dr. N.Z.

The interview with Dr. N.Z., an Associate Professor of Law at Chittagong University and an Advocate at the Supreme Court of Bangladesh, occurred on September 4, 2019 from 5pm until 7pm at the lobby of a private hospital in Chittagong.

What kind of research do you do?

Mr. N.Z.: I am participating in projects about child labour as well as on the specific issue of labour law and livelihood of the workers. My background as a researcher is in the issue of livelihood standards of the workers from dry-fish communities and the shrimp aquacultures. The partnership with YPSA, and with the NGO-SP have started through the contact with J.R. in respect to the start of a project. My connection with the SRI has arisen with the legal and social impacts of the industry on worker's health and safety.

What do you think about the second generation of businessmen in the SRI in Bangladesh?

Mr. N.Z.: About the yard owners, I think this second generation of businessmen have a different way of thinking. There is a change of mentalities because they are well-educated about social welfare concepts. These men often have studied in the universities of western countries. In this way, there are more possibilities to talk with them in the way to improve working conditions.

What about the PHP yard? What are the main differences between the other shipbreaking yards?

Mr. N.Z.: They try to give a positive image to the international media, though they try to pretend to improve the negative situation of shipbreaking. We can be sceptical. However, we have to believe they do something good. In the past it was more difficult to contact the yard owners since they had security tracks and sometimes people, who tried to get closer, were threatened.

What do you think about the role of dominant stakeholders in the SRI?

Mr. N.Z.: The GoB is the main actor in the SRI because they make the law and provide licenses to the yards. The GoB can distort their business in the way that is responsible to regulate the industry. It is without doubt the most powerful stakeholder. When we talk about the social

and politic context of Bangladesh, the lack of accountability, effectiveness and transparency of the structures of the government are much present. There is not a political culture and no respect for another's rights. This fact exists in comparison with the western political structure.

What do you mean about it?

Mr. N.Z.: In developing countries, the mentality is very important. In general, people have a lack of general civic sense and social pattern (mind, culture, land profitable without law - breaking the law is not a problem). For example, the workers are not aware of the risks they take. Most of the times when they get PPE, they do not use it. There is a huge problem of lack of workers' training. The employers have the responsibility to train their workers. It is regulated by the GoB. The workers must get training in an official institute which is capable to give them theory and practice courses. They should be instructed and practice on the ground, operating with the machines they use on their daily work activities. This is a safety regulation. BSBRA is the association of the employers and it is supported by the GoB. They tried to start that process of training, but it did not work. Moreover, CSR is a very actual and trendy aspect in Bangladesh, nowadays. It incorporates the structure, the European and the United Nation's frameworks, the global standards and it directs to the responsibility of the employers.

This could lead to a reflection about the sustainability of the industry?

Mr. N.Z.: About the social and economic impacts of the SRI...

Appendix 3: interview with Mr. A.S. and Mr. A.T.

The interview with Mr. A.S. and Mr. A.T. occurred on September 5, 2018 from 12pm until 1:30pm at BILS's information and training centre in Chittagong. Mr. A.S. is the Coordinator of the BILS Information and Training Centre and the Representative of the NGO-IndustriALL. Mr. A.T. is the Chairman of the BILS.

What is your work in the NGO? And how is IndustriALL involved with the issue of shipbreaking?

Mr. A.S.: IndustriALL is an international NGO whose activity has initiated in 2009-2010. The first project of IndustriALL in the shipbreaking ("the motor program") was started in 2009. It was a three-years program focused on social safety and labour rights. We try to organize the workers and make them aware of their own safety. There is no support of the GoB. We have an office in Sitakunda near the shipbreaking yards, where we can support the workers on the field. They are provided with theoretical training rights, learning how they can keep themselves safe.

How do you see the role of the GoB and the role of the yard owners in the way the shipbreaking happens?

Mr. A.S.: In 2010 the GoB tried to start a vocational training program but without success. The workers are victims and the yard owners are a "Mexican mafia" in the way that they do not care about their workers. One of the goals of the NGO is unifying the workers. This situation is changing and developing. Moreover, and regarding to PPE, it is on the rise. In comparison to the past, the government is more aware of the problems the workers are facing and, nowadays, the data are easier recorded and reported. For example, night work is legally prohibited however it still happens in the yards.

How do you think the SRI influence the social dynamics in Chittagong?

Mr. A.S.: The workers come from the Northern and Southern parts of the country. They come from rural areas, from agriculture to industry without receiving any training. This is the social background of the workers. When an accident happens and the workers do not get any compensation from the employers, protests happen on the streets. In 2018 there were two protests: in January and June. These protests are organized by the SBWTUF (Shipbreaking

Workers Trade Union Forum) and they include activists from the trade unions, journalists and civil society. This causes a huge pressure, also from the media, which helps to raise the workers' voice and to solve the problems they are facing.

What is your work in the BILS? And how is BILS involved with the issue of the SRI?

Mr. A.T.: I am the Secretary of BILS, and I work for the SBWTUF as well. BILS is a member of the National Federation, a political organization. There are about 159 yards in Bangladesh. India is the biggest industry in terms of quantity, but Bangladesh is the biggest on number of ships cut. This fact happens because of the natural conditions of the beach in Bangladesh which are more propitious to dismantling the ships. In the shipbreaking, the high season is the dry season after the rainy period. The numbers of workers vary according to the season and it is situated between 15.000 – 50.000 people. People who are involved in the shipbreaking business are about 400.000 people. Until now it is the yard which decides the wage of the workers.

What about the economic significance of the SRI in Bangladesh?

Mr. A.T.: This industry supports a lot of other industries. It provides raw materials, like 50% of materials from iron.

How do you see the evolution and sustainability of the SRI in Bangladesh? What are the main challenges to the future?

Mr. A.S.: I think the partnership between IndustriALL and BILS are very important in the way they secure the protection of workers' rights. The government has declared a minimum wage structure, about 16.000 a month. It has been legally declared and approved but its implementation has been in process. This measure shows a progress in the attitude from the GoB. The lack of collecting data and corruption in the government are important factors when we look into the way shipbreaking activity has evolved.

What do you think about the role of the NGOs and Trade Unions?

Mr. A.S.: Due to the efforts of NGOs and Trade Unions, our workers are much more aware of workplace safety and Trade Union's rights. In some yards, workers are receiving some PPE, legal compensation in case of accident of injury. But still thousands of workers have to be

unionized and a stronger network among NGOs and Trade Unions for the greater interest of the workers has to be further developed. Between January and December of 2016 events were organized, where thousands of workers from the shipbreaking yards have participated. It included formation in case of accidents in the shipbreaking yards, day observance, training program on capacity building, round-table discussion, lobby meeting with inspection department, campaign advocacy team meeting, etc.

Appendix 4: interview with Mr. A.N.

The interview with Mr. A.N., the President of the District Committee of Bangladesh Trade Union Centre, occurred on September 6, 2018 from 6pm to 8pm at the lobby of a hotel in Chittagong.

What is your work in the trade union? What are the activities of the organization and its relationship with shipbreaking activities?

Mr. A.N.: I am the President of the District Community of Bangladesh Trade Union Centre and the Vice-President of the Central Committee. I was a trade union activist in the 1970s when I finish my graduation. This trade union works on the tea and shipbreaking sectors. There are about 9 trade unions, however, just 1 or 3 are active. I am also a member of the SBWTUF. This forum has 10 national federations and it was founded by BILS in 2009. The trade unions try to minimize the accidents that happen on the yards, organizing the workers and saving their rights.

Which kind of support do the workers have from the trade union? What do you think it is the social impact of the SRI in Bangladesh?

Mr. A.N.: About 20 years ago accidents happened every day. At that time, the workers had no voice. There were no facilities according to the law. We see a positive change in this fact. About 20 to 10 years ago, the employees just dropped the bodies into the ocean without any concern, though, nowadays this is not possible anymore because of the support of trade unions. Today if an accident or a death happen, the process is registered and analysed by the Level Court. If a compensation has to be delivered to the worker or the family (in case of injury or death), it is the Level Court which gives a judgement. The trade unions guide the worker in this process. The issue of general trade union rights is a new trend in Bangladesh. The trade union is now pretty focused fighting to get the workers' right to have an appointment letter. For example, if a ship comes and the employer needs 300 workers to dismantle the ship in 3 months, after this time, the workers can be unemployed. They try to find a job in another yard. For that they have to contact a contractor. The economic impact is the employment. About 25.000 workers work directly in the shipbreaking activity dealing with hazardous material and about 50.000 workers in an indirectly way. There are a lot of issues like occupational safety and health which should be improved. Previously, the workers came from

the northern part of the country but nowadays they come also from the southern part of Chittagong. Mostly of them have had education below the secondary school. The ages are between 16 to 45-50 years and child labour has been decreasing because of the pressure of the trade unions and the government, who makes pressure to eliminate it. In 2017 there were 18 deaths. The fact that the workers do not have an appointment letter, an identification card and a written contract it is a huge problem. Everything happens in an informal way. The issue of trade union rights is a new trend in Bangladesh. There is also an international trend and scenario, so as in India and Pakistan. The governments try to abolish the appointment letter and defend a contractualisation. Then, they do not have to guarantee a pension. This fact is also happening in the medical sector. The fact they do not have fixed times of work contributes also for the exploitation of the workers and the improving of night shifts, which are legally prohibited. The workers have deadlines to end a job and the more ton they can dismantle, more money they can receive. The GoB approved a minimum wage of 16.000 Taka a month, but It is not yet implemented. The employers do not bother about what happens with the workers and about rules and laws. In the SRR the employers and the GoB are represented, but there is no representation of trade unions. In the government administrations, the parliament has constituted by 63% of businessmen and corruption. In the report of the government we can read that the trade union should be part of this organization. Now, the trade unions try to dialogue with them through lobbying, press and organization of meetings. It is something in process. The trade union is now preparing and analysing the Review of National Regulatory Instrument of SRI so that they can raise their demand. Sometimes, when the workers are injured and do not get any compensation from the employers, the Forum tries to cover some costs at the hospital. However, it is not always possible to guarantee. The BSBRA's hospital, near the yard zone, was built with the aim of supporting the injured shipbreaking workers. Nowadays, it works as a private hospital and the NGOs and trade unions do not have access to the data instead what would happen if the workers would be in a public hospital. There is a report, made by Dr. N.T., with the objective of discussing it on a meeting and probably create suggestions in the Forum. The researchers are very important because they depend on the data, which can be published in newspapers or media. This is a way to aware the civil society. It is a way to make pressure because there are issues which are not according to the law.

What about the use of PPE?

Mr. A.N.: About the use of PPE by the workers...the supply is not enough, or it is from low quality. The Forum together with BILS organize a public meeting, for the second time this year, with the workers, to show safe and secure protected equipment. This initiative tries to improve the awareness of the workers in their own security at work. The Young Trade Union Activist works with a Danish company giving training about level law to the workers, each Friday. It started last year but, at the moment, the training has stopped because of the lack of funding. The measures that the GoB will start from 2019 has registered in a draft because of the pressure of the BILS and the trade unions. With regard to technical training it has to be private and given by the employers. The GoB gives them five years to implement it.

Do you feel some obstacles from the yard owners?

Mr. A.N.: The BSBRA is the association of employers of shipbreaking. They are more willing to hear the trade unions than before. If there is an accident the trade unions communicate with the BSBRA and try to search a solution. The contact to the DIFE should happen, as well, because the accident has to be registered. There has to be a data base. This process happens because of the pressure of the trade unions and the media. Because of that, this kind of process has improved during the last years.

What do you think about the evolution of the role of the Trade Union and the NGOs?

Mr. A.N.: The Forum works with 7 NGOs. The role of the NGOs is focused on the level of solidarity, but they sometimes “blunt” the activity of the trade unions. They are able to make workshops, seminaries and organize the workers in small groups. A revolutionary activity and a capacity to protest should happen with the mobilization of all workers and not dividing them in groups. This is the negative point of the NGOs.

Appendix 5: interview with Dr. N.T.

The interview with Dr. N.T., a Professor at Chittagong University Marine Sciences and Fisheries Institute, occurred on September 6, 2018 from 7pm until 9pm at Pitstop restaurant in Chittagong.

What kind of research do you do? From where does your interest in the SRI come from?

Mr. N.T.: I work at the Chittagong University on the environmental science department for the last 20-25 years. I worked in the IMO Report of 2017 as well, where you can learn about all the impact of pollution in the fishing communities. My students and I have collected samples from the field.

Which kind of difficulties did you find doing your research?

Mr. N.T.: Any fieldwork is difficult. There are always instructions to get the samples and some framework of science which makes it challenging. We have, normally, easy access to the yards to collect the samples for analysis. There is a good relationship with the yard owners. They respect us as professors, and we respect each other's work. We often do not have to show a formal license to have access to the yard. It happens on an informal way. It is a kind of social respect that can be seen in different countries of South Asia. The SRI is needed to dismantle the ships to achieve some environmental security. The process of recycling is necessary, the so called "green recycling". This process can provide a resource of iron to the country. The process of mining, for example, involves a huge waste of energy and resources with a social concern as well. All industries have costly impacts, though, the scenarios are different. I am optimistic about the implementation of a "green recycling" in Bangladesh but I know the factor time is important. We have to wait and give time.

What do you think about the role of the yard owners in the SRI?

Mr. N.T.: All the activity of shipbreaking involves a lot of people's engagement. However, the side of the yard owners has to be considered as well.

Which measures could be implemented to improve the social and environmental conditions in the shipbreaking yards?

Mr. N.T.: Measures related with environmental protection such as treatment of waste, containing and workers sanitation as well as improving the working environment providing safety conditions to the workers. On the environmental issue, the restriction of the area of the shipbreaking should be limited in a sense of a better control of the impact. From the 1970s upon now there is a huge increasing of the shipbreaking area, from 8km to 22km in 2016. But still, not all yards are active. Some of them become active again but some stay abandoned causing an environmental impact as well. There is an important plan made about these facts – the Maritime Special Planning.

Is it possible to distinguish the origin of the pollution samples taken from the Bay of Bengal?

Mr. N.T.: When we made the research, the collected samples from the ocean could not be differentiated by its origin. Other activities, such as pharmaceutical industry and agriculture, also contribute to the pollution of the Bay of Bengal. The shipbreaking is not an isolated phenomenon.

What about the fishing communities?

Mr. N.T.: About the fishing communities affected by the environmental pollution there is an IMO Report from 2017 where all the important issues are detailed. There exists a UN report as well.

How do you see the evolution of the SRI in Bangladesh? What are the main challenges to the future?

Mr. N.T.: I have an optimistic perspective about all the issue. The problem resides in the implementation of the measures. Still the government officials know the research done about this issue and they know the measures that should be adopted, but the implementation does not happen. The negative impact of shipbreaking is also due to the brutality of the images. The visual impact.

