

From: Alan Mills [REDACTED]
Sent: Monday, 11 February 2019 4:22 PM
To: Maritime Transport
Subject: MARPOL Annex VI submission

Dear Sir/Madam

Please find my submission below:

MARPOL Annex VI submission

Alan Mills, Opotiki, NZ

More than a decade ago 86 countries signed an agreement to tackle air pollution from ships by implementing 0.1% sulphur limits.

New Zealand opted not to sign, choosing instead to continue to use and allow onto its shores a heavy fuel with high sulphur blends rejected by most of the developed world. The MARPOL Annex VI submission gives New Zealand the opportunity to come of age, reduce the number of serious health problems caused by this heavy fuel, and live up to its 'clean green image'.

0.1% sulphur has been the benchmark standard for MARPOL Emission Control Areas (ECA's), including Hawaii and Puerto Rico, since 2015. Ports such as Sydney have also regulated outside of MARPOL and adopted the 0.1% standard. If New Zealand signs onto the MARPOL Annex VI provisions without implementing 0.1% sulphur limits, we are effectively positioning ourselves at the lowest standard globally.

Norway, in contrast, is presently implementing the 0.1% standard and moving to implement a zero emissions standard for its fjords by 2026. The move is apparently a result of studies finding that cruise ship pollution in the fjords has resulted in air quality being hazardous to human health. Fiordland and the Marlborough Sounds clearly have similarly confined waterways to those of Norway and are also under increasing pressure from shipping traffic. Because of these similarities, it seems reasonable to conclude that the 0.1% ECA benchmark is a much more suitable standard to implement than the default lowest global standard of 0.5% from 2020.

At present, Government-owned Interislander ferries use the heavy fuel oil. The Marlborough Sounds, an iconic area of spectacular beauty in New Zealand, is especiall prone to air pollution because of the prevailing northerly winds and the steep-sided narrow valleys which trap emissions low to the water. Each year 7500 ships roll in and out of Port Marlborough,

most of these being the Interislander ferries and Strait Shipping's Bluebridge ferries. So why no monitoring?

Despite Regional Councils being required to monitor air quality in areas that were "likely" to have a problem, the Marlborough District Council stopped measuring PM, in particular PM10, in Picton in 2012.

A report prepared for Marlborough Regional Council in 2014 said further monitoring of PM10 in Picton was needed. However, Council's response was that no further monitoring was required as it "is not currently a priority in our environmental programmes".

It is disturbing that the level of marine pollution experienced on a daily basis in Picton, and in other ports throughout New Zealand, is currently being disregarded.

New Zealand's stated ambition is to be a global leader on climate change and strengthen our credibility and influence in international climate negotiations.

To enable New Zealand to influence climate change policy at the IMO I support New Zealand in acceding to International Maritime Organization treaty: MARPOL Annex VI: Prevention of Air Pollution from Ships and in being at the table to influence decisions.

Kind regards

Alan

ALAN MILLS

Opotiki