

OUR OCEANS COMMITTEE NEWSLETTER

Fall 2025

Our Oceans Committee is thrilled to release its first newsletter to the Maritime Law Association membership.

Against the backdrop of the MLA's long history - founded in 1899 - this committee is one of its newest additions. In 2020, the MLA leadership reorganized the former Marine Ecology Committee, which had focused primarily on environmental crimes, into two separate committees: the Marine Pollution and Maritime Crimes Committee, and Our Oceans Committee. The Marine Pollution and Maritime Crimes Committee addresses liabilities arising from damage to the environment, while Our Oceans Committee will focus on ecology and sustainability. Its specific mission is to monitor and report on ocean resources and their economic, environmental, sustainable, and competing uses. The committee tracks international and U.S. oceans policy developments in legal, scientific, environmental, and commercial areas. This is a broad and timely mandate considering the global push for a more sustainable shipping industry and the challenges posed by climate change worldwide.

In this first newsletter, we will highlight two topics: **the entry into force of the Hong Kong Convention for the Safe and Environmentally Sound Recycling of Ships, and the United Nations Ocean Conference held in June in Nice, France.**

Committee Update

The Committee congratulates the MLA for a very successful meeting in Washington, DC in October. Our Oceans and the Salvage committees held a joint meeting on the topic of lost containers at sea and the challenges from an environmental, legal and recovery perspective. We were very fortunate to have Crystal Kennedy, General Counsel of Zim Integrated Shipping Services, Mauricio Garrido, President of T&T Salvage and Greg Challenger, President of Polaris Applied Sciences, provide their invaluable insights on such an important topic. We also warmly thank Benjamin Robinson, Chair of the Salvage committee, for moderating the panel.

Finally, we are happy to have Cassandra Hemmer of Montgomery McCracken Walker & Rhoads LLP as our new YLC Liaison. Welcome aboard Cassie!



⚓ From Rust to Regulation: Global Ship Recycling Goes Green(er) in 2025

On June 26, 2025, the **Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships (“HKC”)** took effect. Twenty-four countries are now parties to the HKC, including the four major recycling nations—Bangladesh, India, Pakistan, and Turkey—as well as key flag states such as Liberia, Malta, the Marshall Islands, and Panama. This milestone marks the first time that legally binding global standards will apply to the end-of-life dismantling of ships, aiming to address longstanding environmental and labor concerns in recycling practices.

A New Lifecycle Standard for Ships

All ships of at least 500 GT engaged in international trade and flying the flag of an HKC party must now carry a Certificate on Inventory of Hazardous Materials (“IHM”). Vessels already trading in the European Union will likely be familiar with the IHM, already required under the EU’s Ship Recycling Regulation. The IHM must list, at a minimum, hazardous materials such as asbestos, cadmium, lead, mercury, and radioactive substances, among others, and identify their location and quantities within the ship’s structure and equipment. Vessels will be required to keep their IHM updated throughout their lifecycle, subject to a series of surveys.

The HKC also prohibits or restricts the installation and use of certain hazardous materials, such as asbestos, ozone-depleting substances, and certain anti-fouling compounds and systems.

Ships covered under the HKC must be recycled at authorized Ship Recycling Facilities, and the IMO will provide a list of such facilities. At the end of the vessel’s operational life, the flag state will issue an International Ready for Recycling Certificate after a final survey is completed and the intended recycling facility has issued a ship-specific Ship Recycling Plan.

Compliance Requirements for Ship Recycling Facilities

Starting June 26, 2025, only HKC-authorized yards may dismantle vessels from flag authorities that are parties to the HKC. These facilities must submit a Ship Recycling Facility Plan (SRFP) and implement specific worker protection and environmental safeguards. The IMO guidelines on the SRFP (Resolution MEPC.210(63)) are extensive, covering facility management procedures, worker safety such as safe-entry or hot-work procedures, hazardous waste management (asbestos, PCBs, paints, etc.), and prevention of spills and pollution.

Enforcement of the IMO guidelines and regulations will be handled by relevant national or local environmental, labor, health, and safety authorities.

Classification societies will issue Statements of Compliance to Ship Recycling Facilities and conduct periodic audits. For example, approximately 115 of India’s 130 ship recycling yards are HKC-compliant. A few Bangladeshi and Turkish shipyards have also obtained certification. It is anticipated that all facilities already authorized under the more stringent EU Ship Recycling Regulation will also be HKC-compliant.

Impact on US Flagged Vessels

The United States is, unsurprisingly, not a party to the HKC. However, U.S.-flagged vessels trading internationally will inevitably be impacted by the new regulations. If trading in countries that are parties to the HKC, or intending to recycle a ship in an HKC-party country such as India or Turkey, vessels will need to carry and maintain a Certificate on Inventory of Hazardous Materials and comply with the various surveys and other documentation requirements of the HKC. Compliance would also be beneficial if the vessel is sold during its operational life or reflagged to an HKC party.