Where do you think is it a lack of research in the issue of shipbreaking? Where research would be needed...

Mr. N.T.: A lot of research has been done about environmental issues, though, less in social and economic issues. A researcher has to be impartial trying to look for solutions. During a

research it is also crucial to know about what standards we are talking about; it is a subjective point. The standards of a determined place in two countries are not the same. Because of that it is important to set up the standards. Even between the Basel Convention and the HKC are some conflicts by which are not able to solve the problem of non – uniformity in the shipbreaking issue. The social impact is related to the working conditions with no sufficient equipment and the fact they do not have an appointment letter and no facilities. It is a controversial issue.

Appendix 6: interview with Mr. K.M.

The interview with Mr. K.M., an activist on the field, occurred on September 7, 2018 from 2pm until 3pm at YPSA's office in Chittagong.

What is your involvement in the shipbreaking?

Mr. K.M.: I am an activist on the field, and I work for YPSA. I worked 5 years in a shipbreaking yard. I am also a member of a Trade Union. There are 2663 members with one President and Secretary. Once a month we have a meeting. My father was a leader of a trade union. The members are also workers in the shipbreaking yards but sometimes they cannot combine. This is mostly a voluntary job.

What is the role of trade unions?

Mr. K.M.: Trade union works on labour rights, try to give facilities to the workers and advise about their working safety. I visit the yards 3-4 times a week. The workers consider the activists reference persons to whom they may ask for help. They can be considered mediators. In the cases that workers lose their job without any compensation, they contact the trade union, which is responsible to contact the yard owners. If the yard owners do not give them any compensation, they contact the DIFE. Then, the Level Court would be the last option if the previous one does not work. Situations like this can happen 20 -30 times each year.

What do you think about the working conditions in the shipbreaking yards?

Mr. K.M.: Shipbreaking workers are very poor with low salaries and do not have job security to join their rights. The workers come, mostly, from the Northern part of the country and they are maximum 35-40 years old, though, on the field, they find a lot of people younger than 18 years and older than 40 years. Mostly of the workers are not capable to write or read. They come work and they go. They do not have working contracts and they do not get training before they start to work.

What about the use of safety equipment (PPE) in the yards?

Mr. K.M.: The safety equipment is not enough and it is only provided when there are inspections.

What about the PHP shipbreaking yard?

Mr. K.M.: PHP's work is good but not the best. (The interviewee did not want to answer more questions about this topic.)

How do you see the future of the SRI in Bangladesh?

Mr. K.M.: About the future and the practical solutions that could help to improve the working conditions are the dialogue between yard owners, workers and the GoB and the establishment of a safety program training which should be provided by the yard owners.

Appendix 7: interview with Mr. A.A. and Mr. A.B.

The interview with Mr. A.A. and Mr. A.B., the Inspectors of the DIFE, occurred on September 10, 2018 from 9:30am until 10:30am at DIFE's Office in Chittagong. Mr. J.K. and Mr. J.H. were both present during the interview.

What is the work of the DIFE in the SRI?

Inspectors: The DIFE's activity in the shipbreaking begun in 2015. Each month, we inspect about six or seven yards. Our work is controlling the safety conditions in the yards, centred in hazardous work and explosive areas. We control if the workers use the PPE as well.

What about the use of PPE in the yards?

Inspectors: We admit that the situation has improved but the process goes slowly. We know the workers do not use it often and sometimes they use it only when the inspection comes. The workers should be more aware about the risks they take. We try to make the owners conscious about the importance of providing the correct PPE.

How does the process of authorization to open a yard to dismantle a ship happen?

Inspectors: When the MoI, the DoE and the DIFE give permission to the yard owners, then they communicate to the Inspector General who informs us. Nowadays there are about thirty to fifty active yards and this year we have given new licenses to about five to six new yards. When a yard asks for a license, the DIFE, the Explosive and Fire Departments have to give certification, authorizing the yard to open.

Does the DIFE have contact with other organizations, governmental and non-governmental?

Inspectors: The DIFE has mostly contact with YPSA, the biggest NGO involved in the shipbreaking industry.

And with trade unions?

Inspectors: The contact is almost done by trade unions to inform about illegal cases that happen to the workers. They normally deal with general issues such as the cases when the workers lose their job without any notice. In these cases, the workers complain and the DIFE

makes an official letter to the owners. The law says that the owner has to give a “termination benefit” to the employee. It means four months of salary. If it does not happen, the DIFE notice it to the Level Court who takes the necessary measures. In case of accident, the law says that in two working days the employers should inform the DIFE by a written letter. Sometimes they try to hide the accident but nowadays it is not possible anymore because of the pressure of the NGOs, media and the leaders of the trade unions as well. In the 2000s it happened that the employers just dropped the death bodies into the sea without any visibility. On the first quarter of 2018 there were each month three to four accidents reported and fifteen deaths from January until the present day.

What do you think about the future of the SRI?

Inspectors: I think the biggest impact it is because of the poor quality of the yards and the fact the workers are too poor and expose themselves to work in such dangerous conditions. The wages are too low with an average of about 8000 taka a month. Normally the GoB published a minimum wage of 16.000 taka, but it has not been implemented yet.

Why is it so difficult to make the yard owners comply with their obligations, according to the law?

Inspectors: The BSBRA is a strong organization with a huge financial power and influence what makes difficult to the GoB to implement such measures. As everyone knows shipbreaking is a huge source of income in Bangladesh.

Appendix 8: Interview with Mr. Z.S.

The interview with Mr. Z.S., the Sitakunda's local government Officer, occurred on September 11, 2018 from 10am until 11:15am at the local government's office of Sitakunda in Chittagong.

What is the role of your department in the shipbreaking industry?

Mr. Z.S.: In Bangladesh there are 64 districts. I am the Head Officer of this Upazila (Sub-District) and responsible for the coordination of all the departments of Sitakunda. I collect all the information related to the yard permission which is given to the yard owners. When all the information is collected, it should be sent again to the District of Chittagong who gives the final license. During this process there are different departments involved such as the DoE and the Department of Water Resources. The involvement of the Assistant Commissioner of Land Issues (who was unexpected possible to interview) is very important to this process as well. According to him there are 156 yards and around 100 are active at the moment.

What is your perspective about the shipbreaking in Bangladesh?

Mr. Z.S.: It is an industry in which a large number of people are engaged through the creation of employment opportunities. With the SRI, Bangladesh does not have to import iron or steel. The shipbreaking industry creates opportunities to families in having more purchasing power and the children have more possibilities to go to school.

How do you see the role of the GoB in the industry?

Mr. Z.S.: The government is watching everything, and its focus lies on labour issues and safety. The accidents in the shipbreaking are decreasing.

What about the measures the government is trying to implement such as the official minimal wage?

Mr. Z.S.: I do not know much about it but the GoB tries to incentive the yard owners to adopt the suitable measures through official letters.

Should the yard owners make some reports to you?

Mr. Z.S.: It happens in case of anomalies. However, they also have to report how many employers do they have, if they are foreigners. Sometimes, the shipbreaking yards have workers from India, Pakistan, Malaysia and Russia.

Does this Upazila work together with governmental organizations such as DIFE of/and with NGOs?

Mr. Z.S.: This UNO does not have any contact with the DIFE and also does not work or have contact with NGOs.

Appendix 9: interview with Mr. R.S.

The unexpected conversation with Mr. R.S., the Assistant Commissioner and Executive Magistrate, occurred on September 11, 2018 from 11:30am until 12:30pm at the local government's office of Sitakunda in Chittagong.

Mr. R.S. is the Assistant for Land Issues of the Sitakunda local government. In the Deputy Commission, he is the District Collector. He is responsible for collecting revenues from government property land. He performs all activities related to land issues. In the Deputy Commission there are three important offices: Coordination (of the government offices of Chittagong District); District Magistrate (acts in case of emergency, maintaining the law) and District Collector (who maintains the land issues). All the data is communicated to the national government.

In the specific sector of the shipbreaking, Mr. R.S. is responsible for giving license and monitoring the land. When the yard owners ask for a license, they make an agreement according to the government's rules and laws that the yard owners have to respect. He names it a lease. If there is non-compliance or violation of the law, the land goes back to the government and the owners have to suffer some punishments. He also emphasizes that private investors have to respect government's rules and cannot establish their own rules. When I asked about the working conditions in the yards, Mr. R.S. told that the GoB encourage the employers to improve those conditions and to give training to the workers and also try to eliminate child labour. They do it through official letters and also in a verbal way. The DoE tries to make pressure to the yard owners. According to Mr. R.S., the yard owners need private land, otherwise it is not possible to build a shipbreaking yard. He looks to the SRI with a positive perspective, saying that the PHP yard is the first and the only with a "green certificate" in Bangladesh. It can cause competition between the yards which can be seen as an improving mechanism in the shipbreaking industry. The yards are obligated to compete with the others and, in this manner, try to comply with environmental and labour safety requirements.

Appendix 10: Interview with Mr. J.K.

The unstructured interview with Mr. J.K., the President of the BSBRA, occurred on September 16, 2018 from 11am until 1:30pm at the BSBRA's Office in Chittagong. The interview happened at the BSBRA's Office in Chittagong after the submission of a permission letter to talk with the President of the BSBRA. I was received by the Secretary of the President, who guided me to the President's Office where his nephew was present because of the fact the President does not speak fluent English. Thus, the conversation happened in Bangla, being translated in English by the President's nephew.

According to the President and his nephew, there are 152 yards of which 60 are active. There are about 100.000 workers in the yards and thousands of people are indirectly engaged with the SRI. The SRI provides about 80% of steel material which is reusable in different ways. Because of this fact, Bangladesh does not have to import steel. The yard owners should pay government duties and taxes to the government. They try to respect the guidelines for environment and workers' safety, which is controlled by the DoE. The yard owners are trying to improve and invest in the mechanization of the yards and in the working conditions. This year about eight to ten yards will obtain the Certificate to comply with the HKC. When asked about the minimum wage approved by the GoB, the President said they even pay more than 16.000 taka, fixed by the GoB. It also depends of the work, if the worker is a cutter or a helper. They pay, on average, about 25.000 taka to the cutters. The other workers receive between 15.000-20.000 taka with free accommodation and medical facilities. Every yard has a first aid facilities and a doctor. There is also an ambulance available from the BSBRA' hospital, where the workers are transferred in case of accident. In case of a worker's death, the yard owners should pay about 500.000 taka and, in case of accident, the amount depends of the severity of the accident and the needs of the treatment. In case of death this amount of 500.000 taka is not in the government's rule, it was established by an agreement between the Deputy Commissioner and the BSBRA. When the treatment cannot be given in the BSBRA hospital, the workers are transferred to a public hospital.

The BSBRA collects some data such as the number of ships imported and the accidents. If a worker dies, the yards have to follow the government's rules and inform the police station and the BSBRA, who informs the government authorities. When I asked about some

connection with the DIFE, they do not have any contact and do not even know what it was when I talked about the DIFE. About the use of PPE, they said it is a mandatory rule for the last ten years and it should be respected. The accident level is dropped because of that. The government is monitoring very hard. When I asked about the way this monitoring is happening, they told that it is a government's control, which is made by the Ministry of Environment who gives permission to the entrance of the ship in Bangladesh. The government makes the control of the new ship, controlling if it is free of hot wash and explosive gases. After the ship is beached, they have to control the vessel again. They also control men safety conditions. The permission is then given by the government, through the DoE, and the BSBRA has to give permission as well. About the sale of ships from the OECD-countries to Bangladesh, they say the ships are bought by a contractor in cash-money and transferred to places like Singapore and Dubai before coming to Bangladesh. They think that shipbreaking is changing every day. New technologies are coming, and they are adapting to new things in order to improve the yard conditions, the environment and workers' safety. When asked about a possible financial private-public partnership between the yard owners and the GoB, the President said it would be possible like it happens in India. He also referred that it already happens in question of policy. The yard owners in Bangladesh have contact with India and Pakistan. They mentioned the fact that in India the government give some financial support to the industry. About the idea of working or improving the dialogue with NGOs or trade unions in order to improve the workers conditions in the yards, they said that with trade unions there is no problem, they give sometimes some workshops to the workers. In the case of local NGOs, the contact is not possible because they cause a lot of problems. The yards are only concern in following the government guidelines.

Appendix 11: interview with Mr. V.S.

The interview with Mr. V.S., the President of Chittagong Union of Journalists, Chittagong Correspondent of Thomson Reuters and Chittagong's Special Correspondent of Bangladesh Post, occurred on September 18, 2018 from 5:30pm until 6:30pm at Mr. V.S.'s office in Chittagong.

How long are you reporting the issues of the SRI?

Mr. V.S.: I am the President of the Association of Tv's and the newspapers from the Chittagong's District. I defend the journalists. I made the first report about shipbreaking, twenty years ago. At that time, I met Mr. M.F. and we were both interested about the environment pollution caused by the SRI.

Do you have connections with the international media?

Mr. V.S.: I am also the correspondent of Reuters in Bangladesh and from Bangladesh Post, an English newspaper.

What difficulties did you face?

Mr. V.S.: Doing reports about shipbreaking was very difficult and some yard owners tried to manage the reporters. Nowadays I try to combat this kind of corruption. Sometimes the yard owners try to stop the publication of some reports through corruption. They are very influential and the most powerful stakeholders in respect to economic power.

Which impact do you think media have in this issue?

Mr. V.S.: When there is an accident, it is published in newspapers like The Independent and Daily Star, where comments about the accidents and of the workers can be read. For the last four to six years the pressure of the media in this issue has increased. The most critical issues are related with the safety of the workers, the need of investment in modern technology and the way the scrapping of ships is done. The fact the workers do not have an appointment letter, no work contract, it is also a big problem.

Appendix 12: interviews with workers of the shipbreaking yards of Chittagong

The interviews with the workers were realized on September 21, 2018 from 11am until 2pm in a village near the shipbreaking yards in Sitakunda. The interviews were based on general standardized questions and realized in Bangla and translated to English by the two co-assistants, Mr. J.K. and Mr. J.H. These interviews happened always on Fridays in the afternoon, because it is a holiday and it is the only period when the workers are home. The general questions were:

- What is your name? How old are you? Where is your home town? How often do you go back? Where do you live now?
- Why did you decide to come to the shipbreaking yards?
- How long are you working in the yard? Did you work in another yard before?
- How many days and hours do you work? How much income do you receive per month?
- Do you have a work contract? Have you ever been injured? What happened in that situation?
- Are you supervised during your work by other workers or supervisors?
- Do you use PPE?
- How do you feel working in the yard? Do you feel supported by anyway?
- Did you know about the risks before you came to work in the SRI?
- Do you have some facilities, such access to drinking water, toilets, housing?
- How do you see the future of shipbreaking? What are the challenges facing this industry today? Which goals do you recognize for the future?

