

MARINE ENVIRONMENT PROTECTION
COMMITTEE
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Agenda item 9

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POLLUTION PREVENTION AND RESPONSE

Comments on the outcome of PPR 8

Submitted by Greenpeace International, WWF, Pacific Environment and CSC

SUMMARY

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| <i>Executive summary:</i> | This document provides comments on the outcome of PPR 8 and proposes an MEPC resolution – a form of non-mandatory instrument addressing Black Carbon emissions from shipping in or near the Arctic |
| <i>Strategic direction, if applicable:</i> | 3 |
| <i>Output:</i> | 3.3 |
| <i>Action to be taken:</i> | Paragraph 7 |
| <i>Related documents:</i> | MEPC 75/1/3/Corr.1, MEPC 75/5/4, MEPC 75/10, MEPC 75/10/Add.1, MEPC 75/10/6; PPR 8/5, PPR 8/WP.1/Rev.1 and MEPC 76/9/7 |

Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the document on the *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.2). It provides comments on the outcome of PPR 8 and the action requested of the Committee in paragraphs 2.6 and 2.7 of document MEPC 76/9/7 (Secretariat). In addition, it refers to documents MEPC 75/5/4 (FOEI, WWF, Pacific Environment and CSC) and MEPC 75/10/6 (FOEI, Greenpeace International, WWF, Pacific Environment and CSC) which have been deferred from MEPC 75 to MEPC 76 (see MEPC 75/1/3/Corr.1, annex 4).

2 At PPR 8 in March 2021 a phased approach to the consideration of potential regulatory options to reduce the impact on the Arctic of emissions of Black Carbon from international shipping was proposed, consisting of the development of guidelines in the short-term with the potential for mandatory measures being introduced in the longer-term. In the final draft report of PPR 8 (PPR 8/WP.1/Rev.1) it is recorded that although the large majority of delegations that spoke welcomed the proposal for revised terms of reference for this output, some delegations expressed the view that progress on this issue was slow, and one delegation explicitly supported the development of a non-binding MEPC resolution to

support a switch to distillates in the Arctic. Stricter engine standards and engine retrofits along with routine monitoring of Black Carbon measures on board ships were also suggested as part of future control measures (PPR 8/WP.1/Rev.1, paragraphs 5.19 to 5.21).

3 Progress to identify and agree on regulatory options to address Black Carbon emissions from international shipping that impact the Arctic has been frustratingly slow and the co-sponsors now consider that there is little hope of identifying and agreeing any mandatory policy options which could take effect before 2025 – the deadline for the Arctic Council's aspirational goal to reduce Black Carbon emissions by 25 to 33 percent relative to 2013 levels. In addition to the goal of reducing Black Carbon emissions, only two years ago the Arctic Council's Expert Group on Black Carbon and Methane made a recommendation that actors should "Develop, as appropriate, and report on measures and best practices to reduce particulate matter and black carbon emissions from shipping" as a matter of urgency. The co-sponsors however believe that it is now unlikely that policy options to control Black Carbon emissions from international shipping impacting the Arctic will be agreed and implemented in sufficient time to contribute to preventing the complete loss of Arctic summer sea ice on some days.

4 In document MEPC 76/9/7 (paragraph 2.6.7), PPR 8 seeks approval of the updated terms of reference for further work on the reduction of the impact on the Arctic of Black Carbon emissions from international shipping, as set out in paragraph 5.23 of document PPR 8/WP.1/Rev.1, which includes recognition that MEPC 74 had previously noted that action could include non-mandatory instruments such as guidance (MEPC 74/18, paragraph 5.67).

5 In document MEPC 75/5/4 (deferred to MEPC 76) FOEI et al. proposed that MEPC take its first concrete action to address Black Carbon emissions including developing a non-mandatory instrument in the form of an MEPC resolution which would call for a voluntary switch to distillate fuels for ships operating in or near the Arctic, with a vision that such a resolution could cover a period until a mandatory measure took effect. In document MEPC 75/10/6 (deferred to MEPC 76), the co-sponsors submitted a fuller proposal for the development and adoption of such a non-mandatory instrument and identified elements that could contribute to an MEPC Black Carbon resolution. Such a resolution would signal the intent of the IMO Members to address the climate and health impacts of Black Carbon through action to reduce emissions of Black Carbon from international shipping impacting the Arctic. In response to the discussion and decision by PPR 8 to adopt a phased approach to the consideration of potential regulatory options to reduce the impact on the Arctic of emissions of Black Carbon (PPR 8/WP.1/Rev.1, paragraph 5.19) and the recognition at PPR 8 that MEPC 74 has noted that action could include non-mandatory instruments (PPR 8/WP.1/Rev.1, paragraph 5.23), the co-sponsors have set out in the annex a draft MEPC resolution for consideration.

