

PUBLIC CONSULTATION

Potential accession to MARPOL Annex VI: Prevention of air pollution from ships

Highlights

49 submissions received:

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| <ul style="list-style-type: none"> • 13 industry organisations • 10 local councils • 3 academics • 2 NGOs | <ul style="list-style-type: none"> • 13 individuals • 6 health organisations • 2 community organisations • 1 ports' organisation |
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Should we accede?

- | | |
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| • In favour: | 44 |
| • Not opposed: | 1 |
| • Opposed: | 0 |
| • Not specified: | 4 |

Timing of accession

- **34** submitters want immediate accession
- **9** industry submitters seek lead time before accession, to enable compliance with strengthened Annex VI sulphur fuel / emissions regulations that come into force internationally on 1 January 2020
- **2** of those submissions sought a delay in accession to 2023, in order to insulate the domestic petroleum sector and carriers from the impact of the strengthened sulphur fuel regulations
- The possibility of implementing Annex VI requirements in a staged manner was identified as was restricting its application to SOLAS ships (large passenger and merchant vessels).

Key issues identified

Accession

- The majority of submitters recognised the need to address climate change and pollution in ports
- Accession would benefit New Zealand's international reputation and climate change engagement
- Alignment of domestic and Annex VI regulations was cited as a benefit.

Annex VI sulphur fuel / emissions regulations

- Regardless of accession, New Zealand will be increasingly affected as the global implementation of the strengthened Annex VI sulphur regulations approaches. Many submissions discussed associated impacts (positive and negative) and requirements (compliance and infrastructure)
- A key issue identified was the cost and availability of compliant low-sulphur marine fuel
- Port facilities will be required to receive waste residues from the operation of closed-loop scrubbers, which remove sulphur from ship exhaust
- The need for policies on the use of open-loop scrubbers that discharge residues into the marine environment was also identified.

MARPOL Annex VI submitters by sector and issues identified

Submitter type	No.	Timing of potential accession			Issues			Jan 2020 sulphur fuel requirements
		ASAP stated or implied	Lead time required	Not specified	Climate change	Health & local environs	Regulatory consistency & certainty	
Industry:								
• Carriers	4		3	1			3	4
• Shippers	1		1		1			1
• Petroleum	7		5	2	1			7
• Tourism	1					1		1
Ports	1			1	1			1
Health	6	6			6	6	2	1
Community	2	2				2		1
Local Government	10	8		2	8	9	5	5
NGOs	2	2			2	2	1	2
Academic	3	3			2	2	2	1
Individuals	13	13			11	12	3	5
Total	49	34	9	6	32	34	16	29

Appendix: MARPOL Annex VI submissions received

Submitter	Sector	Region	Support accession?
Andrew Jeffs <i>University of Auckland</i>	academic	Auckland	yes
Dr Bevan Marten <i>Victoria University of Wellington</i>	academic	Wellington	yes
NZ Centre for Planetary Ecology <i>Massey University</i>	academic	Palmerston North	yes
Interislander (KiwiRail)	carrier	Wellington	yes
International Container Lines Committee	carrier	Auckland	not specified
New Zealand Shipping Federation	carrier	Wellington	not specified
StraitNZ Bluebridge Limited	carrier	Wellington	not specified
Banks Peninsula Community Board	community	Akaroa	yes
Picton Air Quality	community	Picton	yes
Auckland Regional Public Health Service	health	Auckland	yes
Bay of Plenty District Health Board <i>Toi Te Ora Public Health</i>	health	Bay of Plenty	yes
Canterbury District Health Board	health	Christchurch	yes
Hawke's Bay District Health Board	health	Hawke's Bay	yes
Ministry of Health	health	Wellington	yes
Nelson Marlborough District Health Board	health	Nelson	yes
Auckland Council	local government	Auckland	yes
Bay of Plenty Regional Council	local government	Tauranga	yes
Environment Canterbury	local government	Canterbury	yes
Environment Southland	local government	Invercargill	yes
Greater Wellington Regional Council	local government	Wellington	yes
Marlborough District Council	local government	Marlborough	yes
Nelson City Council	local government	Nelson	yes
Northland Regional Council	local government	Northland	yes
Tasman District Council	local government	Richmond	yes
Generation Zero	NGO	National	yes
WWF-New Zealand	NGO	Wellington	yes
Blended Fuel Solutions NZ Ltd	petroleum	Te Horo	not specified
BP Oil New Zealand Limited	petroleum	Auckland	yes
Coastal Oil Logistics Ltd	petroleum	Wellington	yes
Methanex Corporation	petroleum	New Plymouth	not specified
Mobil Oil New Zealand Limited	petroleum	Auckland	not opposed
Refining NZ	petroleum	Auckland	not specified
Z Energy	petroleum	Wellington	yes
Port Company CEO Group	ports	National	Yes
Alan Mills	individual	Opotiki	Yes
Angele Toomey	individual	Hutt	yes
Brian Wheeldon	individual	Auckland	yes
Florian Burch	individual	Auckland	yes
Jenny Easton	individual	Nelson	yes
John Riding	individual	Wellington	yes
Josh Smith	individual	Australia	yes
Karen Wealleans	individual	Auckland	yes
Lorraine Steele	individual	Opotiki	yes
Mark Watson	individual	Christchurch	yes
Mesha Prathamesh Bhaswande	individual	Wellington	yes
Sarah Lorraine Thomson	individual	Auckland	yes
Vladimir Stoilov	individual	Auckland	yes
New Zealand Shippers Council	shippers	National	yes
Real Journeys	tourism	Milford	yes