



turn back the toxic tide

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Mr. Yang Zhijian
Chairman
COSCO Shipping Lines
No.378, Dong Da Ming Road, Shanghai
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SUBJECT: COSCO Must Commit to Stop Illegal and Unethical Shipments of Plastic Waste and to Urgently Work with the Governments of Turkey and Germany to return the German Waste now sitting in COSCO containers to Germany.

Mr. Yang Zhijian,

On February 17 of 2021, 52 environmental and social organizations wrote you [a letter](#), asking COSCO to join our [Shipping Campaign Commitment](#) and NOT engage in illegal or unethical shipments of plastic waste. In that letter we went to great lengths to explain why the plastic waste trade must cease. We warned about the environmental damage, the social damage, and the fact that such shipments would cost COSCO time, money, and trouble while damaging your corporate reputation. You never answered our letter.

Now COSCO is embroiled in a serious scandal involving numerous containers of plastic waste sent from Germany that have been declared illegal or refused import in Turkey. In accordance with international agreements (Basel Convention, Izmir Protocol, European Union Waste Shipment Regulation), these shipments should have been returned to Germany once stranded in Turkey. Instead, COSCO has helped facilitate their onward export to Vietnam.

-- Already COSCO has shipped 16 containers of German waste from Turkey to Vietnam. Such shipments of German waste to Vietnam are likely to be illegal.

-- Late last year, we, as international NGOs working to fight waste trade, were able to halt the shipment of 37 more containers from being loaded at your facility in Piraeus, Greece, onto the COSCO PRIDE bound for Singapore and then onward to Vietnam. Those 37 containers are sitting now in the port of Piraeus, costing your company money and its reputation.

-- We estimate that another 89 COSCO containers are sitting still in Turkey, stopped from being imported by the Turkish government. These containers are also costing COSCO money and its reputation.

The following are news stories outlining the scandal:

[2 December / NGO Press Release](#)

[18 May Story from WirtschaftsWoche](#)

[17 November Story from WirtschaftsWoche](#)

[2 December Story from WirtschaftsWoche](#)

[31 December Story from the Guardian](#)

Attached is a spreadsheet of the containers involved in COSCO's Turkish scandal revealing all of the container numbers and the ports where they are sitting or have already been sent.

Therefore, and in light of the foregoing, we once again iterate that COSCO must urgently commit to halting movements of Basel Convention controlled wastes (Annex VIII and Annex II, including plastic wastes) from being exported. Where there is doubt as to the whether the plastic wastes are on Annex VIII or II, they should likewise be barred from trade by COSCO.

In this case we believe COSCO has been handed a test as to whether they will achieve a Successful or a Failing grade as an international shipper of commodities.

We call on COSCO to:

1. Immediately take steps to declare your willingness to assist the German government in returning the containers now in Piraeus and in Turkey back to Germany, as is called for in Article 8 of the Basel Convention. And that COSCO does fully cooperate in this repatriation of the plastic wastes.
2. Agree to announce a policy of forbidding trade of and screen all Bills of Lading in future for HS codes of 3915 (plastic waste), including subsets in all of its COSCO voyages, vessels, and leased or owned containers.
3. Take leadership and publish and publicize this policy publicly, while calling on the other major shipping lines listed in our campaign to do the same.

If COSCO responds affirmatively to these three requests, we will grade COSCO's performance accordingly and make this information known to the international media and to Basel Convention competent authorities representing countries all over the world. If it fails in this regard, we will make that result public as well.

As a major player in international trade and sustainability, COSCO needs to do its part to help end the global plastic waste crisis generally, and right now, as the situation is urgent in Turkey and in Greece, COSCO is called upon to show its leadership as a matter of such urgency.

We stand ready to discuss the international legal implications and your policies with you and your staff and to assist in any way we can to achieve this important commitment from you.

Sincerely yours,

Jim Puckett, Basel Action Network,
Jan Dell, Last Beach Cleanup,

on behalf of the 52 aforementioned organizations.

Attached: [Spreadsheet of COSCO Containers](#)