6 The proposal for a fuel switch in the Arctic to reduce Black Carbon emissions is the only policy option that has been put forward on a number of occasions, including in the following documents:

- .1 PPR 7/INF.15 (paragraph 7.6), submitted by Canada, Finland, the Netherlands and the Republic of Korea, which provided a summary of an international technical workshop which identified as one of six appropriate Black Carbon control policies "a switch to distillate fuel or other cleaner fuels";
- .2 PPR 8/5 (paragraph 9), the report of the Correspondence Group on Reduction of the Impact on the Arctic of Black Carbon Emissions from International Shipping, coordinated by Canada, which concluded that

"a focused policy of fuel switch only, including a switch to cleaner fuels, together with a fuel specification, would not require Black Carbon measurement...."; and

- .3 PPR 8/5/3, submitted by IPIECA and IBIA, which identified measures which could be promoted on a voluntary basis to reduce Black Carbon emissions in the Arctic in the short term, including a voluntary switch to distillate fuels, in particular on ships using medium or high speed 4-stroke engines.

Action requested of the Committee

7 The Committee is invited to consider the matters raised in paragraphs 2 to 6 and urged to progress an MEPC resolution, set out as a draft in the annex, addressing the voluntary use by ships operating in or near the Arctic of distillate or other cleaner alternative fuels or methods of propulsion.

ANNEX

**DRAFT RESOLUTION MEPC.[...](76)
Adopted on [...] 2021**

PROTECTING THE ARCTIC FROM SHIPPING BLACK CARBON EMISSIONS

THE MARINE ENVIRONMENT PROTECTION COMMITTEE,

RECALLING that MEPC 62 agreed to a work plan including an investigation of appropriate control measures to reduce the impact of Black Carbon emissions from international shipping,

RECALLING ALSO that MEPC 76 approved the updated terms of reference for further work on the reduction of the impact on the Arctic of Black Carbon emissions starting with guidelines on goal-based control measures to reduce the impact on the Arctic of Black Carbon emissions from international shipping,

RECOGNIZING that Black Carbon is a potent short-lived contributor to climate warming,

- second only to CO₂ in terms of international shipping's impact on the global climate,
- which represents 7% to 21% of shipping's overall GHG equivalent impact on the climate depending on whether it is measured on a 100 or 20-year timescale; and
- where the impact is amplified many times when it deposits onto snow and ice with a much greater warming impact,

RECOGNIZING ALSO that as a portion of particulate matter (PM_{2.5}), Black Carbon has a negative impact on human health, and has been linked to respiratory and cardiovascular disease, cancer and birth defects,

NOTING that the Arctic Council recommended a collective, aspirational goal to further reduce Black Carbon emissions by 25 to 33% relative to 2013 levels by 2025, and also agreed a recommendation which called for development, as appropriate, and reporting on measures and best practices to reduce particulate matter and black carbon emissions from shipping as a matter of urgency,

HAVING CONSIDERED the threat to the Arctic from ships' Black Carbon emissions since MEPC 74, and understanding that the development of "goal-based guidelines" and mandatory control measures will require further work and time, but

RECOGNIZING that the Fourth IMO GHG Study's emission factors show that, when used in the same engine, a switch to distillate reduces BC emissions per kilogram of fuel consumption by up to 79% in 2-stroke engines and by up to 42% in four-stroke engines, and

CONSIDERING IT DESIRABLE that Member States commence addressing the threat to the Arctic from all sources of Black Carbon emissions, including shipping, and report on measures and best practices to reduce Black Carbon emissions from shipping,

URGES Member States and ship operators to voluntarily use distillate or other cleaner alternative fuels or methods of propulsion when operating in or near the Arctic.