Mr. U. J. is 40 years old and is from Chittagong. He had an accident in 2017 and he cannot work in the shipbreaking anymore. His leg was broken, and he has iron plates in his leg. Now, he works as a security guard at night. Although he receives less money than in the yard, he states that it is a safer job. Since his accident, he cannot do heavy work and he has to use crutches all the time. At the time of the accident, he did not get a compensation. He had an agreement with the yard owner, who started to pay his treatments. However, and after a short time, the owner said that he could not pay more money to his treatment anymore. Then, Mr. U.J. got help from YPSA.

Mr. M.J. is 35 years old and he works in the shipbreaking industry for 25 years. He is a cutter. He told that, during the work shift, there are supervisors and also a camera system. He uses PPE such as helmet and shoes. When I asked him what it could be done to improve the conditions of his job he mentioned: more equipment and better wage. He came from the Southern part of the country (town Noakhali) with his family, who went back to their hometown, however he decided to stay. He was a young boy when he started working in the shipbreaking. Once a year he visits his family. In all these years he has worked in different yards. He lives with his family in a small place in a slum area called Sonaichori, in Sitakunda. They live with 5 people in a place of 10x8 feet. He rents that place for 1500 taka a month. He has 3 children, the oldest of them (16 years) works with the father in the yard and the youngest goes to school. He is not satisfied working in the shipbreaking, but he says that there is no better job he could have with proper amount of money and where he could get more than in the shipbreaking. He works fourteen to sixteen hours a day (7am-9pm) with one hour for lunch that he has to get from his own and receives 350 taka a day (43 taka/hour). He receives his wage from the work he does and not at the end of the month. They also cannot work thirty days in a row because of the physical weight of the work. He works about fifteen days on a month and receive about Taka 7000. He tries to work so much as he can to get more money. He was never serious injured, just small injuries due to small accidents. In that situations, he was assisted by a paramedic from the yard. He did not go to the hospital. About the technical training, Mr. M.J. was one of the twenty people who got training six months ago. The training happened in seven days and the yard organize it from time to time to small groups of workers. Each time it happens, the training is given to different workers. According to him, this training does not happen in every yard.

Mr. V. S is 24 old and works five years in the shipbreaking. He came from the Southern part of the country and he lives in the slum with his family. They are four people. His father works in the jute mill, his brother goes to school and his sister got married and does not live with them anymore. He had to start his work on the shipbreaking because of financial problems. He is a cutter and receives 380 taka a day. He has worked in different yards. Nowadays, he works in the Z. S. yard. He uses PPE such as helmet, glasses and safety shoes. He has never been injured. For the future, he wants to find a better job or even go abroad (Saudi-Arabia or Dubai). When Mr. M.J. and the Mr. V.S. were asked if they feel supported in anyway, they

told that only by YPSA. Not even by the trade unions. They do not even have contact with them. They also told that the contact with trade unions is prohibited in some yards.

Mr. H. M. is 30 or 32 years old (he does not know it for sure). He works seven to eight years in the SRI. He has worked in one yard until now – the KSRM yard. His family has four people with two children, who go to school. He comes from the Southern part of the country and he visits his family once a year. Normally, in the slums, where the workers mostly live, people are divided in groups, those who come from North and from South of Bangladesh. Mr. H.M. is a helper, so he only gets a helmet as PPE. For him, the shipbreaking industry gives no security and stability as a job because the workers are paid according to the work they do. If the work is done and there is no ship anymore to dismantle, the workers have to find another job.

M. U. M. is 22 years old and has three years of experience in the shipbreaking. He studied until class eight. His hometown is in the South of the country, in Chandpur. His family lives there. He lives in a bachelor (a place where workers live together, sometimes five people in one small place) and he pays 500 taka a month. He works in Z.S. yard as a helper with Mr. V.S. He uses helmet and a vest. He works about twelve hours a day from 7am-7pm and receives 280 taka a day. For Mr. U.M. it would be important that the owners could provide more PPE. He decided to work in the shipbreaking because of financial problems which he considers it had helped him and his family. If he gets a better opportunity he wants to change.

I visited the area of Shitalpur in Sitakunda with Mr. J.K. on the 13th of September of 2018.

The interview happened with the mother of a young worker who died in the yard. K. was 20 years when he died in 2016. He worked in the shipbreaking for six years. He started when he was 14 years old and he worked as a cutter in the S.B. Yard. As the mostly workers he also worked around 24-26 days a month during the day from 9am-10pm. When he worked fifteen days, he received about 3500 taka. He studied until class five before he started working in the yard. He was the only person who worked to support the family of five people. Now his brother is the only of his brothers who works. He has a job in other industry because his mother is afraid that he works in the ship breaking. One of the daughters goes to school and the other is got married and does not live with the family anymore. When Karin died, the

family tried to obtain some financial compensation. One month after the accident the employer gave them 50.000 taka and two months later, after the process has sent to the Level Court, the family got more 100.000 taka. For K.'s mother, this amount of money was not enough. During our visit, the family also told that if some locals see foreigners walking around this area, they may suffer pressure and asked about why they are talking with foreigners. Those people have some connections with the employers, and they act as informants.

This interview occurred with the family of a worker who got serious injured and died. U. N. was 36 years old when he died. He had an accident in 2007 when he suffered a fracture of his spine and he could not move well anymore. He stayed at home until 2016, laying on bed until he died on October 18, 2016. At that time, he worked at M.E. shipbreaking yard. He started to work on the shipbreaking when he was a child. His family and U.N. are local people from Chittagong. They are five people living together and only the brother works to support the family. His decision to start in the shipbreaking was, as mostly of the workers, due to poverty. In the period he was sick he did not get any compensation of help from the employers. Mr. M.F. and Mr. J.K., from YPSA, tried to help him to get some treatment and medication with their own costs, but it was not enough. YPSA also supported them in the Level Court for a compensation, which he received two years later. A compensation of 125.000 taka.

We have visited the school of YPSA in the village of Courf Para, where YPSA started the Macro Credit project and we have met the coordinator of the project as well. They try to help poor people from the village and also support the children who have worked in the shipbreaking yards, giving them technical and life skills training, which lasts for three months. In the last years, YPSA helped 180 children who worked in the shipbreaking yards to change their lives. There was a training with twenty-five children, six months ago. Now, since end of July until end October (2018), a group of fifteen children with ages between 16-18 years old are getting training. They work as electrician, in small shops, etc.

S. K. is 17 years old and he worked for two years in the J. S. shipbreaking yard from 7am-7pm. He went to school until Class seven, before he started working in shipbreaking. His family are local people from Chittagong, and they live in the village Court Para. There are four people at home: his parents, his brother and S.K. His father and him are the only ones who work and

get income to the family. His brother will go to school next year. In the yard he helped in the field as cutter helper, drawing iron pieces. His wage was about 5000 taka a month. Now, after receiving technical training, he works as electrician self-employ in housing and he receives about 7000 taka a month and works eight hours a day. He told us that he feels safer than when he worked at the yard. Mr. J.K. found him three years ago when he was leaving the yard after his work and tried to talk to him, encouraging him to leave the work in the shipbreaking. For the future, he aspires to be an Engineer.

This interview has occurred with the K.'s brother. He is 21 years old and works in the shipbreaking since he was sixteen. He works in the P. S. Yard as a cutter, inside the ship. He does not work in the same yard as his brother. The workers in that yard receive money according to the specific work they do. There is no written and legal contract, a situation that happens in most of the yards. For Mr. J.K. this kind of policy takes a lot of risks to the workers. He had small injuries and works about twenty-six days a month. His wage is between 10.000-14.000 taka a month. He studied until Class five and he wants to keep his job because he thinks there is no chance to find another job without experience. He only has experience in cutting. During his work he has to buy all his PPE at the local markets. He works only night shifts, from 7pm-7am.

Mr. J.K. told me that, sometimes, he can come inside the shipbreaking yards just with a card of another worker. There is a card without photo, just with the name. They cannot recognize and control if Mr. J.K. is a worker or not.

Appendix 13: interview with Mr. M.F.

The interview with Mr. M.F., the Project Coordinator of the NGO-SP in Bangladesh and a YPSA's member, occurred on September 23, 2018 from 2pm until 4pm at YPSA's office in Chittagong.

How did your involvement in the SRI begin?

Mr. M.F.: Everything began in 2005, when an accident with a Norwegian ship happened and was reported by a journalist. Then, the government of Norway wanted to help Bangladesh in this situation. This process started through the MoI of Bangladesh, who did not contact the local NGOs. In the same year the "End of life ship" report was made, being the first international report made about the SRI. This report was given to the United Nations. At that moment the partnership NGO-SP between me and J.R. started. India and Bangladesh were the first countries who made part of the NGO-SP. In 2005 the famous video of National Geographic was published and the report for the WB was made in 2009. 2009 was a crucial year in the shipbreaking industry in Chittagong. Since that time, things have changed a lot. It was a turning point: the accident with the Norwegian ship and the moment of the HKC. There are always media reporters contacting for me who are interested in achieving the yards to make reports.

When did you begin working with YPSA?

Mr. M.F.: I have started working in YPSA in 2007. When there is an accident with a ship, I make the contacts in order to obtain a compensation to the workers or families. If there is a refuse by the yard owners, I inform the media and the concerned authorities of the GoB (MoI and DIFE) to ensure this compensation.

And what about research? Where do you believe there is a lack of research in the SRI?

Mr. M.F.: There are a lot of issues that YPSA cannot make research about because of the lack of time, such as interne health injuries such as intern bleedings, child labour and the worker's recruitment process. Moreover, there is not a scientific proof that those internal injuries are caused by working in the shipbreaking yards. About child labour there are a lot of pressure from the national government to the NGOs in order to help eliminating it. There are a lot of work in the shipbreaking yards but when there is no ship the workers just lose their jobs

without compensation. In some cases, they get a specific time to dismantle a ship and they organize their time of work by themselves. They get a kind of deadline to dismantle it. Each group of workers has a leader and the cutter helper is often a young man. They are paid at home in advance, though, when they lose their jobs (there is no ship and thus no work; or they get injured, for example) they have to go back to their homes without no income. It is a vicious circle process. The workers come from the poorest part of the country. The PHP shipbreaking yard is the only which has the HKC Certificate. They want to comply with international standards and in change they get discounted ships. It needs investment because of that it is just PHP yard who has the better conditions. You have to look to their website: PHP Family.co.

What about the environmental impact of the SRI in Chittagong?

Mr. M.F.: Dr. N.T. made research for the GoB and to NORAD. In his research he shared different visions from those from the NGOs. He made a report together with the MoI which the first phase including the social, economic and environmental impact and the second one the training process which is planned to start in 2019. I was invited to join the last meeting, but I just received the document at that moment, from which I should give feedback at the same day. Chittagong has a huge potential to live from its resources because of the great diversity of fish in the coastal area. It is a costal district. The problem is that the GoB never took the adequate measures to protect its environment and to give the possibility to the people to be dependent of its resources and, in this way, developing the fishing activities and the region. Many kinds of fish are highly sensitive to sea pollution and migrate to other areas in the deep sea. Nowadays, due to the pollution of the Bay of Bengal, fishermen should go into the deep sea if they want to get good fish. The diversity of fish in this area were so diverse though it is decreasing the last years. It influences the food chain as well because men eat fish affected by the pollution. It is a circle. I think that Dr. N.T. had a good opportunity to prove the huge damage of the shipbreaking in the environment of the Bay of Bengal, although everyone knows that shipbreaking is not an isolated phenomenon. however, the chemical and hazardous materials which come from this industry are very specific and it should be possible to detect and prove during a research.

Appendix 14: interview with Mr. R.M.

The interview with Mr. R.M., the Deputy Secretary of the Mol, occurred on September 25, 2018 from 10:30am until 12:30pm at Mol's office in Dhaka.

What is your background?

Mr. R.M.: I have a background on agriculture science and a master on business and administration in London. I work for the IMO and I am also a member of the central service of the GoB.

What is your role in the shipbreaking industry, representing the Mol?

Mr. R.M.: I am a neutral person, representing the IMO in Bangladesh and in the government. Before 2011, the shipbreaking was not recognized as an industry. The government has done it to put more attention and give more importance to the issue. With this measure, the government could be capable of making a policy in the shipbreaking. So, since 2011, the Mol is responsible of administrative issues of the SRI such as land issues. The establishment of the SRI, in 2011, had the objective to improve occupational health safety and reduce the negative impacts of the SRI. This was the start point of the policy of the GoB in the SRI. It is the responsibility of the Mol to regulate the SRI sector. An important contribution of the SRI is that it gives 60-70% of iron for the Bangladeshi demand. A project, together with the technical assistance of the IMO, has finally started in 2015 (the IMO-NORAD SENSREC Project). There are two sides which generate controversy in the SRI: one is that the SRI only causes pollution and does not contribute to the economy, and the other side is the economic advantage from the industry. I am the project Manager of the IMO-NORAD SENSREC Project. The project has two phases:

1. The first phase has begun between 2015-2017: studies about the environmental and economic impact; preparation of a planning about the management of hazardous materials; workers' training.
2. The second phase has started in June of 2018 with the support of the Norwegian government and the IMO. It includes the analysis of national legislation in order to improve it and try to approach an effective implementation and complaining with the HKC standards. For Mr. R.M., Bangladesh is "far from the HKC, but we are preparing

the ratification for the Convention". He adds that the willingness of the yard owners is very important and working with them to try to ratify the HKC is crucial.

A model of technical training will be adopted in dialogue with the ship recyclers, trade unions (representing the workers) and the local government. In February of 2018, the Bangladesh Ship recycling Act has been approved in order to analyse how the SRI sector will evolve within the next five years. This is the period that Bangladesh has to ratify the HKC. During this process, the MoI invites different stakeholders to different meetings to discuss the issue. The next meeting will take place in November of 2018.

What about the yard permission obtained by the yard owners?

Mr. R.M.: About the yard permission... the yard owners ask for permission to different entities: MoI, Department of Environment, Navy Military Department, Department of Explosives, Chittagong Port. The problem is that this is a very long process with a lot of bureaucracy, which takes from each entity about one to three days. However, according to the law, it is not permitted to ignore these steps. Because of that, the GoB has created the BSRB, approved in February of 2018. The goal of the Board is to centralize this process in Chittagong. Nowadays, the yard owners and the ships have to get permission: first the NOC permission; the second permission, the permission of the bank, a letter of credit; the third permission is apply to the MoI, also the beaching permission and inspection report are included; the fourth permission is the ship cutting permission.

What about the use of PPE?

