



MARINE ENVIRONMENT PROTECTION
COMMITTEE
57th session
Agenda item 4

MEPC 57/4/34
22 February 2008
Original: ENGLISH

PREVENTION OF AIR POLLUTION FROM SHIPS

MARPOL Annex VI-related matters

Submitted by the International Transport Workers Federation (ITF)

SUMMARY

<i>Executive summary:</i>	This document comments on the report of BLG 12 on matters relating to the review of MARPOL Annex VI contained in document MEPC 57/4/23
<i>Strategic direction:</i>	7.3
<i>High-level action:</i>	7.3.1
<i>Planned output:</i>	7.3.1.1
<i>Action to be taken:</i>	Paragraph 11
<i>Related documents:</i>	BLG 12/6/1, BLG 12/WP.1; MEPC 57/4/15 and MEPC 57/4/23

1 This document provides comments on document MEPC 57/4/23 and is submitted in accordance with paragraph 4.10.5 of the Committees' Guidelines (MSC-MEPC.1/Circ.1) and the relaxed deadline for comments documents on the air pollution item to MEPC 57 with prior authorization of the MEPC Chairman following consultations with the Secretariat in line with paragraph 4.12 of the Committees' Guidelines.

2 ITF has fully supported the revision process of MARPOL Annex VI and has considered fully, the report of the Informal Cross Government/Industry Scientific Group of Experts.

3 ITF notes that the report of BLG 12 identified the following three options to reduce SO_x emissions:

Option 1 – A global application which would apply a 1.00% fuel standard in [2012] and 0.50% in [2015].

Option 2 – Retain the global cap at 4.50% but set a cap of 0.10% in [2012] in Emission Control Areas.

Option 3 – Reduce the global cap to 3.00% in [2012]. Reduce Emission Control Area standard to 1.00% in [2010] and 0.50% in [2015]. Adopt a mechanism for the approval

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of micro-Emission Control Areas at a distance of no more than 24nm from the baseline with a 0.10% standard. Such micro-Emission Control Areas would have a relaxed set of criteria when compared to Emission Control Areas

4 ITF is conscious that in the interests of the environment, climate change and public health concerns, society is demanding a global reduction in sulphur and CO₂ emissions by the shipping industry. The only option that clearly addresses this is Option 1, and although implementation dates may not be entirely practical, it is in ITF's opinion, the only realistic way to proceed.

Considerations

5 Ultimately, the control of emissions in a limited number of refineries rather than 50,000 ships, must be preferred. The refineries have a fairly controlled steady situation in which to operate, unlike ships that operate at various speeds and are expected to change over fuels in every SECA. Refineries can comply with the strictest emission requirements and should have options such as carbon capture at their disposal. Although the petroleum industry has stated that it will require a substantial investment to increase the output of distillate fuel worldwide and that the industry will be unable to supply the quantity of distillate required for some time to come, ITF notes that changes in legislation ashore have not had any similar problems.

6 Abatement systems, in particular, seawater scrubbers, are in their infancy, expensive to retrofit and not readily available in sufficient quantities to allow implementation dates to be met. Exhaust gas cleaning systems have a number of substantial problems, not least the space they require on board and the seawater supply they need to operate. There will be a quantity of acidic residue generated to be stored and disposed of that cannot be incinerated, and seawater scrubbers can only be used in deep sea.

7 The report of the informal Cross Government/Industry Scientific Group of Experts recognizes that there is more fuel related work for engine room staff where residual fuels are used and this would expand further with the increase of SECAs and abatement systems. With the pressures to keep to minimal manning and the problems of attracting and retaining qualified and competent seafarers, this extra workload is unwarranted.

8 There is a lack of studies on the effects of emissions on seafarers and workers in dock areas. However, studies on shore-based cohorts suggest that there is a substantial risk to all workers and communities subjected to these emissions. The Corbett and Winebrake study estimates the premature mortality each year in the tens of thousands. This is primarily due to cardio pulmonary and lung cancer mortality. Although a switch to distillates would not address all the environmental and human health concerns related to shipping emissions, the evidence does suggest that since emissions would be considerably reduced, the benefits would be significant.

9 The effects of working, maintaining and cleaning engines using residual fuel have not been documented, but given that this fuel consists of the residue left at the bottom of the barrel after the refinery process, it would be fair to assume that it constitutes a greater risk to those who may be handling and inhaling it than the cleaner distillate option.

Conclusions

10 The best interests of seafarers and the public in general are served by pursuing Option 1 and instituting an industry-wide change to low sulphur distillate fuels. It is ITF's opinion, given a realistic implementation period, that the refinery industry will respond and the subsequent costs

to adapt vessels for distillates will be minimal. Although the fuel costs will be higher, there are currently human and environmental costs that have not been factored into the equation. Given that the industry has to change in order to prevent the harm caused by emissions, it is preferable to ensure that costs are born fairly across the industry and in the most efficient manner. There are never any assurances of the ultimate fuel costs. However, given the possible costs of retaining residual fuels, financially, environmentally and to human health, ITF believes the move to distillates is the best available option.

Actions requested of the Committee

11 The Committee is invited to consider the observations provided and take action as appropriate.
