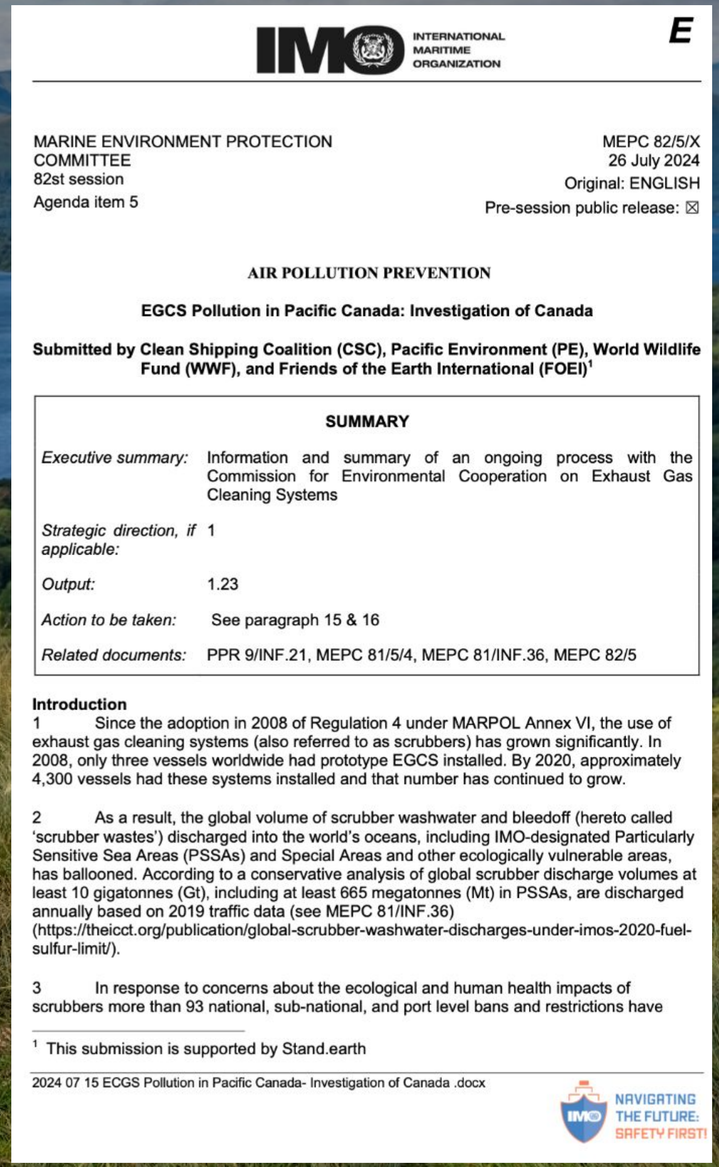
Discharge of scrubber wastewater

Anna Barford (she/her)
Canada Shipping Campaigner
Stand.earth

anna@stand.earth

STAND.earth



IMO INTERNATIONAL MARITIME ORGANIZATION

E

MARINE ENVIRONMENT PROTECTION COMMITTEE
82st session
Agenda item 5

MEPC 82/5/X
26 July 2024
Original: ENGLISH
Pre-session public release: ☒

AIR POLLUTION PREVENTION

EGCS Pollution in Pacific Canada: Investigation of Canada

Submitted by Clean Shipping Coalition (CSC), Pacific Environment (PE), World Wildlife Fund (WWF), and Friends of the Earth International (FOEI)[1]

SUMMARY

Executive summary:	Information and summary of an ongoing process with the Commission for Environmental Cooperation on Exhaust Gas Cleaning Systems
Strategic direction, if applicable:	1
Output:	1.23
Action to be taken:	See paragraph 15 & 16
Related documents:	PPR 9/INF.21, MEPC 81/5/4, MEPC 81/INF.36, MEPC 82/5

Introduction

1 Since the adoption in 2008 of Regulation 4 under MARPOL Annex VI, the use of exhaust gas cleaning systems (also referred to as scrubbers) has grown significantly. In 2008, only three vessels worldwide had prototype EGCS installed. By 2020, approximately 4,300 vessels had these systems installed and that number has continued to grow.

2 As a result, the global volume of scrubber washwater and bleedoff (hereto called 'scrubber wastes') discharged into the world's oceans, including IMO-designated Particularly Sensitive Sea Areas (PSSAs) and Special Areas and other ecologically vulnerable areas, has ballooned. According to a conservative analysis of global scrubber discharge volumes at least 10 gigatonnes (Gt), including at least 665 megatonnes (Mt) in PSSAs, are discharged annually based on 2019 traffic data (see MEPC 81/INF.36) (https://theicct.org/publication/global-scrubber-washwater-discharges-under-imos-2020-fuel-sulfur-limit/).

3 In response to concerns about the ecological and human health impacts of scrubbers more than 93 national, sub-national, and port level bans and restrictions have

[1] This submission is supported by Stand.earth

NAVIGATING THE FUTURE: SAFETY FIRST!

The submission

EGCS Pollution in Pacific Canada: Investigation of Canada

Information and summary of an ongoing process with the Commission for Environmental Cooperation on Exhaust Gas Cleaning Systems, **STAND.earth is alleging that Canada is in violation of their own species and ecosystem protection laws by allowing the discharge of scrubber wastewater following IMO rules**

01 Sensitive Areas Species at Risk

Scrubber washwater contains persistent and bioaccumulative contaminants, is strongly acidic, and a source of thermal pollution. These various pollutants can worsen water quality and bioaccumulate throughout food webs, and have been identified as problem contaminants for endangered species recovery. Further, scrubber wastes are often not discharged into pristine environments, but rather ecosystems already bearing some contamination. Inputs of contaminants from scrubber wastes may push ecosystems beyond thresholds.

Predators at or near the top of the food chain, such as salmon and orcas, often bear greater pollution burdens and may suffer greater adverse impacts as a result. **There are only 74 Southern Resident killer whales remaining in the wild with critical habitat for both populations found in British Columbia coastal and internal waters**.

02 Discharge volumes

According to the Government of Canada: The volume of scrubber waste discharges on Canada's Pacific Coast **doubled between 2019 and 2022 from 44 million tonnes to 88 million tonnes.**

03 IMO Rules contradict Domestic laws and Multilateral Agreements

Many countries have domestic laws that are similar to those of Canada which act to protect fish habitats and endangered species. Further, other international agreements contain provisions for the enforcement of domestic laws. **As such, there are likely other countries that are potentially in violation of multilateral agreements by allowing the continued discharge of scrubber wastes.**

STAND.earth

Ideal MEPC outcome

In MEPC 81/5/4 and MEPC 82/5, the Committee has been urged to consider whether the use of scrubbers as an equivalent to low sulphur fuels is aligned with requirements outlined in regulation 4 of MARPOL Annex VI:

1) MEPC should adopt a resolution calling on shipping operators to **immediately stop the release of scrubber discharge wastes in areas identified for their sensitivity, vulnerability, or conservation value**.

2) IMO should encourage national maritime administrations to ban the discharge of scrubber waste within their jurisdictional waters and to stop approving scrubbers as an alternative compliance method for ships registered under their flags until a global ban is introduced.

3) MEPC should explicitly prohibit the use of scrubbers as a means of alternative compliance, thereby removing practices under MARPOL which are inconsistent with the obligations of IMO Member States under international treaty law, including human rights law;