Mr. R.M.: The workers come from an agricultural environment and are not aware of the use of this kind of equipment. The GoB wants to give technical training to the workers and form a data-base. Only the workers who had have training, can work in the shipbreaking yards. This training has been designed from the World Maritime University together with some other universities abroad. The workers will also have an ID Card. This is also part of the second step of the SENSREC project. The workers, represented in the Board by the trade unions, have to discuss the main problems with the Ministry of Labour. The minimum wage for the shipbreaking workers is approved by the Ministry of Labour, though it is the responsibility of the MoI to implement it. However, the priority is the workers' training. It is a long way to go.

How do you see the beaching method considering the impact of the SRI?

Mr. R.M.: The HKC does not prohibit beaching. The European Regulation has a double standard: on one side, beaching is not allowed and on the other side changing the flag is legal. The method of dry-dock, this method is too expensive, requiring a huge initial investment.

Would a public-private partnership be possible to improve the shipbreaking conditions?

Mr. R.M.: A Public-private partnership would not be possible because the GoB does not have this kind of economic capacity to support such an investment

Appendix 15: interview with Dr. N.D.

The interview with Dr. N.D., a lawyer specialized in international maritime law, occurred on September 25, 2018 from 4pm until 6pm at Dr. N.D.'s office in Dhaka.

Dr. N.D. has made his PhD about the ratification of the HKC in the SRI in Bangladesh and India. For him, the dominant stakeholders are manipulating the law and have created their own politics. Dr. N.D. explains that the law is flexible to them and that the international law is broken, creating a dilemma. In his opinion, the local does not work effectively. The implementation in Bangladesh is not possible and, according to him, the main problem is the HKC. He adds that the EUSRR creates some debate on the simple thing that ship recycling is not happening in Europe, it is happening in the developing world.

Who do you think are the dominant stakeholders in the SRI in Bangladesh?

Mr. N.D.: The BSBRA is the most dominant stakeholder. Workers and environmental activists are the least dominant.

In what way do you think the impact of the industry is linked with neoliberal politics?

Mr. N.D.: Cost externalization under the reign of capitalism. Market deregulation is a result not the cause.

As environmental activists, do you mean NGOs? How do you see the role of NGO-SP in Brussels?

Yes, I mean NGOs. The NGO-SP does not have any major impact in Bangladesh law making like other international NGOs.

In what way do you think there is an interconnection between political and economic spheres in the industry in Bangladesh?

Mr. N.D.: Like in all developing countries politics is a means of attaining economic power. Bangladesh is a vivid example. The SRI is a classic example.

What does sustainable development mean for you in the SRI? How do you think it can be achievable?

Mr. N.D.: The HKC hardly produce any domestic law that regards sustainability. The HKC is too pro-business where little can be achieved.

Do you think there are conflict of interests in the IMO that could hinder sustainable practices?

Mr. N.D.: Yes, conflict is there. Unless a major overhauling of this convention is done little is expected. Under the HKC the principle stakeholder, the shipowners, has apparently no responsibility. The responsibility only vested upon them is preparing the Inventory of Hazardous Materials, which any technical person can understand that as something called eye wash.

Appendix 16: interview with Mrs. J.R. and Mr. N.R.

The interview with Mrs. J.R. and Mr. N.R., the Director and Founder of NGO-SP and the Communication and Policy Officer of NGO-SP, respectively, occurred on October 24, 2018 from 11am until 1pm at the NGO-SP's office in Brussel.

The interview has started with the topic of cash-buyers. Mrs. J.R. and Mr. N.R. refer that Mr. C.E. is the project coordinator of the SENSREC project, but he also works for the largest cash buyers' s company, the GMS.

Mr. N.R.: If you have 150 shipbreaking yards in Bangladesh, 100 in India and 50 in Pakistan, in total there is a market of cash buyers. We can say that, essentially, 10 companies control the market. And the GMS is one of the greatest ones, if not the largest one. It has a big share of the market. They are very closely linked to the beaching yards as well. A member of the GMS is linked to the brother of someone who owns a yard in India. They are a kind of the extended army of the beaching yards and the ship who ends up in South Asia would have passed through a cash buyer. So, they are closely linked. The cash-buyers register and change the flag, paying the exchanges in cash. This should be questioned.

Mrs. J.R.: They are very closely linked to the beaching yards as well. I mean... a member of the GMS is the brother of someone who owns a yard in India... they are kind of the extended army of the beaching yards and the ship who ends up in South Asia would have passed through a cash buyer. So, they are closely linked.

Is this related with the issue of changing the flag?

Mrs. J.R.: The other one is that they register and change the flag. They pay the exchanges in cash. This should be questioned...

What about your proposal about the EUSRR?

Mrs. J.R.: We have been very critical to the IMO, who owns the HKC. We have been supportive on the stand of the EUSRR on the ship recycling sets. But we have been concerned with the ease that the law can be circumvented by simply flagging out.

What about the EUSRR's list of ships? So, they do not look into these rules and just make the necessary measures to change the flag and send the ships to South Asia? What do you think it can be changed to avoid it?

Mrs. J.R.: We have been advocating very strongly for a financial incentive, a kind of having a saving for ships, which is what the industries of electronical materials, fridges, washing machines have. So, there is a model that has been developed by the University of Rotterdam for the EC, which is called the Ship Recycling License. Every ship that will trade in Europe would have to pay money to have a license of ship recycling. That money will be accumulated during the operational life of the ship and the last owner would get that money back if the vessel is recycled on a facility in the EU. It is a kind of a financial skin to ensure that the ship owners chose the proper facilities.

The PHP yard...It is the only in Bangladesh who has the green certificate, right?

Mr. N.R.: ...the statement of compliance with the HKC.

Mrs. J.R.: It is not a certificate. We have criticized that a lot for green washing beaching yards. And you have private companies, consultants, etc ... that are using the HKC by themselves and interpreting the requirements and issuing the statements of compliance. We think that this yard maybe is able to comply with the HKC. And the Italian Classification Society has issued the only one in Bangladesh to that the PHP yard, and, along with India, we can say that half of the yards have this...

Mr. N.R.: Yes, 66 yards have the statement of compliance ... In India there are around 100 yards, which maybe 70 are operational now.

Also in Pakistan?

Mr. N.R.: No, zero. Now, the industry in Pakistan is closed after a few accidents that happened last week. So, they closed down all yards...You can read it on our latest press release on the website.

It is also what happened in Bangladesh with the pressure of BELA in 2009?

Mrs. J.R.: In 2009... when the Supreme Court closed all yards.

Mr. N.R.: Did you speak with someone of the PHP yard?

No, not yet, I will try. Maybe because it will be interesting to speak with them.

Mrs. J.R.: Comparatively, if you look into the yards in Bangladesh and you look into the PHP yard, PHP is much better. But then if you compare it to higher standards, how it should be then it still has a very long way to go to be able to claim that they operate safely and in an environmentally sound way. The vessels are still broken in the intertidal mud flat. The PHP is a big company in Bangladesh.

The KSRM is also a powerful company, no? We see their logo everywhere in Chittagong.

Mrs. J.R.: The PHP and the KSRM are everywhere in Chittagong.

However, the SRI is also very important to the economy. It is a fact.

Mrs. J.R.: The GoB collects a lot of taxes. With the broke of vessels, the steel is used for construction purposes. But I mean...these companies are also interlinked, the shipbreaking yards, the re-rolling mills, the construction industries. The KSRM is a good example. They have one of the big construction companies in Bangladesh. And it is a cheap way to them to get raw material.

About beaching...

Mrs. J.R.: The pollution is contained, waste is separated, safely use of cranes, accesses for ambulances...Dry-dock is probably the best way to contain pollutes but there are many other ways, like floating docks, using slipway to bring the vessel upon.

The investment is very high to achieve these standards, no?

Mr. N.R.: Well, it depends because if you want to build dry docks in Chittagong, where they currently beach the vessels...yes, it requires a consistent and significant investment. But if you start using infra-structures that are somewhere else in Bangladesh or you build a slipway in a port that requires less investment and you can convert facilities that are already there, but Bangladesh has this kind of inherent problem of downstream waste management. You do not have a lot of facilities in specific areas of the country, and probably in all the country, to deal with certain waste streams. So, that is something that has to be built.

Mrs. J.R.: Probably it is a high cost to ensure...Under the SENSREC project there is a pack which is dealt by the IMO and another pack which is dealt by the BC with the money from the

European Union, which is meant to identify the source of pollution between different industries in Chittagong, to handle with hazardous wastes, to gather and identify the way streams and the necessary capacity to build in the area. This is probably a larger investment than beach a vessel.

So, as some stakeholders state, the yard owners have the financial capacity to invest and improve as well as to create better conditions to the workers.

Mr. N.R.: Why should they do? There is no enforcement and the authorities are not really applying the letter of the law...

Mrs. J.R.: It is not a lack of money...

The GoB supports and tries to implement the SENSREC project, but they are not willing to give a financial support to it...

Mrs. J.R.: It is for the companies to do it.

Because they are more powerful than the GoB itself?

Mrs. J.R.: I am not sure who has the most power but usually the GoB installs the legislation and makes sure that legislation is respected and demands from the companies to operate in line with that legislation.

It is the GoB who gives the permission to a yard to operate...so it is a very controversial situation...

Mrs. J.R.: If you look into 2009, when the High Court was very clear on which measures were important to environment clearances in Bangladesh and I do not think any of the yards have an environmental clearance where they actually comply with all the requirements. The environment clearances have been issued and the yard complies with 10 to 60 requirements, which gets around six months to one year to fulfil the requirements. Then this term is extended and extended...so the case BELA is litigating and is still ongoing. About the 2016 High Court case, it is on our website... some of the government officials and the BSBRA yard owners have to explain why they do not have complied with the Court order.

Is BELA still involved in the shipbreaking issue? I tried to talk to them in Dhaka, but the reference person was not there, so I could not talk to anyone...

Mr. N.R.: They work a lot in compensation cases for the shipbreaking workers.

Mrs. J.R.: They are also involved in the litigation of the NOC producer, which is a vessel in Bangladesh demanded to be checked for radioactive material on board, out of the breaking. The case is still ongoing, and the judgement is expected. Hopefully, this year...Bu they are still pretty much involved in following the previous cases and new ones.

What is the difference of the SRI between the Southern Asian countries, Bangladesh, India and Pakistan?

Mrs. J.R.: Neither in Bangladesh nor Pakistan, there is any infrastructure to deal with hazardous materials. In India you will find a bigger capacity, land fields and different infrastructures to deal with some wastes, whether if the wastes are going to these places it is another question but there is more infrastructure in India. The geography is different, they all do intertidal beaching with the tide, but Bangladesh can take bigger ships because of its geographical advantage. The worst according to environmental standards.

Mr. N.R.: Pakistan has a huge tide and deeper. It will be easier to upgrade a yard in Pakistan rather than in Bangladesh or India, based on the geography. The weight of the industry in each country is completely different. About the use of steel, in Bangladesh 40% of the national use of steel is coming from the shipbreaking, while in India is just 3%.

Mrs. J.R.: India has its own iron sources.

Mr. N.R.: Let's say, if the industry would close ... in both cases you have thousands of workers losing their jobs, but in Bangladesh the economy would be more sensitive. In Pakistan the figures are not very clear. Now they are not importing many ships because of the price of steel and the crisis in the country.

Mrs. J.R.: There are many countries which do not have iron and import steel for national consumption but do not break vessels on the beach, so, I mean...

What about the case of China...They are only recycling their own ships, right?

Mr. N.R.: They were open to the international market and they had subsidies for Chinese ship recyclers to break Chinese vessels but now they closed everything. They are in process of closing all the import of international vessels and they also applied to include the European List of ship recycling yards approved by the EC. Environmentally it is good because they have

stopped to import waste from other countries but, in another way, it is a pity because China has good facilities to recycle vessels.

Had China financial support from the government?

Mr. N.R.: Yes, but in China there are other concerns, such as worker's rights. Trade unions are almost inexistent. If we talk about the process of breaking ships, beaching is banned as it is not allowed in China anymore.

What about the worker's accidents in Bangladesh? Which evolution do you see?

Mrs. J.R.: We have seen ups and downs. It is not very transparent. What we have seen is when there is an accident, the owners blame the workers and claim that the workers break the rules, that they are working when they should not be working, that they are drunk...There are also cases with children, where they reject that they have employed the children. There is still a lack of responsibility by the yard owners.

Which evolution do you see in the shipbreaking issue? What about the pressure of the NGOs? In which way does it contribute to improve the conditions?

Mrs J.R.: It is definitely more awareness of the problems amongst the government officials, amongst the industry stakeholders but also amongst the workers. The organizations have talked to many workers, organized trainings, etc. There is an increase of awareness of the danger but there are still a lot of accidents, the vessels are still beaching, the government is still allowing the import of ships with the hazardous materials on board. But the necessary change is not coming yet.

The technical training does not exist in all yards, no?

Mrs. J.R.: YPSA and OSHE are able to do training in worker's rights but technical training is probably still lacking. There is also a problem that there is a migrant worker force, who constantly changes.

How did you form NGO-SP?

Mrs. J.R.: Before the Platform was created, Greenpeace had a very big campaign on the issue. At that time, when I started working, they were campaigning about a vessel who was being

exported illegally to India. There was a coalition of European NGOs which were demanding that the European Union should take responsibility for its own ships. Then, I came from the University. I have studied political sciences and I organized a successful event on the issue, looking at development and legislation, and I got the job, representing the NGO in Brussels.

You are the only NGO representation in Europe about the SRI, no?

Mrs. J.R.: There are some others, time to time, but we are the only global international coalition. We talk to anyone who is working on the issue. We participate in negotiations, at the IMO, at the BC. We are very active in the EC. And I think one of our strengths is that we have strong representation in South Asia.

I had the feeling during my fieldwork that YPSA is very important in Bangladesh, specially to the workers...

Mrs. J.R.: It is a very difficult industry to organize because it is forbidden to organize on a sector level. It is just allowed to organize on the yard level. We have had cases where the yard owners put political pressure on rejecting the creation of a trade union at the yard. Without having the possibility to actually create the sector representation, it is very difficult to trade unions, I think.

Dr. N.D. has made his PhD about the weaknesses of the HKC and the international law...

Mrs. J.R.: It is a Convention which has been made up by the IMO, which is very much pro-business. There are the big flag States that have more power and the big flag States are Panama, Liberia, Marshall Islands. It is not because these countries have many ship owners, but it is because they are attractive flags due to tax reasons, etc ... for European, Japanese owners. So, you are asking the criminals to make their own law and to punish themselves...they will not do it. Many times, during the debates at the IMO, we gave many submissions on why beaching is not environmentally sound and should be phased out. But it was always rejected and became clear to us that the only real objective of the HKC is to let the situation so as it is. Maybe improve it a bit so as to avoid the big explosions, etc. But it creates a kind of sleeping pill in the sense that "we are dealing with it, do not do anything, it is fine" but it is not...It was a sleeping pill even for the EU for a long time. They started

working on the issue in 2006 but then quickly they were kind of stacked because they said: well, now the IMO is doing something, we do not have to do something...

