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PREVENTION OF AIR POLLUTION FROM SHIPS

Possible Framework for Action for Addressing Greenhouse Gas Emissions from International Shipping

Submitted by the United States

SUMMARY

Executive summary:	This document proposes a possible framework for action to increase energy efficiency for new ships through a combination of mandatory and voluntary actions for addressing emissions from new and existing ships
Strategic direction:	7.3
High-level action:	7.3.1
Planned output:	7.3.1.1
Action to be taken:	Paragraph 10
Related document:	MEPC 57.21, paragraph 4.114

Introduction

1 It has been noted repeatedly by numerous delegations that maritime transport represents the most energy efficient form of transportation. This fact is important as we consider the most appropriate mechanism(s) for improving the efficiency and emissions profile of the maritime sector.

2 Given the significant energy efficiencies offered by the maritime sector, many countries have implemented policies to encourage greater transport by sea to mitigate the negative impacts associated with transport through less efficient modes such as aviation, trucking and rail. Indeed, many countries have embraced policies that encourage greater transport of goods by sea to improve emissions, mitigate congestion in cities and roadways, and to improve energy consumption. Recognizing the broader transportation issues and public policy issues at stake, the United States believes it is important to avoid policies that would reduce incentives to use the most efficient form of transport available.

3 As we have seen in our discussions in the Committee, identifying how to address international maritime greenhouse gas emissions is subject to divergent views. This reflects the significant ramifications that decisions by this body will have on the environment and the efficiency of maritime transport. Part of this divergence of views may derive from the fact that many delegations do not feel current proposals present adequate options for moving forward. This paper proposes a possible way to bridge these views by increasing energy efficiency for new and existing ships through a combination of measures. This approach has a number of virtues as it would:

.1 increase efficiency across the entire fleet of new and existing vessels leading to reduced fuel costs for shipowners and consumers as well as reduced greenhouse gas emissions;

.2 be performance oriented, allowing the maximum flexibility to shipowners in determining how to comply;

.3 be easily put in place and implemented in a way that is patterned after other technical Annex VI programmes;

.4 minimize administrative burdens; and

.5 take into account differing circumstances of ships in a manner consistent with IMO's mandate.

A framework for a possible way forward

4 Recognizing the considerable challenges that we face in reaching agreement on international maritime emissions, the United States proposes the following framework that calls for a legally-binding mechanism to improve fuel efficiency across the maritime fleet with a consequent reduction in greenhouse gas emissions. The two essential elements of the proposal are as follows:

.1 Regarding new ships, IMO should mandate that ships built on or after a certain date (e.g., 20[XX]) would be required to meet a specific efficiency standard derived through use of the design index currently being developed by the Committee. This standard could be further improved in a second and third tier with a more demanding efficiency level required in later years as deemed appropriate (e.g., 20[20] and 20[50]).

.2 Regarding existing ships, IMO should: a) require shipowners at a certain date (e.g., 20[XX]) to develop ship-specific management plans based on guidance to be developed by the Committee that would identify measures to increase efficiency given different ship operating modes (e.g., in transit, manoeuvring, cargo handling, at anchor, as well as the ship-port interface); and b) at some later date consider how such energy efficiency plans could be used and if they could lead to specific mandated efficiency improvements.

5 The standards in item one (1) are similar in concept to the technical NO_x limits contained in regulation 13 of Annex VI and would be derived from the design index developed by the Committee and from data assembled by the parties and relevant industry members. The ship-specific energy efficiency management plan described in item two (2) is similar to other technical management plans that are currently required in other programmes (e.g., ship safety, VOC and security plans).

6 The specific application dates, scope, and standards would be determined through discussion in the Committee following examination and review of the relevant data and technology application potential.

7 The United States believes that such an approach provides a way forward that would result in quantifiable and discrete improvements in energy efficiency, cost savings across the maritime sector, and reduced greenhouse gas emissions. The approach is goal-based and performance oriented and allows the shipowner and operator to determine what technologies or management methods are to be used to achieve the definitive improvements in the energy efficiency of the ship.

8 Furthermore, the proposal meets all of the principles as discussed at MEPC 57, in particular, transparent, fraud-free, and easy to administer. The framework would not require amendment to MARPOL and is also fully consistent with standard setting practices used successfully for decades within the IMO while not undermining or conflicting with principles established in other international bodies.

9 The approach offers benefits to both developing and developed countries since it will lead to a reduction in the cost of goods shipped by sea and will allow both the developing and developed world to enjoy the many societal benefits associated with improved efficiency in the maritime transport of goods.

Action requested of the Committee

10 The Committee is invited to consider the proposal outlined above and to further develop the approach within the Committee.