



Mr Koji Sekimizu,
Secretary-General,
International Maritime Organisation,
London, United Kingdom

By email

Brussels, 25 November 2013

Dear Secretary General,

Members of the Clean Shipping Coalition, Friends of the Earth - US, Pacific Environment, the Antarctic and Southern Ocean Coalition, and the European Environmental Bureau share with the IMO a strong interest in reducing air pollution from ships. We are, however, concerned at recent statements that suggest the IMO Secretariat itself is taking a position to advance the review date for the availability of low-sulphur fuels.

We support in principle the need to provide stakeholders as much certainty as possible to comply with the 2008 MARPOL standards. However, there are many reasons to believe that calls for an early review of fuel availability are not in fact directed towards undertaking a dispassionate analysis of the actual fuel situation. Rather, we are concerned they may represent an attempt to secure a political opening at MEPC to bring into question the implementation date of the low-sulphur standards agreed unanimously by the IMO in 2008.

We say this against a clear trend of rising industry opposition to all forms of maritime environmental legislation exemplified most recently by the proposal at MEPC 65 to postpone the 2016 implementation date of the Tier III NOx requirements. Acceptance of this proposal would bring the whole MARPOL regime into question and reflect in a very poor way on the effectiveness and credibility of the IMO. Any subsequent backsliding on the 2020 implementation date of the low-sulphur requirements would severely undermine the IMO.

We do not, in fact, believe that accelerating the fuel availability analysis more than five years out from implementation will provide meaningful results or bring additional security to the shipping industry. Fuel availability is in the hands of the refiners and, as you have stated, the oil industry has indicated there will be enough fuel available in 2020. The 2008 decision itself was already preceded by a cross-government/industry expert review (BLG 12/6/1). Having given industry more than adequate notice to prepare – 12 years – it is imperative for the IMO's regulatory role that it stand firm on the 2020 implementation date.

We also question the line of argument being put forward that the cost burden of low-sulphur fuels is too great for the shipping sector to bear alone and should be borne by society overall. As with other industrial sectors, there is no reason for the shipping industry to be exempted from Principle 16 of the Rio+20 Declaration that 'the polluter should, in principle, bear the cost of pollution'. The significant efficiency measures available at no or

negative cost in the shipping sector should be taken up to help mitigate the cost increase generated by the use of low-sulphur fuel.

It is probably inevitable that some cost increases will need to be passed on to end-users of shipping services. Such internalisation of external costs is in fact an effective and appropriate way to ensure that all costs, including environmental and health, are better reflected in the price of goods shipped and purchased. These environmental externalities are currently not being taken into account and are instead being borne solely by those directly affected by shipping pollution, i.e. local populations, etc. To illustrate this, health-related costs in Europe alone caused by air pollution from international shipping are expected to increase from €58bn to €64bn per annum between 2000 and 2020 and provoke 50,000 premature deaths annually.

Mr Secretary-General, we call on you to help ensure that any discussion on the review of regulation 14 of MARPOL Annex VI is held in an independent and fair manner, recognising the availability of different technologies to meet the standards, the sufficient current and projected amount of compliant fuel available (including alternative fuels such as LNG) and the regulatory framework in different shipping regions such as Europe and North America. We also look forward to your support in ensuring that consideration of these issues at the IMO is held in a manner that fully upholds the environmental objectives set out in MARPOL.

Yours sincerely,



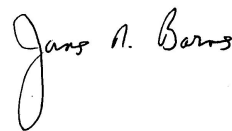
Elco Leemans
President
Clean Shipping Coalition



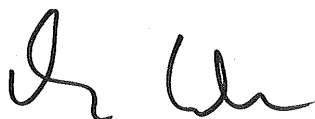
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