So, the European Union had, somehow, given the responsibility to the IMO...

Mrs. J.R.: Yes, they stepped out and then the IMO has been established in 2009. Then it was seen that not many countries have ratified. Some stakeholders were sustaining that it was not good enough. You need to have something stronger...Two years later the EC again started to look at their own piece of legislation, which it is better than the IMO.

Is it correct that the European Union and the IMO work together, a kind of partnership?

Mrs. J.R.: The EUSR has looked to the HKC for trying to stream it but they have such high requirements for the operation of the yards, for the downstream waste management, for labour rights, they also ensure an independent system for checking whether the yards actually are operating against the standards, which the IMO completely approves and will be up to act in Bangladesh to say whether the yards are complying... If the HKC enters into force, Bangladesh would be the country responsible for saying whether the yards are complying or not. All the yards are operating despite the High Court order ... you could quite easily deduct that it will not change much under the HKC. They will just say it is fine and then you have on the other side, the flag States, that the cash buyers use. These States would be the ones responsible for implementing the law. The Bangladesh on one hand and the flag convenience on the other. Is it very naïf to think that it is going to work or is it the purpose to continue as business as usual?

How do you see the work of YPSA, specific from the project-coordinator in Bangladesh, Mr. M.F.?

Mrs. J.R.: M.F. is working in the shipbreaking issue for a long time, he is from Chittagong. He has established a very strong network of contacts and I think he has also established a very good contact with many of the workers. They trust him in many ways. We give his contact when journalists call...we direct them to him because he is very knowledgeable in the issue and how to go around. He is also the one who is very exposed. So, it is not always easy. To be able to help the workers, you, at some point, need to have contact with the yard owners, to be able to do it properly and when you at the same time also are campaigning against or

letting about the concerns of the yards...you do not get the friendship of the yard owners. The situation is difficult, but I think YPSA and M.F. are establishing good contacts with the local government as well and prompt them successfully to take the SRI in doing inspections, especially on the child labour issue, to do night inspections, etc.

In what way does NGO-SP see the SENSREC project?

Mrs. J.R.: From the very beginning we signalled to NORAD, the Norwegian Agency for Development Cooperation, which provided the initial money, that, according to NORAD guidelines, civil society should be strongly involved in the country where the project has been developed but what we have seen is that the project is always invited YPSA, OSHE and BELA to access the meetings only at the final stage. This stage is where decisions have already been taken. We have been unable to actually contribute actively to the project.

So, you just listen what it is going to happen...

Mrs. J.R.: Even issues which we have signalled such as child labour and the social human impact. The two reports from the IMO, part of the SENSREC project, are extremely poor and we have criticized that. We have alerted the IMO and the NORAD. We have linked it to a conflict of interest of the project Coordinator, who is C.E., who works for the cash buyer.

Mr. N.R.: These are things reduced by the report. The final reports of the project are taking into account the economical weight of the industry in Bangladesh, but they do not even consider the environmental and social impacts. That is not a serious way to conduct a field research. I mean, you have to take into account what the costs and not only the benefits are.

Mrs. J.R.: There are the fishing communities, cost of toxic hotspots, cost of workers being sick, cost of deaths...

Mr. N.R.: Child labour again was not included...

Mrs. J.R.: There are 3 reports: one on the economics, one on the environmental impacts of the yards and a third one, which is Basel, not IMO, which is mapping the waste streams in the Chittagong area, which is very poor as well.

In the reports, it is stated that the shipbreaking is not an isolated phenomenon, there are also other industries which contribute to the environmental degradation in Sitakunda, as well.

Mrs. J.R.: Anyways, there is a lot of pollution in the area and it is difficult to know from where it comes from...

Mrs. J.R.: About the political dynamics in Bangladesh ... I mean there are these omnipresent companies, who own the shipbreaking yards as well. We see that they have many links to the local parliament. There is a very good documentary from Bangladesh, which is very revealing of the social structure, how the workers are recruited, what they feel when they go home. It shows quite well the power of the yard owners. Even if it is from 2005, it is not that different from now, unfortunately. The PHP yard is also very good connected. They invited the Ambassadors from different European countries to come to visit the yard. We criticized the Swedish ambassador, at one point, since he twitted that "the PHP yard is a great dry-dock". There is no dry-dock. And never forget that there are European ships they are breaking and these European owners permit that the standards are not good enough, which would not be allowed in Europe.

Where are the facilities to recycle ships in Europe?

Mrs. J.R.: There are twenty facilities on the European List.

Appendix 17: interview with Mr. C.E.

The interview with Mr. C.E., the Former-head of the IMO's ship recycling section of the HKC and currently a cash-buyer of GMS, occurred on October 24, 2018 from 11am until 1pm in Bruges by skype conversation. I started the interview explaining the objective of my thesis and describing my fieldwork.

Mr. C.E.: Did you visit any yard?

Not yet. But I will try to do it.

Mr. C.E.: Of course, you will. Mr. R.M. will open any door you like. The SENSREC project is going on in Chittagong and Dhaka. In the meeting there were also many stakeholders from Europe, because they want to get a sound kind of external people who deal with storing and disposing waste.

It does not happen now.

Mr. C.E.: Not yet. They do give some training but the training they give is kind of superficial. It is the idea of the first stage of the SENSREC project. Have you read any of the reports we have made?

I have met some researchers and Mr. R.M., from the MoI, who gave me those reports.

Mr. C.E.: The economic report was much better than the environmental. It was not as good, even academically. They do not know what they are saying at the end of the day. There is another report, which is a kind of concluding report. It is a kind of a summary of each report. The last two items, which is the training requirements for the future and setting up the training, registration of the workers, so that the trained workers could be registered and be part of the data base that is held by the GoB. One day they can go to the yard and say: is everybody registered? Because not everybody registered is trained. There is some training material, which I believe still needs to be reviewed.

About the BC and the HKC...

Mr. C.E.: If you try to read the BC you will be kind of banging your head, because it is a difficult Convention to read. The language is not very clear. Very, very simply...BC is meant to control

the movement of hazardous materials, it is not meant to do anything about ships, it is not meant to do anything about yards, and the only thing out of BC that matters is just one very short phrase..."waste would be treated in an environmentally sound manner". That is all!

It is about the treatment of waste...

Mr. C.E.: It does not even say how to treat the waste; it talks over an environmental sound manner. The guidelines, which are not part of the legal text, are a kind of advisor. So, BC is a very... it is a political instrument. It deals with the export of waste. If you want to export from here to another country, it involves different governments, ministries. It involves the exporter and the importer. Between them, there is communication, paper work, which takes quite a lot of time. There is an agreement, where you know what you are doing. It is called Prior Inform Consent, a kind of the pillars of the BC. That is not a technical requirement, it does not tell you anything about scrapping ships. So, the HKC is a very different instrument, it is much more technical, and it has got guidelines, spells out a lot of information about the yards. The BC suffers from the fact there is not meant to be applied for ships. When it was developed, it was not created for ships. Even if you are only interested in the environmental side, there is anything to do about safety. Many workers are killed, because there are no cranes, and because, because, because...But the BC does not address that, what it does is that it looks into import and export of wastes. When it comes to ships...ships are not imported and exported, ships travel all the time. And ships are also under flag State jurisdiction. Whatever flag you have, that is to the responsible authority for the ship for issuing all the international certificates and so on...On the top of that, you have ports, which control ships who go to other country. That country has got the right to visit the ship and make sure that the certificates are accurate. Now, the BC does not work with that and that is why it is very awkward.

So, the HKC did appear to improve the BC?

Mr. C.E.: No, they are different things. When it comes to a ship, it does not fit because, first of all, ships are not exported from your country to my country. A ship can be in your country discharging cargo and then departs and comes to my country. How can you create enforcement or something which is very sophisticate...very awkward... you need a lot of time to communicate with the opposite ministry about a ship that is simply passing through your port? It is not even your own responsibility. So, the BC does not understand it because it has

not meant to be for ships. So, when they apply the Basel, they have a lot of legal problems. The trouble of the BC is very much supported by NGOs and the scholar civil society. It comes to the point of being blind. Now, the situation with the civil society and I should call them NGOs, and particularly the NGO who is dealing with ship recycling, is very unknowledgeable about the issue. It must get knowledge about it because it is dealing with it since 2006, when the Platform was created. But they have a kind of strict ideas that do not fit with the reality. They want to ban beaching and that is where everything starts and finishes in their mind. The fact that improvements take place, they ignore; the fact why ships are recycled they ignore, that China now close down, they ignore and now they are saying that ships must come to Europe. This is the most stupid thing.

The problem in Bangladesh is the way it happens, the working conditions and the environmental impacts...

Mr. C.E.: Let me interrupt you because I understand a little bit of a dilemma. The better example than Bangladesh is India. India, Pakistan and Bangladesh were a lit bit similar, but Bangladesh was probably the worst in terms of standards. India was probably better, and Pakistan was second. But there was no big difference. Now, since 2008, and in the last four to five years, the yards in India have really improved and upgraded. They have obtained voluntary statements of compliance in line with the HKC but also the Indian government picked up and started enforcing these standards. Now they have respected part of the requirements. India has about sixty-two yards upgraded and reached the HKC standards. In Bangladesh there is only one yard and then two yards are trying to improve. These are the kind of the yards that can bring the change. In India, five years ago, four yards started the improvement and received better money. They are buying ships cheaper because they have better standards.

A kind of advantage to incentive the improvement of the industry...

Mr. C.E.: Yes. Primarily, it was the Japanese ship owners, some of them are big companies, with hundreds of ships, they have a lot of public frontage, they do not want to be found on newspapers. Because of that, they recycled their ships in China, but five years ago they had a lot of problems. China was not recycling much; the price was dropped. Then, back in 1942, there were war Japanese ships. They tried to encourage India, and, at the same time, it was

the effort to bring movement, improvements in line with the HKC. Some of the Japanese companies were choosing very carefully the yards they were going. The improvements of standards are driven the change. A commercial benefit to the yards when they were upgraded. In Bangladesh you can see the beginning of it, you can go to the PHP yard...

Which stakeholders do you think are capable to make the change possible?

Mr. C.E.: It is a cheek on a neck, because if the yards do not change, the ship owners are not going to say what to do. The ship owner is not his business to improve the world or be a changer of international standards. He wants to get rent from the ship once each twenty-five years. Some ship owners do not care, and few others care, because of many reasons. Different ship companies have different motivations. Many say that they will subscribe for corporate social responsibility. They will do it at different degrees for different reasons. These owners, when they are going to find the yard with improved standards, they are going to sell the ship for less money than they would sell it if they sold it to a yard that does not care, for a number of reasons...one is a better job, invested in equipment, extra training for personal, they have to cut the ship more carefully and slower. All that cost money, specially the speed with which you finish the ship because you borrow that money and you pay interests. The yard owner only has it when they started selling the parts of that ship.

So, do you think the yard owners have the capacity to make the improvements by their own?

Mr. C.E.: They do have the capacity to improve, but you know...it is normal human nature. Human nature looks after number one. They are surrounded by very expensive cars, very expensive houses, a lot of servants without improving their yards. However, if they feel that their business is going to improve, or their business is going to suffer, they put their hand in their pockets and they invest. The PHP is a very good exception because the guy, the owner of PHP, is connected on a big way. It is a very big family with many companies. There are other big companies. There are some recyclers who leave from one day to the next, others who try to clean money, and there are others that have no problem. Now, in India seventy-two yards have already upgraded, which means that there is always money to upgrade but that has to make economic sense, you do not do it because of some other reason. And the economic sense is driven by the ship owners, demanding better standards. It is what I am talking about

in my article, it is what I am talking about, how this thing happens, who motivates whom. Ship owners really will be motivated by the HKC, if the regulation says you only recycle in this way, they will just do it. But when there is no such an obligation, then some will do it for marketing purposes, and others will not do it at all, and will get most money from the worst yards.

The GoB... do you think they can help in the process economically?

Mr. C.E.: In India, they do not have support, their support is totally apart, which has not yet happened. The Japanese government has offered soft loans to the Indian government. In my mind they have offered too much money. Unless you do some to the common interest, you build something for all the yards, a hospital, or a waste facility or a training centre, that would make sense but if the yards have the capacity to build their own infrastructures and they have done it, seventy-two yards have done it without government support. The local government in India has made a training centre with money collected from the ship recycling from many years and have built the centre, treatment storage disposal facility for waste and a small village for the workers. But if you go around in India, you have been around Bangladesh, I imagine, you see the poverty and how people live. So, ship recycling is not different, but because of the international focus, because, because, because...the things have improved and will improve in Bangladesh. Now, the GoB is a little bit, I think, weaker than the government in India but, through the first part of the SENSREC Project in Bangladesh, the greatest success is that the government got to understand the international pressure, the ship owners' position, things that most Ministries and government's officials in a country like Bangladesh would never be able to grasp. They came to conferences, I sent continue articles and things about what has been said about Bangladesh. So, Bangladesh has moved quite a lot because at least the Ministries' mind has moved a long way...

How did your involvement in the issue of the shipbreaking start?

Mr. C.E.: I used to work in the shipping industry for many years. I was working for a ship owner and then I was a consultant. I was included in the IMO as well which is the organization who created the HKC. I was the responsible for the development of the HKC. I kind of developed it. Not many countries participated but I made sure that it developed in the right way, I guided it. So, I looked after it. When I retired from the IMO, I enjoyed a cash buyer, who had already been engaged into the IMO's process by attending events and speaking in meetings we

organized. I enjoyed them as a consultant and what I achieved there was to get them to create an avenue to green recycling (or responsible recycling). Then the ship owners, who want to sell the ship for recycling, would have a contractually sound way through the major cash buyer to sell the ships and ensure that it goes to a certificate yard, with a contractual guaranty for that, have the ability to witness the recycling, with reports and so...

Do you see ship owners as one of the most powerful stakeholders in this issue?

Mr. C.E.: Well, most powerful...there are the most powerful and the weakest in the sense that the strength comes from being able to dictate. Now, if ship owners are left alone for thousands of years when it comes to scrapping ships, they look for the top dollar. So, nobody talks about this. The ship recycler is weak because he has all the costs and all the uncertainties because the market goes up for ships and down for steel. They are always in the middle of this dangerous bias of existence. The ship owner is the seller of the ship, who can, if convinced or obligated or encouraged, leave many on the table for the yard to improve. When the ship owner sells his ship is paying back by the yard, effectively. You can sell the ship and say in the contract that the cash buyer should send the ship to a yard with the proper standards. In this process, the cash buyer defines where he takes the ship, it is up to the cash buyer to decide. If the ship owner wants the recycling to be done slowly, carefully, with good cranes, enough people, with certificated wires, with, with, with... equals the HKC. If you want such a standard you cannot demand the same amount of money as you would from a yard with other standards. When the HKC would be in force, in the future, then nobody will question anything. Now it is still voluntarily, and it is moving towards. It creates certain dynamics. The cash buyer has to do with financial matters and not with standards, but the yard owners borrow money. The banks do not give them money, they give them a letter of credit. The cash buyer facilitates the process and knows the local markets, instead of the ship owners.

