

REVIEW OF MARPOL ANNEX VI AND THE NO_x TECHNICAL CODE

MARPOL 73/78 Annex VI revision - the shipping industry perspective

Submitted by the International Chamber of Shipping, BIMCO, Intercargo,
International Council of Cruise Lines and Intertanko

SUMMARY

Executive summary: This document comments upon document BLG 10/14/2 (Norway) which is, in principle, supported, but the opportunity is taken to draw attention to concerns with some of the detailed proposals. This paper also requests the Sub-Committee to ensure that a rigorous approach is taken in the review of MARPOL Annex VI which should be on a scientific basis and with due regard to environmental need and cost-benefit analysis.

Action to be taken: Paragraph 9

Related documents: MEPC 53/24, MEPC 53/4/4, MEPC 53/4/12, BLG 10/14/1, BLG 10/14/2

1. This document is submitted in accordance with the provisions of paragraph 4.10.5 of the Guidelines of the Organization and method of work of the Maritime Safety Committee and Marine Environment Protection Committee and their subsidiary bodies (MSC/Circ.1099 – MEPC/Circ.405) and comments upon document BLG 10/14/2 (Norway).

Background

2. The long period between the adoption of the text of MARPOL Annex VI and its entry into force in 2005 inevitably means that some of its provisions fall short of contemporary expectations for air emissions worldwide. The shipping industry is very concerned at the emergence of regional emission control measures imposed on international shipping, often with divergent requirements which imply that several different fuel types must be carried onboard. The need for international consensus and for standards to be set at IMO is paramount, but this work should also be able to take account of regional environmental vulnerability. The sponsors of this paper fully support the review that BLG has been invited to undertake.

3. The sponsors believe that the BLG work should be undertaken in the context of three important factors. Firstly there is a need to verify, to the extent possible, the environmental need to make Annex VI provisions more stringent. This will require dedicated study but this may be hampered by a lack of statistics and scientific evidence in some of the areas to be considered. Secondly some of the most efficient measures that could be undertaken involve changes in the bunker fuel used by international shipping. There are complex inter-relationships between the geographical availability of bunker fuel, the sustainability of supply and delivery of bunkers with the required sulphur level and demands for ships to burn specified sulphur content fuel. Thirdly, technology to meet increasingly stringent emission limits is still at the design stage or at best in

C:\DOCUMENTS AND SETTINGS\PENNY.JAGGER\LOCAL SETTINGS\TEMPORARY INTERNET FILES\OLK2\ICS DRAFT FOR BLG ANNEX VI - SECOND DRAFT - 12 JAN 06 (2).DOC

its infancy in some areas and prototype units will require further testing and development before becoming commercially available.

4. The three factors outlined above, make it clear that new regulations to be developed for shipping should be done on a scientific basis and with sufficient time allowed for rigorous investigation before adoption. The aim should be to define a set of parameters that will address environmental concerns and which at the same time give ship owners and operators a sustainable long term framework that takes account of the working life expectancy of modern ships. Emerging technology and innovative ship and component design will ensure that future ships have far lower emissions levels than current ships. However, there are significant limitations to what can be achieved through the retrospective application of technology on current ships and grandfathering arrangements will be sought in some areas.

Norwegian Proposals

5. Norway is to be congratulated for the submission of document BLG 10/14/2 which is a very practical approach to reducing ship emissions. The sponsors can support many of the arguments outlined in the paper and will confine further comment here to those few items that are viewed with concern.

6. It is agreed that NO_x limits will require to be reduced in the future and measures to address this in new engines, subject to discussion with the engine manufacturers, offer an attractive option. However, possible measures to reduce NO_x emissions in engines produced before 1st January 2000 are a much more complex option. The sponsors have concerns that such measures may not be practical, may not deliver sufficiently reduced emissions to be significant or to justify the costs involved. The proposal for differentiated NO_x requirements based upon the SECA model are of considerable concern. Some technical solutions for NO_x reduction do not lend themselves to being switched on and off in accordance with geographical limits. A global solution is a more practical approach.

7. The proposals on the reduction of SO_x are, in principle, supported but agreement on a reduced SECA limit can only be reached having considered the impact on global bunker fuel supply. The sponsors believe that a reduced global cap should also be investigated but only in the context of fuel supply and the SECA limit. The proposal for ships to blend fuel on board is of considerable concern. Whilst some specialist ships do have this capability and should be permitted to continue, it is not a recommended procedure for ships in general which have neither the equipment nor the expertise to guarantee a satisfactory result. Documentation for the fuel being used in these circumstances will be difficult to verify and may lead to port State control problems. Proposals on the sampling of fuel on board ship are not matched to current fuel tank arrangements and could be hazardous.

Implementation of MARPOL Annex VI

8. Since its entry into force in May 2005, the shipping industry has gained much experience with the implementation of MARPOL Annex VI. Some of the difficulties encountered have been caused by the relatively small number of IMO member States to have ratified the Annex to date. It is already known that a further problem will emerge when the Baltic and North Sea SECAs become effective due to the adoption, by the European Union, of effective dates that are different to those adopted by IMO. At the working level, there have been problems with bunker delivery notes and most significantly with bunker fuel quality. ICS believes that these problems need to

be addressed during the review and will introduce more detailed information at a the appropriate stage.

Action requested of the Sub-Committee

9. The Sub-Committee is requested to consider the information provided and, when considering terms of reference for future work, to take action as appropriate.