



To: Environment Minister of EU Member States
Cc: Commissioners for Environment and Transport, and the Chair of the European Parliament Environment Committee

Brussels, 10 December 2013

Dear Minister,

I am writing on behalf of a coalition of environmental, health and citizens' organisations to express our concerns over the lack of ambition within European countries to address the important environmental problem of nitrogen oxides (NO_x) emissions from international shipping.

Maritime transport is becoming one of the largest sources of air pollution in Europe. Recent analysis concluded that if nothing is done to substantially curb these emissions, NO_x emitted by ships sailing in European waters is projected to equal and exceed emissions from all land-based sources from 2020.¹ This could seriously exacerbate the already persistently high levels of EU ecosystems subject to nitrogen deposition. Two thirds of EU ecosystems are still over-exposed to nitrogen deposition. Moreover because much shipping activity occurs close to shore, ship emissions have a significant impact on human health and the environment with studies suggesting air pollution from international shipping causes some 50,000 premature deaths annually in Europe alone.

In May 2013, the International Maritime Organisation (IMO) reached a preliminary agreement to postpone until 2021 much stricter international NO_x emissions limits for new ships due to take effect in 2016. The original IMO decision was reached unanimously in 2008. The postponement, introduced by the Russian Federation, directly contradicted the opinion of the IMO expert group on compliance options and took many delegations by surprise. Six EU countries supported the Russian proposal while nine Member States stayed

¹ EEA Technical report No 4/2013: The impact of international shipping on European air quality and climate forcing. Available at <http://www.eea.europa.eu/publications/the-impact-of-international-shipping>

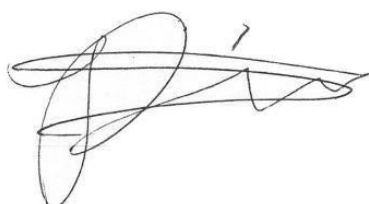
silent.² The lack of a united and ambitious European position on shipping NOx pollution largely explains the poor outcome.

The preliminary decision needs to be ratified by a vote of all IMO Parties to MARPOL Annex VI in April 2014. Confirmation would constitute a severe U-turn by the IMO on regulating ship emissions and seriously compromise the credibility of MARPOL Annex VI. Moreover, postponing the NOx rules just two years before their planned entry into force will not only constitute a severe environmental setback, punish the clean tech industry which has invested hundreds of millions of euros in preparation for 2016 but also cause enormous indecision about NOx and other maritime air pollution regulations.

The problem of NOx emissions from maritime transport is not included on the 13 December Environment Council agenda, but we urge you to reserve some time to discuss this important issue.

EU member states collectively own the world's largest merchant fleet and are thus well placed to take a leading, responsible and united role at the IMO. The case for them doing so is that more compelling given the problems of NOx pollution across the EU. We urge you to ensure the EU adopts a harmonized and responsible position at the forthcoming IMO discussions. Mitigating shipping NOx emissions is critical to providing sufficient protection to the environment, human health and ecosystems and action is needed sooner rather than later.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jos Dings', with a stylized flourish at the end.

Jos Dings,
Director
Transport & Environment

² EU countries supporting the postponement of the NOx standard: Cyprus, Estonia, Greece, Latvia, Malta, Poland. EU countries supporting the IMO expert group conclusions: Belgium, Denmark, Finland, France, Germany, Italy, Sweden, United Kingdom. EU countries, which did not express position: Bulgaria, Ireland, Lithuania, Luxembourg, the Netherlands, Portugal, Romania, Slovenia, Spain + Croatia (not Member at the time of the IMO discussion).