What would be the most difficulties to implement the SENSREC project in Bangladesh in the practice?

Mr. C.E.: The second phase is not dealing with waste; it deals with training issues. As far as I know, I was the manager of the first phase, but in this second phase I was not involved, I do not even know the project. The difficulty with the training is that there is training material, though I believe there is a lot of work to make good standards. Then you need some

hardware's, some school, some space, which have to be in accordance with the plan you have for many workers to train per year and how many years to do it. Everyone who works in the industry must be trained. That planning needs somebody quite strong in will and strong in deciding. For 40.000 workers, in 4 years, you need to train 10.000 workers a year. The cost is whatever it is for, two, three, five, six weeks long, how many costs you run in parallel, all this logistics. If you look at the reports on training, some purposes were made, but I do not know if whether the GoB and the IMO want now to water it down and make it simpler or make less. The second thing that is very important for them is to establish a register of trained workers that should not be run by the BSBRA, what should be a mistake, but by the GoB. Whoever is trained receive some kind of sticker or a plastic card. In Bangladesh there are people who does not have identity card, you know, so there are some practical problems.

What about the investment of the yard owners?

Mr. C.E.: The yard owners will invest when they are forced by circumstances and the ship owners will stop coming or they will only get bad ships, or the GoB will force them, but the government is not strong enough to do it. A lot of ship recyclers are very wealthy people, not all, a lot, but many and they are well-connected.

Why do you think the GoB is not strong enough to force them?

Mr. C.E.: The GoB has passed the law. Now, I believe that it will happen in a parallel movement in the industry. Like in India, when seventy-two yards out of hundred twenty have upgraded, it is so much easier for the government to say, from tomorrow you should have this. If nobody has done anything and the government starts saying something and nobody listens and does not do anything, then the government is embarrassed, they have laws that are not enforced.

The permission of land is given by the government to build a yard, which is not according to the law. Is this situation that has to be changed?

Mr. C.E.: That is part of the whole process. There are some kind of systematic ways: working, procedures, training, necessary equipment...they just do not take a bit of a land and start to break the ships. This is the way it has been done until now, so this kind of mentality has to be broken. The PHP yard is a big company compared to the others because they have done so much, but because PHP did a lot (more than they needed to do), the problem is that they

have created a big distance to the other yards. They have created the impression that upgrading is a very expensive business and no one can afford it, only the PHP family can afford it.

That creates competitiveness between the yard owners, no?

Mr. C.E.: Yes, that is the case of India. In India it was a momentum, in a very short time, they became five, then nine, and then the others thought...What is happening here? I am staying behind. In case of Bangladesh, you have the PHP that has been going so far away that the others think they are lost. But I have hope that it will be like in India. Bangladesh will find the way. And that is why I think the NGOs are doing such a bad job. They could be pushing and encouraging this, rewarding what PHP has done. Instead, they are attacking PHP. They are saying that PHP is green washing. It is not real. You should go there. Did you follow what did happen with the Greenpeace ship? Rainbow warrior ship was given from Greenpeace to a local NGO in Bangladesh. They used it as a hospital ship for seven years. This ship was sold to the PHP yard to be scrapped but, in secret, as a part of the contract. It is a very controversial case, also in the media. This shows the little brains they have because what matters here is to improve the yards, to improve safety and pollution prevention. What they say that matters are why to ban ship recycling and take it back to Europe.

Is dry-dock actually possible in South Asia?

Mr. C.E.: No way. It costs a lot of money. To deploy a dry-dock costs a lot of money, a lot, a lot...huge costs.

And the environmental impact of beaching...

Mr. C.E.: The environmental impact is what you make of it. In India you use to have the ship beached. Before being beached, the ship was washed on tanks, and all the oils came out. What it matters...I do not think there is any pollution. The NGOs support recycling in Turkey but in Turkey, the only difference is that they do not have tide. The ship still goes on the beach but there is no tide. That is the main difference. The ship still floats. The non-beaching of Turkey comes from politics, it is a non-OECD country and in the European Legislation you are allowed to export waste to OECD countries. The NGO-SP is being supporting Turkey ship recycling because they support the BC, as the regulation for ship recycling. What is the

difference? They still are grounding the ship against the soil as they are pulling up to cut it. The NGOs say the ship is grounded. So, what I suggest you do.... you go to YouTube and look at a very famous video of a ferry being beached in Turkey. It comes with a great speed and climes on the beach and comes with a big wave which washes everywhere and goes out. Look at that, it will tell you. It is only a political difference, I think.

Appendix 18: interview with Mrs. D.W.

The interview with Mrs. D.W., the Director for Maritime Safety and Environment of the ECSA, occurred on April 12, 2019 from 12pm until 1pm in Bruges by skype. The following questions were sent by e-mail to Mrs. D.W. in order to guide the interview.

- What is your role in the ECSA?
- Who do you think are the dominant stakeholders in the SRI in Bangladesh?
- In which way do you think the dominant stakeholders have been used politics (business, interest, ...) to influence the industry?
- In which way do you think this can influence the implementation of the HKC?
- How decisive are the dominant stakeholders for the sustainability of the industry?

Mrs. D.W.: The ECSA has no direct influence on the political level in Bangladesh. Our concern is that we have a global list of ship recycling facilities for our ship owners that meet or can guarantee that our ships will be dismantled in a safe and environmentally sound way. Whether it is in Bangladesh or India or Pakistan or China or Europe ... it does not matter. Now, one country will clearly have more work to do in comparison to another because it is not only about safe ship dismantling but about the entire industry. The ship owners can ensure that the ship is properly dismantled, but it does not lay in their power to provide hospitals, to the local people... that is not their core business. We think it is important that the government and the local government are also involved on this.

From the implementation of sustainable measures ...

Mrs. D.W.: The HKC in that case.

Does the ECSA represent the shipping companies in Europe?

Mrs. D.W.: We actually represent the national and the European member associations and the Nordic associations as well.

It is very interesting to know your opinion and different visions. Who do you think are the dominant stakeholders in Bangladesh?

Mrs. D.W.: They are currently at the political level for Bangladesh and, in any case, the EC is a dominant stakeholder. The European legislation has power to help or "push" Bangladesh to

upgrade the industry. Should the EC be able to cooperate with the government in Bangladesh, as we see in India, they can offer the facilities in third countries a perspective to recharge the European list. They can meet the criteria of the European legislation that will be included in the European list that would trigger a very positive movement, of course. At least, we see in India, we hear from our members "histories on the ground" that the establishments on the European list ... they want to dismantle European ships and that is a huge incentive. And the same can happen in Bangladesh. Of course, we know that Bangladesh needs to develop even more than India (India is already further). In that sense, even the EC can be an important stakeholder at the political level.

The Indian government is already working with the European Union?

Mrs. D.W.: Certain Indian facilities have applied for inclusion on the European List. The EC is now inspecting, and a number of shortcomings have been established, but the communication is there.

And not with Bangladesh? More at the IMO level?

Mrs. D.W.: Yes, not yet. In India we see, for example, that there are already good waste management facilities. There is already a group, a trade union active, it is more developed than the situation of the SRI in Bangladesh. In Bangladesh it is also more difficult to see the transparency that exists today in India. That is not yet in Bangladesh. But that does not mean it cannot happen.

Are you also involved in the SENSREC project?

Mrs D.W.: We follow it up. Bangladesh was the most important thing of course for us. We represent an industry. We try to use the limited power we have. Our members have no interest in a ship lying on a beach that it appears on the news where there are children working in such conditions. In India, progress has been going on for a long time. There are also many yards that, indeed, have a statement of compliance from the HKC. Japan has also invested a lot in India. The SRI in India is generally more advanced than in Bangladesh.

Japan's support does a lot for India. Norway has an important role in Bangladesh, right?

Mrs. D.W.: Norway provides funding to the IMO to implement the SENSREC Project in Bangladesh.

The EUSRR does not allow beaching.

Mrs. D.W.: What is beaching? It is not defined. It is important to understand. I will send you a video about the Turkish facilities, which was included in the European List. There is a film on internet that shows how the ship first lands and then it will be recycled in line with the European legislation. When you see, the ship sails, collides and lands slowly on the beach. So, is that beaching or how do you call it? In our eyes, beaching is just a beach where there are no facilities, where the workers have no protection. What we see in the Indian yards, and soon we will report our visit to the Indian yards. What we see there is totally similar of what happens in Turkey. Only the geography is different in India. In Turkey you have the sea going faster and deeper so that the ship is on the beach with its nose, which also floats with the start of the ship and also lies on the water.

In Bangladesh the ship lies on the beach ...

Mrs. D.W.: The HKC and the EUSRR deliberately do not focus or mention technology. They talk about beaching or landing or dry-dock recycling ... that is important. What is the difference? In Europe, the ship is dismantled while floating on the water. So, they start with the top of the ship while the ship lies along the dock. The difference lies in the minds of people whether it is on the beach or on the water. There is no difference. It can happen badly in both situations and also well in both situations. In China, ships are also being dismantled while on the water. That can happen perfectly in good conditions. You will not find any mention in international legislation of what is beaching, or what is dry-dock recycling or what is ... because it really does not matter. It is about the measures that you can take to recycle on a safe and environmental sound manner. Indeed ... the geography in Bangladesh is different than in India. The investments, the mindsets and training, etc., it can happen well. Of course, we talk about ships and ships have been on the water all their lives. It is a controversial debate when we hear from NGOs ... when the ships start recycling, they are no longer allowed to lie on the water. A ship is on the water all its life. You cannot just get a ship out of the water and lie on land, just like you do with a car, for example.

That is the purpose of a dry dock, isn't it?

Mrs. D.W.: With dry-dock we see that the business is not interested in ship recycling. They are interested in large offshore projects, windmill, ship repair. They do not offer their facilities

to recycle ships. It is of course not up to ship owners to set up the ship recycling facilities on the ground... we also do not request that we dismantle our vehicles and that they are environmentally friendly. For me that is a mistake to ask ship owners to develop an environmentally friendly SRI. That is not the business of the ship owners. The business is to operate ships or make them available to bring goods from A to B. We are, of course, concerned if the recycling of our ships would not take place properly. We make our commitment. However, we are not a government, we cannot implement legislation.

There are ships that use the EU facilities to have their ships recycled. Why are they still being dismantled in South Asia?

Mrs. D.W.: First of all, it is important to understand that the EUSRR has not come to regulate the European ship recycling industry. The European ship recycling industry was already regulated, which had to comply with certain conditions and legislation and with certain ship markets. They recycle ships yesterday, the day before yesterday, three years ago, which had a certain supply of ships that they recycled. The European ship recycling industry got there, but the EUSRR does not say that the Regulation was written for protectionism or that the EUSRR aims to provide the European ship recycling industry with more scrapping vessels. The EUSRR states that it serves to facilitate the international, the HKC. The objective is to pursue sustainable practices because the previous European legislation has not failed. European legislation was the European waste ship regulation, which limited the ship recycling market to European ship recycling facilities. As a result, many ships circumvented the legislation because it is unrealistic. Europe does not have a realistic market for recycling ships. So, if we want to change something about shipbreaking practices in third countries, we have to see that they are pulled into the boat in one way or another. We can develop a very strictly legislation, and then put our heads in the sand. But if we know that the legislation can be circumvented, that is not correct because it will not change anything in the practice. If we want to change those third country situations, we have to upgrade them. Only through international legislation and ultimately through the HKC to ensure that it is properly advised. Keeping the industry in Europe, what Europe tried for twenty to thirty years, we do not change anything. We have a new legislation (EUSRR) and the HKC that may be more successful because it involves third countries. In the minds of many people, the EUSRR serves to facilitate the HKC because the HKC is delaying or that we are now seeing that there is a momentum in

which more and more countries are getting ratified, but it is good that the EUSR was there. Policy makers should know that re-flagging is an option in the industry, whether they like it or not, re-flagging is a legal option. So, if you want to develop realistic legislation and you want to make sure that improvements have been made in third countries, you cannot ignore it because otherwise you will be doing nothing. You can only change anything through a global system that applies to all areas. For example, when a Belgian flagged ship is sold to an American, the American company has no link with Europe, then he has no longer the power to sail a European flag. Re-flagging happens for various reasons. And it is a reality and good legislation must take this into account. You cannot solve it, if you do not like re-flagging, you cannot solve it with the EUSR. Then we have to go somewhere else, at a different level.

Re-flagging has its origins in a free market?

Mrs. D.W.: To solve practical problems. You have a ship that operates worldwide, not just in Europe, but also in Asia. Sometimes it is easy to do business when the ship has a flag which gives you access abroad.

An unregulated industry... Is it due to a lack of regulation?

Mrs D.W.: Suppose that Bangladesh would ratify the HKC, it is indeed the weakness that Bangladesh itself is the competent authority, which must ensure that it is done properly. If a Belgian ship is being dismantled there and in Belgium, they know the dismantling is not done under sustainable conditions, then, Belgium, as a member, can raise an issue with the IMO. We see that a ship has been dismantled not in line with the standards of the HKC, so one country can order the other country diplomatically. The IMO has an audit mechanism. For example, Belgium could advise that in Bangladesh there are bad signals and ask for an audit. This is good. Of course, it is not because Bangladesh ratifies that they have a free line to make what they want. If you participate, you also have influence. If you do nothing, you have no influence, but nothing will change, in our eyes. So, it is double ... but no one can look into the future. We see that the HKC basically contains good elements to improve the situation. The ship recycling industry is regulated by the European and the national legislations, for example in Spain they have to comply with the European as well as with the European framework directive, national legislation, environment standards, etc. To be included in the European List the yards have to comply with strict European regulations. The EUSR is actually less strict

than the European legislation. The large sea ships cannot enter European ports because they cannot enter the ports, they are too large. Those ships do not operate in Europe themselves. We see the European yards, in the Netherlands, for example, where there is a large yard on the European list, but they do not attract ships to scrap, they are not interested in dry dock, because it is not profitable to them. Nowadays, we know about stories from shipowners calling European yards, and they either get no response or they are not interested.

While they are on the European List ...

