

8 December 2021

Yang Zhijian
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C/O Chairman Ding Nong, COSCO North America

SUBJECT: COSCO Must Commit to Stop Illegal and Unethical Shipments of Plastic Waste and to Urgently Return COSCO Containers of German Waste now in Turkey and Greece to Germany.

Mr. Yang Zhijian,

On February 17 of this year, 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 to you why the plastic waste trade must cease. We warned you about the environmental damage, the social damage, and the fact that such shipments would cost COSCO time, money, trouble, and damage 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 detained 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 likely illegal 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 found to be illegal.

-- Just last week, 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 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.

[NGO Press Release 2 December](#)
[18 May Story from WirtschaftsWoche](#)
[17 November Story from WirtschaftsWoche](#)
[2 December Story from WirtschaftsWoche](#)

Attached is a spreadsheet of COSCO's Turkish scandal revealing all of the container names 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.

In this case 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 demand of the German government that they take the containers now in Piraeus and in Turkey back at their full expense as is called for in Article 8 of the Basel Convention. And that COSCO fully cooperate in this repatriation of the plastic wastes.
2. That COSCO agrees to screen all BoLs to prevent HS code 3915 (plastic waste) from being trafficked in COSCO vessels or COSCO leased or owned containers.
3. That you take leadership and call on the other major shipping lines listed in our campaign to do the same.

If COSCO fails to respond affirmatively to these three requests, we will grade COSCO's performance accordingly publicly and make this information known to the international media and to Basel Convention competent authorities representing countries all over the world.

COSCO needs to do its part as a shipping line to help end the global plastic waste crisis generally, but right now the situation is tense in Turkey and in Greece. COSCO is called upon to show leadership as a matter of 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.