POLLLUTION PREVENTION AND RESPONSE

Comments on the outcome of PPR 8

Submitted by Canada, Finland, France, Germany, Iceland, Netherlands, Norway, Solomon Islands, Sweden, United Kingdom and United States

SUMMARY

Executive summary: This document provides comments on the outcome of PPR 8 and proposes adopting an MEPC resolution to support a voluntary use of cleaner fuels by ships operating in or near the Arctic. The resolution sets out a recommended first measure as part of the phased approach to the consideration of potential regulatory options to address Black Carbon emissions from shipping agreed at PPR 8.

Strategic direction, if applicable: 3

Output: 3.3

Action to be taken: Paragraph 6

Related documents: MEPC 75/5/4, MEPC 75/10, MEPC 75/10/Add.1, MEPC 75/10/6; PPR 7/8/2, PPR 7/INF.15; PPR 8/5, PPR 8/5/1, PPR 8/5/3, PPR 8/13; MEPC 76/9/7 and MEPC 76/9/10

Introduction

1. This submission is made in accordance with the provisions of paragraph 6.12.5 of 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 in document MEPC 76/9/7 (Secretariat). In addition, it refers to a number of documents submitted to IMO concerning Black Carbon emissions.

2. Noting that progress on developing and adopting control measures to reduce Black Carbon emissions from international shipping was slow, PPR 8 agreed to the revised draft terms of reference for further work on the reduction of the impact on the Arctic of Black Carbon emissions from international shipping set out in paragraph 5.23 of document PPR 8/13 (Secretariat). PPR 8 invited MEPC 76 to approve the updated terms of reference (MEPC 76/9/7, paragraph 2.6.7).
3 Taking into account that MEPC 74 had noted that action considered in respect of reducing the impact on the Arctic of Black Carbon emissions from international shipping could include non-mandatory instruments such as guidance (MEPC 74/18, paragraph 5.67), the revised terms of reference recommend, inter alia, to develop, as a starting point, guidelines on recommendatory goal-based control measures to reduce the impact on the Arctic of Black Carbon emissions from international shipping, taking into account the identified candidate control measures, as presented in annex 9 to document PPR 6/20/Add.1.

4 One of the identified control measures to reduce Black Carbon emissions from ships is switching fuel while operating in the Arctic. The Fourth IMO GHG Study 2020 indicates that when used in the same engine, a switch to distillate fuel can reduce Black Carbon emissions per kilogram of fuel consumption by up to 79% in 2-stroke engines and by up to 52% in four-stroke engines. Further, the study in document PPR 8/5/1 (Finland and Germany) demonstrated how the aromatic content of fuels affects Black Carbon emissions. Switching fuel while operating in the Arctic has been recommended as a potential policy option in a number of documents to IMO including documents PPR 7/8/2 (FOEI et al.), PPR 7/INF.15 (Canada et al.), PPR 8/5 (Canada), PPR 8/5/3 (IPIECA and IBIA), MEPC 75/5/4 (FOEI et al.), MEPC 75/10/6 (FOEI et al.) and MEPC 76/9/10 (Greenpeace International et al.). In addition, the three latter submissions, put forward a proposal to adopt an MEPC resolution supporting use of cleaner fuels in the Arctic. A voluntary fuel switch is also a measure that can be implemented today.

5 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 Black Carbon emissions (PPR 8/13, paragraphs 5.19 to 5.24), the co-sponsors propose that MEPC take its first concrete action to address Black Carbon emissions by developing a non-mandatory instrument in the form of an MEPC resolution to support a voluntary use of cleaner fuels by ships operating in or near the Arctic. The annex to this document contains the draft MEPC resolution for consideration.

**Action requested of the Committee**

6 The Committee is invited to consider and adopt the draft MEPC resolution proposed 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.

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ANNEX

DRAFT MEPC RESOLUTION

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, and that according to IMO's 4th GHG study it:

.1 is second only to CO₂ in terms of international shipping's impact on the global climate; and

.2 represents 7% of shipping's overall GHG equivalent impact on the climate based on a 100-year timescale,

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

RECOGNIZING that the Fourth IMO GHG Study's emission factors show that, when used in the same engine, a switch to distillate reduces Black Carbon emissions per kilogram of fuel consumption by up to 79% in 2-stroke engines and by up to 52% in four-stroke engines, and

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

URGES Member States and ship operators to voluntarily use distillate of low aromaticity or other cleaner alternative fuels or methods of propulsion that have been shown to reduce Black Carbon emissions from ships when operating in or near the Arctic.