Mrs. D.W.: Yes, while they are on the List. So, it is double. In particular, it is not a business case in Europe. You have to keep in mind that most of the ships are exported from Europe. The demand for steel in Europe is less than in emerging countries. All of this plays a role in the entire drive of the market. Bangladesh also relies heavily on steel from the ship recycling industry. Then you may reflect on if it is more sustainable to guarantee the economic impact of the market in developing countries, as long as the ecological and social standards are upgraded ... that is sustainable development, ecology, upgrading social standards and economic impact for the region. It makes no sense to say ... jobs and wealth in Europe and the rest ... it is also important that we create safer jobs in developing countries ... otherwise that is not sustainable development.

What kind of political dynamics do you think have an impact on the current situation in the SRI in Bangladesh?

Mrs. D.W.: Many years ago, the BC and the European waste shipment regulation used to be confirmed on the export of ships, but I think that, at some point in the 2000s, the world, as a whole, had to admit that sustainable practices were not present, even though Basel forbids the unsustainable situations. We are powerless and then, under the BC, the countries have decided that they cannot regulate this because they have no impact on flag-states, for example. The flag-states are so important on the export of ships. The BC is the environmental branch of the UN, while the IMO is the maritime branch of the UN. Then the IMO wanted to improve the situation. The environmental awareness has grown. And the European ship owners, who have a high environmental awareness and a corporate social responsibility in their policy, no longer want their ships to be dismantled in such unsustainable facilities. Firstly, what the HKC wanted was an upgrade of sustained practices. That was necessary, it

was not necessary to regulate European or Western industry, that was already okay. What the HKC did not want was to distinguish the yards. We must first guarantee the sustained practices and then step by step go forward. It was important to look at the possibilities that can be prepared in third countries with a certain awareness of the reality.

But they continue to recycle their ships there...

Mrs. D.W.: Of course, if a ship is sold, that happens through a business model. We cannot change the business model overnight. Basically, it is for European ship owners ... it does not really matter if we get \$500 per ton for a ship or \$20 or \$300 as long as our Chinese competitor or American competitor also gets the same amount. We have to take that into account, otherwise the European business will simply be broken.

It depends of the market. The market regulates it, right?

Mrs. D.W.: Yes, we have to take that into account. That is why we are always in favour of an international solution because it applies to all ships. And not only to the European. Otherwise we are placed in a serious competitive disadvantage and then you can no longer regulate that.

So, to have a ship recycled in Europe, it is not financially advantageous ...

Mrs. D.W.: No, no. We may have to pay to have our ships recycled. Our most competitors may receive \$500 per ton. It is about eight million dollars per demolition you get. That is not possible ... it is unrealistic to think that it will happen. Then, tomorrow the European shipping industry is bankrupt. If it happens, you also have nothing to say about recycling. In that way, Europe can no longer demand the IMO for better legislation. We no longer have a flag. If you do not have a flag, you are no longer a member state.

What about the role of cash-buyers and NGOs?

Mrs. D.W.: About cash buyers, I think it is best to ask them what their role is. Personally, I think NGOs have played an important role. In the future I also see that they are the "watch dogs" on the spot. They are at the local level to signal the Member States if something is not going on the right way. About cash-buyers...what we hear from national member associations is that some shipowners, and especially European ship owners, would have more advantage to work safely without a cash buyer but now the cash buyer also deserves a piece of their

ship. If the guarantee of good practices could be given by the European List, we know that many ship owners would be willing to work directly with the facilities without the cash-buyers, what is good for transparency. There would be many benefits. The HKC facilitates this process because it is more realistic to leave the cash-buyers in between. Now it is very difficult because, and certainly in Bangladesh, it is not always easy to make a safe transaction to a Western company. In my perspective, what the NGO-SP wants is not entirely clear. They say what they do not want, but they do not offer a solution. Europe has been trying to keep the industry in Europe for twenty to thirty years, with the BC and yet we see unsustainable practices in Bangladesh, in India... Then, this is not the solution. As long as it is also possible to re-flagging, regional legislation will not solve anything. It really requires international legislation. It is also not just the case for ship recycling.

The impacts in the SRI are very visual as well ...

Mrs. D.W.: It is a simple solution for a complex problem. That does not exist. Sometimes I think that for the NGO-SP it is very “black and white” and it seems very simple, but it is a complex problem and you cannot solve it with simple solutions.

Appendix 19: interview with Mr. L.M.

The interview with Mr. L.M., the Policy Advisor for the Green Group, happened on April 21, 2019 from 2pm until 2:30pm by phone. The following questions were sent by e-mail to Mr. L.M. in order to guide the interview.

- What is your role in the Green Group and in the European Parliament?
- Who do you think are the dominant stakeholders in the SRI in Bangladesh?
- In which way do you think the dominant stakeholders have been used politics to influence the industry?
- In which way do you think this can influence the implementation of the HKC?
- How decisive are the dominant stakeholders for the sustainability of the industry?

I am an advisor to the Green Group. I am working for the Greens as a whole but, in particular, for the Greens in the environmental Committee on issues related to waste and health. I am in that role since 2001. Before that, I did work for five years for Greenpeace. Already at that time we were aware of the problem of shipbreaking and what to do about it.

Greenpeace was one of the first NGOs dealing with this issue, no?

Mr. L.M.: I think so. The Shipbreaking Platform was created afterwards. Because Greenpeace was definitely the first, and actually the only NGO working on the BC. I was actually hired in 1996 to make sure that the EU properly implement the Basel Ban, that was adopted in 1995. So, in that sense, waste shipment issues go. Basically, it is the reason why I am here in Brussels. I was attending the technical meetings of the BC. In several occasions, I also headed the delegation of Greenpeace. I mean, there were discussion about other issues, as well such as the implementation of the BC and so forth, the listing of hazardous waste, ...and all these things. So, the shipbreaking was not discussed in that context, but of course shipbreaking as discussed as a whole. Actually, it is clear that a ship has to be scrapped, it is waste. Therefore, it would fall under the BC Ban because basically any ship has its various components on board. The problem was that it could circumvent the definition of waste because no one knew when someone wanted to discard it. So, it was rather an exception, of someone was stupid enough to make a contract with a cash buyer outside the EU to sell the ship. One could say you are trying to ride out of waste in that country. But my work is that of a political advisor, but more easily, I am basically doing the legal work, I will be the one who is formulating the

amendments, I will be sitting in the negotiations, I will be trying to find out compromises. Actually, when the EC made the proposal for the revision of the EUSRR, it was a Swedish Green Member of the European Parliament, who was appointed as a rapporteur, and then I did the key work for him. Of course, he was the one who was leading the political negotiations, but someone had to draft the texts and negotiate at staff level and so forth... That it was what I did.

So, Greenpeace was the only NGO who made part of the negotiations...

Mr. L.M.: If you think about the BC, at least...then in the 90s. I joined Greenpeace in 1996. At that time, the Basel Ban was already adopted, and Greenpeace was active about shipment issues, throughout the all 90s, maybe end of the 80s...I am not so sure. When I went to the meetings of the BC, it was the only NGO who was present. So, there was nobody else present in that sense. Of course, I have a strong loyalty to the Basel Ban and the idea behind it...that the waste from OECD countries should not be shipped to non-OECD countries and, in that sense. Unfortunately, it was a real difficult concession to make that, for ships, this cannot be enforced. Normally, someone generates waste...you have industries and then the waste is generated on side and the waste you try to ship it and it is clear. The waste is there and that is not the same with a ship. Actually, I was getting in quite some conflict, with the people who hired earlier from Greenpeace, now working for the Greens. To say... look, I think we tried to implement the Basel Ban for ships for many, many years, for decades, and failed. So, we have to take a different approach, that was the one proposed by the EC. If in some countries, they fulfil some requirements they can also send the EU ships to those countries. Mr. C.E. is the absolute primordial person in all of this. There was a visit to China, and we visited several sites in China, there was shipbreaking and, of course, there was the discussion about beaching or no beaching. It is clear that the HKC, unfortunately, allows beaching and that, however, it is totally unthinkable to use that technology in the EU to break a ship. It was already, let's say, a big jump to say instead of requiring the ships get dismantled here (it is what it should be if we follow the Basel Ban). Ok, we accept that they are sent to another country but then, of course, under proper conditions. And the conditions that which are broadly equivalent to our conditions that, certainly, cannot be on a beach. That would be 100% illegal here. So, that was, of course, the fight and has been the fight for all these years.

Mr. L.M.: When I am looking into your questions...what I think...I have a shallow understand of the situation in Bangladesh, but what happened, on a meeting here, which was organized by C.E. and the owner of the PHP...and he came to see one of my members, the Head of the Delegation of Southeast Asia, included Bangladesh. He was trying to charm her, let's say, with the lovely work they do in Bangladesh and trying to explain to her how the EUSRR could really undermine the work there. I had a quite controversial discussion with C.E. during that meeting, because he knows his stuff inside out, he knows well that what we adopted in the EUSRR means no facilities can be offered to dismantle a ship on a beach. Of course, the Indian, the Bangladeshi yards they can take apart other ships from other countries on the beach, that is outside our jurisdiction. But the way we drafted the EUSRR...sorry this is not possible. But since he has been...he comes from the other side, actually, of course, he worked for the IMO for many years and he knew the situation on the ground and he was just thinking we have to give some work to these poor people and let's improve the working conditions a little bit.

Yes, that is very important to the economy, but then you have the other side...

Mr. L.M.: So, I can understand that but, at the other side, it is not thinkable the way the European Union export the ships, while it can treat themselves, to facilities that are absolutely unacceptable here...then, of course, the change of C.E. from the IMO to the biggest cash buyer, the GMS. He has an immediate financial interest in maintaining beaching because that has the lowest costs and therefore the biggest benefits. I mean it is an absurd situation. It is crude that the poorest countries with the lowest standards can pay the highest prices. That is a completely externalization of the costs. What we should see, it is protecting the environment. As far as I understand I think the dominant stakeholders in Bangladesh is the PHP yard, I think they have been very much influenced, (but, of course, why influenced?) it is still hand in hand, in their interests, the interest of the GMS and so on...they and C.E. were hand on hand on this. The version we have negotiated was the English one but there were other language versions which were different in the sense that one could have read them in such a way primary cutting could also take place in the intertidal zone which, of course, is not what we did try to allow. He mobilized the Representative of Belgium, who is now going to ECSA, she tries together with the Greek guy encourage to change a several language versions so that also the primary cutting could take place in the intertidal zone, but we refused that.

Mr. L.M.: With regard about the influence on the implementation of the HKC... well, I have not taking part in any discussion or meetings of the BC for 20 years now, so, I do not know what the latest is there. But in a way, I think the BC is no longer relevant. I mean the EUSRR should enter into force. Therefore, the BC is really no longer relevant here. Relating to the ratification of the HKC... we always have to pronounce ourselves in the ratification of the HKC whether we would support it or not. The Parliament was consulted on that, we say it is ok... why not? But clearly understanding that it is only a standard that can be relevant for third countries to third country ships and not a standard which can be acceptable for EU ships and in the EUSRR we clearly established higher standards. We said so in the draft reports, at the Parliament, at the time, we have made a summary of the elements why breaking a ship apart on a beach is not acceptable under the EUSRR.

Mr. L.M.: The dominant stakeholders...behind PHP, is C.E. His influence is huge. Absolutely massive. And is totally against the sustainability of the industry. It is just the financial sustainability of the business and of green washing at a little bit and continuing to exploit the ingredient in terms of costs; the greener they would become in Bangladesh, the more environmental standards they would respect better they will pay their people, the more working protection would they have, the less money they could pay, the less money GMS would make. So, GMS by definition does not have any interest ...what I would understand for proper shipbreaking.

PHP and Mr. C.E. ...they are probably the most dominant stakeholders for you, then? What do you think about the GoB?

Mr. L.M.: From what I understand, I am not really familiar with the situation on the ground...you better speak with Mrs. J.R. and others, who have been in Bangladesh. I can only explain what happens here at the European level and the policy making, and the treat they were trying to pull, and they were trying to say let's come up with...because Maersk was amongst the first who noticed it. Initially, they were the ones who went to China and India and then they realized they were losing a lot of money and they were trying to green-wash the work in India.

What about politics of business and interest... the dominant stakeholders have created their own politics to sustain this situation?

Mr. L.M.: I mean the all model of cash buyer, of course, is someone who is buying something, so the companies who own the ship do not worry about it, they just get a good price and that is it. Then, of course, the cash buyer tries to sell it and they make their money on the difference between the money they pay for it and what they sell it for. So, the more the difference is between the standards, the more money they make. It is a very crude business.

How do the ship companies will respect the EUSRR?

Mr. L.M.: In the past we were in a situation that the companies, because there was no specific law, it was certainly unlawful when they knew when the ship was within Europe...they will say ... I really will to discard this ship and sell it to a cash buyer in India, for example. It was unlawful because it was difficult to find out about it, they got around it.

There was no regulation at that time...

Mr. L.M.: Exactly, but now there is a specific regulation with specific leases, such ships can only go to proper facilities, of course, the easy way out for those is to flag out. This ship business is, of course, totally corrupt. It is why we are environmentally arguing for a financial instrument that would affect everyone who is coming to the European Union so that you have money available that this perverse incentive is no longer there to go to the ones with the worst conditions have the best price. Basically, you have paid your dues as a ship owner over a time and then you can go to a proper site and those sites can then pay more or could pay as much as Bangladesh could pay because they would get subsidies from that fund. So, basically level out of these perverse centres. There is a big study that was done by the EC on this and it found that, because there are different models to do that, at that time we were dealing with that thought of adding something to the harbour fees...anyway any ship going to a harbour has to pay a fee...and then you could collect it as part of that. We were unfortunately lost, narrowly and plenary at the time...we could not run with that. We reviewed the clause and based on this reviewed clause the study was made and that one is more like a vignette type of approach that you want to go into European harbours you have to pay ...let`s say...like a vignette, then you can go anywhere and that money is paid by that

pot and can be used to compensate or to finance, to make shipbreaking under environmentally sound condition competitive with the non-sustainable options.

Appendix 20: focus group with workers of the SRI in Bangladesh

On September 20, 2018 together with Mr. J.K., the co-research assistant, a meeting was organised with a group of about twenty workers at the YPSA office, in South Sonaye Chore, in Sitakunda. During the meeting, the demands of the workers are referred as: the need of an identification card; a contract; correct safety equipment; a better salary adjusted to the weight of their work; and a restroom where they can rest properly during the break periods. They also refer that when the DoE calls to the yard and informs about an inspection, all workers are provided with PPE. In the group discussion they told as well that in the shipbreaking there are two kinds of work: in the ship as a cutter and on the field as a helper. In the ship, each cutter should have three helpers, but they only have two. For them this is very important because it is much safer when the cutter is cutting the ship. In general, they have about back pain and thoracic pain during the work and in rest. About the night shift, which they say is illegal, the workers think that it is better because they do not work during the warm temperatures, though, there is no safety at all working at night because the place is not sufficient illuminated. About the personal expenses in one month, they spend about 5000 taka for a small place to live and 10.000 taka for a place for a family. The workers interviewed do not have contact with trade unions. Mr. J.K. said that in this area there is no active trade union.

