



Brussels  
11<sup>th</sup> January 2017

To: Mr. Kitack Lim, Secretary General International Maritime Organisation  
From: the Clean Shipping Coalition

Dear Secretary-General Lim,

The Clean Shipping Coalition is surprised and disappointed by your letter to the president of the European Parliament (EP) criticising last month's decision by the EP's Environment Committee to include EU-related shipping emissions in the EU's Emissions Trading Scheme.

The decision to include shipping in the EU ETS was taken by the European Parliament, whose members are directly elected by European citizens and therefore have direct legitimacy in EU policy-making. As representatives of civil society and observers at the IMO, we do not think it is appropriate for you in your capacity as Secretary General of the IMO, an essentially unelected body, to interfere in the EU internal democratic process. Your actions are of particular concern since the EU measure you object to is a timely and balanced response to the urgent problem of growing ship emissions, and is designed to help the EU meet its commitments under the Paris Agreement and thereby help prevent catastrophic climate change.

Indeed, the decision taken last month by the Environment Committee includes a compromise provision, which will see shipping included in the EU ETS only from 2023 and only if the IMO fails to deliver a global agreement on ship emission according to its own recently agreed GHG roadmap. We are concerned that your intervention suggests you think the IMO might fail to meet this stated promise of agreeing on a new global GHG measure.

The IMO was first tasked with addressing ship GHG emissions by the Kyoto Protocol in 1997. In the 20 years since then it has agreed only one measure, the Energy Efficiency Design Index (EEDI). As the recent review of the EEDI has shown, this is not fit for purpose in its current form, yet last year the IMO delayed until 2018 any consideration of strengthening its stringency.

The Paris Agreement calls for all sectors and emissions to be addressed urgently to avoid catastrophic climate change. The IMO's response to this has been to restart a work plan dating from 2003 that now only foresees action in 7 years' time. The problem of climate change is too urgent and we cannot afford to sit by and wait for IMO action alone.

We are concerned that rather than take issue with those IMO member states and industry bodies which are obstructing progress on shipping climate action you have chosen to

criticise those who are responding in an appropriate, timely and proportionate manner to the Paris Agreement's urgent call for action.

The IMO appears to believe that it has a sole right to act in this area, no matter how long that might take. Both the Kyoto Protocol and the Paris Agreement recognise the urgent need for developed states to take the lead. Unilateral or regional action by such developed states (or indeed any other) is not at odds with the Paris Agreement or the IMO. Rather it is an important complementary effort.

The IMO's intervention in the EU's democratic process is regrettable.

We hope now Mr Secretary-General that you will take stock and direct your efforts towards those IMO member states and others that are blocking and slowing down action at IMO level, so that we can more swiftly reach an ambitious global agreement on ship GHG emissions. In this we can assure you and the IMO of CSC's continued support.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'John Maggs', written on a light-colored background.

John Maggs  
President  
Clean Shipping Coalition