Toward a Greener Future in Ship Recycling?

Critics of the HKC remain. Many NGOs, for instance, have decried the continued use of “beaching” practices, where vessels are grounded on beaches for dismantling, posing significant environmental and safety risks. The HKC also does not impose restrictions on downstream waste management.

Despite these valid criticisms, the shipping industry generally welcomes the HKC for its intent to create a level playing field globally. Since the first IMO negotiations on ship recycling nearly 20 years ago, the industry—which had a dire reputation—has undergone significant changes to comply with stricter environmental and safety regulations.

The HKC certainly establishes a minimum framework to improve both health and safety working conditions and environmental standards worldwide.

By Camille Zuber and Carole Rouffet



United Nations Ocean Conference

The United Nations Ocean Conference took place in Nice, France, in June 2025. The conference aimed to support action to conserve the oceans, seas and marine resources for sustainable development. Various relevant stakeholders, from Governments, international financial institutions, scientific community to non-governmental organizations attended the four-day event.

The committee leadership did not have the pleasure to attend but we asked two attending organizations to provide us insight on the conference. We are very thankful for the comments provided by **AltaSea at the Port of Los Angeles** (<https://altasea.org/>), a non-profit organization dedicated to accelerating scientific collaboration and advancing an emerging blue economy through business innovation, and the **Indonesian Ocean Justice Initiative** (<https://oceanjusticeinitiative.org>), a think tank and policy advocacy group from Indonesia.

Altasea at the Port of Los Angeles

As the Director of Economic and Workforce Development at AltaSea at the Port of Los Angeles, I focus on advancing the blue economy through strategic campus initiatives and programming. During my attendance at UNOC 2025 in Nice from June 9-13, I engaged with UN member states and stakeholders committed to progressing Sustainable Development Goal 14, centered on ocean conservation. My participation was aimed at identifying opportunities in workforce development and forging economic partnerships that could strengthen Los Angeles as a leader in the blue economy sector.

Prior to the main event, I attended the Blue Economy and Finance Forum in Monaco, which took place on June 7-8. Throughout the UNOC conference, I prioritized side events, as they provided practical discussions about ongoing projects and initiatives, as well as valuable networking opportunities. A notable takeaway from the conference was the widespread attention UNOC received in the United States, reflected in media coverage and public engagement. Also, the presence of billboards, public exhibits, and awareness campaigns throughout Nice demonstrated a significant increase in public understanding of ocean industries, restoration efforts, and the importance of SDG 14.

While the conference was impactful, there remains a need for more strategic planning sessions that bridge policy commitments with tangible implementation pathways, particularly in the areas of workforce development and skills training. Many sessions were aspirational but did not sufficiently address the essential question of who will execute this work and the methods by which they will be trained. Greater representation from labor unions, community colleges, and vocational training organizations would be valuable, as these entities play a critical role in building the workforce required for the expanding blue economy.

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Indonesia Ocean Justice Initiative (IOJI)

IOJI participated in the Conference as part of Indonesia's official delegation, beginning with a presentation on international cooperation against transnational criminal networks behind illegal, unreported, and unregulated (IUU) fishing vessels. CEO Achmad Santosa shared insights from Indonesia's collaboration with Norway, including vessel tracking and joint investigations, drawing on his experience as a special advisor to Indonesia's Presidential Task Force to Combat Illegal Fishing.

A major highlight was the event "The Human Dimension of SDG 14: Strengthening Human Rights for Sustainable Ocean," co-organized with BlueRights and Université Côte d'Azur. Indonesia's migrant workers play a crucial role in the global fishing industry, yet their rights are often overlooked, resulting in significant loss of life. IOJI stressed the urgent need to advance international law to protect human rights at sea. Throughout UNOC 2025, IOJI underscored that comprehensive collaboration—encompassing financing, crime prevention, and robust human rights protections—is essential for effective ocean governance.

One of the conference's most significant milestones was the ratification of the Biodiversity Beyond National Jurisdiction (BBNJ) Agreement, which sets out measures for sustainable use of marine genetic resources beyond national borders. IOJI emphasized that financing, crime prevention, and human rights must remain central to the BBNJ agenda. In the face of a triple planetary crisis, ocean protection is more critical than ever. UNOC 2025 called for states to turn pledges into concrete action, as reflected in developments such as the Global Plastic Treaty negotiations, the International Seabed Authority's mining code, the IMO's ship decarbonization resolution, and the imminent entry into force of the BBNJ agreement.

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Want to **become a member** of Our Oceans committee? If you are already a member of the MLA, log in on the MLA website, follow the link Committees & Document Library, click on “Find Committees to Join” and select Our Oceans to receive updates and future newsletters.

Want to **contribute** to the committee? We are happy to hear from you and welcome any ideas you may have! Contact us directly by email.

A special thank you to past MLA President David Farrell for his time and insight on the creation of this committee