In this focus group, there was the opportunity to individually interview seven workers.

Mr. I. R is 26 years old and works in the shipbreaking since he was 18. Nowadays, he works in the KSRM yard and receives 5000-6000 taka each fifteen days or about 12.000 taka in one month and he is paid by hour. He is a cutter and works in the night shift from 8pm-8am for about twenty days a month due to the physical condition that the work requires. He studied until class eight and he came from South of Bangladesh because his family worked in Sitakunda. He is not married and lives in a bachelor, which he shares with other workers. Regarding to the use of PPE he only uses a helmet. He has access to water in the yard, but it is no drinking water. No other facilities are provided from the yard owner. He has got injured with small injuries and a paramedic of the yard made the treatments. The advantage of working in the shipbreaking is that he knows he always will get money instead of what

happens in other jobs. But if he could choose, he would leave this job because of the high risks he is exposed.

Mr. U. M. is 48 years old. He started working in the industry in 1985 and this until 1998. Afterwards he worked in other industries and nowadays he has a small shop in the village. He is also the person who represents the workers. This group is composed by about six hundred workers. The objective of the organization is to unify and mobilize the workers. The official number when the organization was founded were about three thousand and the official President is Mr. M.F., the research assistant, if there is any problem, Mr. J.K., the co-research assistant, is the contact person, who will inform Mr. M.F., who, in turn, informs the DIFE.

Md A. is 17 years old and works, since he was 15, in the shipbreaking as a helper. He works in the M. yard and receives his wage per hour. He works during the day from 8am-8pm. His wage is about 3000 taka for ten days. He studied until class five. He came with his family from the Southern part of Bangladesh. They are five people at home and his father works in the jute mills industry. In the future he does not want to go to school because he says that if he works, he gets money directly.

Md. I.H. is 24 years old and he is working in the shipbreaking for about four years. For the last six months he is working in the PHP yard. He does not have a contract and he has paid by hour. He is a cutter and receives about 41 taka per hour. In this yard he gets all equipment he needs, contrary of other yards, and the workers get each year one-month training. The yard owners also provide drinking water and accommodation. His family has 6 members. His brother works in the shipbreaking as well. He studied until class five, but he left because his family needed financial support. Once, he had an accident, an iron plate fell on his foot, and he was transported by car to the BSBRA Hospital. The PHP yard has permanently a doctor. Mr. J.K., the co-research assistant, says that if the workers go to the BSBRA hospital the NGOs do not have access to the data instead of what would happen in a government hospital.

Mr. A.M. is 35 years old and has worked for fifteen years in the shipbreaking. He stopped working two years ago when he got serious injured during his job in a yard. A big iron plate fell on his back and feet. He was transported with the ambulance to the Chittagong Medical

Hospital and stayed at the hospital. He had fractures on both of the legs. The yard owner paid the half of the treatment and two months of salary corresponding to eight hours a day – an amount of 16.000 taka. The rest of the treatment was paid with the help of friends and of YPSA. Now he works as a security guard at night because he cannot do heavy work anymore. In that shipbreaking yard the workers get three days training but in a group of fifteen cutters, only three get training. This happened seven years ago.

Mr. J.L. is 30 years old and works in the shipbreaking industry since he was fifteen. Due to financial problems, J.L. and his family came from the South of Bangladesh and he decided to work in the yards. He works, at the moment, as a cutter in a shipbreaking yard and just gets a helmet as PPE. He receives 50 taka an hour, which he considers not enough for the job he does. He works in the night shift for about twelve hours, from 8pm-8am, an average of twenty-two days a month. He has a son and if tells if he gets an opportunity to change the job, he will do it. About ten years ago, he got a burn injury in his left arm and neck and was treated by a paramedic in the yard, but he did not go to the hospital.

Mr. A.R. is 30 years old and is working for seven years in the shipbreaking. He came from the Southern part of the country with his parents. Now he has two children, who go to school. He worked, two years ago, in the PHP yard but now he works in the jute mills industry. He was a helper in the yard and received about 10.500 taka for 350 hours a month, 30 taka each hour. He will return to the shipbreaking because his work in the jute mills is temporary. He does not have a contract.

Appendix 21: participant observation in a shipbreaking yard in Chittagong

This participant observation was an unexpected meeting on September 11, 2018 at 2:30pm. Mr. Z.S. and Mr. R.S. and me were received by the yard owner and his son. They are normally invited to this kind of meetings. They were invited by the yard owner. The occasion happened because of the arrival of a new ship from Taiwan. This kind of meetings, according to Mr. R.S., happens when a new ship comes, and the yard owners invite some people to enjoy them in these occasions. During the journey to the yard, Mr. R.S. told that the day before (September 10, 2018) two German freelancers tried to enter the yards in Sitakunda with a local to take pictures of the yards without permission. They called the police and the local fixer has taken to the police station.

When we arrive at the yard, the yard owner's son even called Mr. R.S. of "uncle". Government officials, the Police Inspector, local media, business and financial men were present at the meeting. They seem to have a good relationship with the yard owners. According to the yard owner, there were about 1500 workers working in ten ships in that yard. He said he provides the workers technical training of 3 months, 1 month or less, according to their function at the yard. "It's a government rule." – he emphasized. When I asked him about the accidents, he said they does not happen frequently nowadays. When there is an accident, he should pay "*a lot of money for the compensation*". I asked for permission to take some pictures, which he did not appreciate. He said: "*It is a difficult question. Normally we do not give permission to take pictures, but we honour you and I will give you permission. But no videos, please*". Later when I was taking more pictures, he asked me again: "*Please do not take videos*". From the terrace of the office of the shipbreaking yard it was possible to see around seven large ships. We take lunch in the office as well and during the meal I remember I felt a kind of turbulence what it could be comparable to an earthquake feeling. Mr. R.S. said that was a big plate who was dismantled from the ship.

During the meeting, I had the opportunity to talk with the son of the yard owner as well. He studied and lived abroad, in the United Kingdom and Singapore. He studied Business and Financial Management and his intention is to follow his father's business. For one year he is working with his father in the shipbreaking yards. He often visits the ships inside to control how the works are going. As I heard from other stakeholder, there is a new and second

generation in the shipbreaking business who can be seen as a great and positive future promise to reach the certificate of “green industry” such as the PHP yard has done. When I asked the son’s yard owner about the technical training, he said it takes about 7-9 days instead of what his father said answering the same question. The son was also very enthusiast about the PHP yard. He encouraged me to visit the yard. He considers PHP as an example to follow and he wants to use a technique like they use, not dropping the metals into the sea. All metals remain in the ship. When I asked why the PHP yard have developed so much in comparison to the others, he told me about the factor of investment capacity as the main reason.

Appendix 22: participant observation during a meeting at YPSA's office in Sitakunda

The meeting happened at the local office of YPSA in the workers 'village on September 14, 2018. The NGO "BHRA" has visited Chittagong and the shipbreaking area for the first time. Firstly, a group of workers at the YPSA office talked about the problems they face and what they try to do to change them. The goal of this group of workers is to raise their voice in order to make pressure to the yard owners in getting the facilities that are lacking. There are around 3000 members with a corporate character. Each of these members pay an amount of 200 taka a month in order to have a saving account, helping to raise their voice and to be supported in the future. The problem of this association is the non-permanence of some members because there are workers who cannot long deal with the heavy work and leave. The fact the workers do not have a written agreement letter was talked in this meeting as well as that it means that the shipbreaking workers are not recognized as workers. They fight for a fixing wage with a month equal salary. When there is an accident, the workers told that there is often no ambulance. They do not get the correct emergency support in case of accident and, in a lot of cases, it could save lives, they told. Frequently they are transported to the hospital in a CNG¹⁷ but the yard owners are supposed to give appropriate emergency transport to the workers. They also do not get properly hospital facilities. The BSBRA have built a hospital to attend injured workers in the yards, but this hospital has been bought by a private investor. It is now a professional clinic. In this meeting it was also talked about the informality of shipbreaking sector despite shipbreaking is recognized as an industry, not being treated as such. In the shipbreaking yards the employers want to give the job to a male and young people preferably without children as well as people without schooling. The members of the NGOs add that this fact shows that it is easy to explore this sector of the population. Someone from the NGO-BHRA said that in the mentality in Bangladesh prevails a huge "private accumulation". A worker from the PHP said that in safety issues this yard is better than others. When BHRA asked if they want shipbreaking to end in Chittagong, they said they do not want because it brings job and a source of income for them and a lot of people, however, the safety conditions could be much better. It could also be much better organized with a treatment plan of the hazardous materials.

¹⁷ CNG means compressed natural gas and is a common form of urban transport. It is known as an auto rickshaw in Bangladesh.

Appendix 23: participant observation in a fishing community in Chittagong

The visit to a fishing village in Sitakunda occurred on September 20, 2018 with Mr. J.K. Near the village a yard was constructed seven years ago. One of the fishermen was 65 years old and he is working for the last 55 years as fisherman. He uses traditional fishing techniques and he told us that shipbreaking brought a lot of changes in the surroundings. He said: *“go inside the forest and you can see with your own eyes, it is oil damaging the forest”*. He said as well that sometimes cows die because of the damaged products they find and eat in the forest. He should go about three to five km from the coast to fish and he mentioned that the fish diversity has diminishing a lot on the last ten years. He emphasizes: *“Ten years ago I had a golden life”* and now it has changed. They tell us that, sometimes, the nets are damaged and cut because of the structures of the ships that remain under the water. After we talked to the fisherman, we walked around the village. Mr. J.K. spoke with many members of the village, who came to him and expressed their concern about the problems they are facing with the presence of the shipbreaking yard near the village. Mr. J.K. is a reference person of YPSA in this village.

Appendix 24: participant observation in the shipbreaking yards in Chittagong

With the authorization letter from the MoI to visit the shipbreaking yards in Chittagong and after sending e-mails to Mr. R.M., the Deputy Secretary of the MoI, for several times confirming my trip to Chittagong and trying to ask how the visit could be organised, I faced a lot of challenges. Once I was in Bangladesh, I have made the contacts directly with the Secretary of the BSBRA's President. After some contacts, Saturday 12, 2019 I went at 12am with the Mr. Secretary to the office of the BSBRA President and talk with the President's son. When we arrive, we went to the office of the President and I saw an interesting picture of Sheik Hassina, the Bangladeshi prime-minister, with the President of the BSBRA. Because the English of the President is not fluent, I talked with the President's son. He asked me to explain the reasons of my visit to the yards and my queries as well as why I have chosen Bangladesh for my research and not India or Pakistan. He started to talk about some general aspects of the SRI in Bangladesh. About 70% of steel is obtained from the SRI and 30% is imported. The vessel, before being imported and enter into the Chittagong Port, is properly checked and the waste management is done in a practical way. It means that the waste is burned. There is an Environmental Certificate to be respected. The IMO-NORAD-SENSREC Project involves the MoI and the Ministry of Environment, added the President's son. Nowadays, there are about 160 yards, which 60 are active. The workers are skilled ("they are very skilled") and get special training. The technology of cutting is very similar with India and with other places in the world, just the place where it is done is different. In each yard there are about 500-600 workers. The President's son emphasized that the owners have to pay fees and taxes in advance to the GoB. He told me about the BSBRA hospital, which the BSBRA constructed to give medical support to the workers in the shipbreaking yards. He added that every yard has one doctor, who treat small injuries. About his position about the NGOs, he believes that they have to learn first and then comment. They bring a negative image to the industry, according to the President's son. After this conversation, the President of the BSBRA and his son authorized my visit to the shipbreaking yards and started to make some calls. After that, the Secretary of the BSBRA's President would be the person with whom I should plan the visit.

The visit to the shipbreaking yards happened the same day, and we visited two yards. Each visit took no more than one hour. The first yard we have visited was the yard of the BSBRA President's family. It is a new yard from 2018 and has about 150 workers. The workers receive

about 600-1500 taka (In my fieldnotes it is not clear if it is per day or per week) according to the work category. They work from 7am to 6pm. We went around the yard where I could take some pictures. The workers wore helmets but a lot of them had no appropriate shoes, masks or even gloves. The place where the waste was stored seemed to be very old. It was locked, so I have asked to open it, but Mr. Secretary interposed saying we did not have much time. During the visit Mr. Secretary referred that China breaks their own ships and because of stricter measures in waste management they stopped to import vessels to recycle. "It is positive for Bangladesh", he said. Mr. Secretary added that Bangladesh imports about 250 ships a year.

In the second yard we visited, we were received by the son of the yard owner. Coincidentally, it was the same man I had talked with during the participant observation on September 11, 2018, the son of the yard owner. He told that about 150 workers work in the yard. The workers are now dismantling 2 ships, one big ship arrived recently. He told me about the improvements that are expected to happen in the shipbreaking as well. The yard owner's son said: "If you come in 2 years, you will see the difference". He added that the day after a German consultant was coming to help the shipbreaking yard to implement the necessary measures to achieve the certification of the HKC. The yard owner' son said that the company Green Tach, the BSBRA and AHL are responsible for the workers' training program. The visit had to finish, and we must leave. Mr. Secretary said he would let me know that same day in the evening about the planning of the visit to the next day.

The day after, the 13th of January, so as agreed, I called to Mr. Secretary to plan the visit to other yards because I did not receive an e-mail or a call. I tried to contact him by phone but without success. I have also informed Mr. R.M., from the Mol, about this situation. After some time, I received an answer to the e-mails, and I explained to Mr. R.M. the situation. I asked to Mr. R.M. if it would be possible to contact the PHP family because I did not have much time. However, the PHP family was abroad, and nobody who could talk to me was in Chittagong.

Appendix 25: Pictures



Picture 1- Old pictures of the SRI in Bangladesh, September 14, 2018.



Picture 2- Pictures of the SRI in Bangladesh, September 14, 2018.



Picture 3- Pictures of the SRI in Chittagong, September 14, 2018.



Picture 4- Sight from a fishing community in Sitakunda, September 20, 2018.



Picture 5- A fisherman in a village in Sitakunda, September 20, 2018.



Picture 6- A beach in Sitakunda, September 20, 2018.



Picture 7- Sight of a shipbreaking yard in Chittagong, January 12, 2019.



Picture 8- Reference to child labour in a shipbreaking yard in Chittagong, January 12, 2019.



Picture 9- In the entrance of a shipbreaking yard in Chittagong, January 12, 2019.



Picture 10- In a shipbreaking yard in Chittagong, January 12, 2019



Picture 11- Workers in a shipbreaking yard in Chittagong, January 12, 2019.



Picture 12- PPE room in a shipbreaking yard in Chittagong, January 12, 2019.



Picture 13- Workers in a shipbreaking yard in Chittagong, January 12, 2019.