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# SUBMISSION ON NEW ZEALAND ACCEDING TO MARPOL ANNEX VI

***WWF-New Zealand***

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**WWF-New Zealand is part of the international environmental organisation WWF (World Wide Fund for Nature).**

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## ***Introduction***

MARPOL Annex VI (**Annex VI**) is an important component in cutting shipping emissions. We are grateful for the opportunity to take part in this process.

WWF-New Zealand is one of the world's largest and most respected independent conservation organisations, with more than five million supporters and a global network active in over 100 countries. We work to build a future where people thrive in harmony with nature. Here, we work to turn New Zealanders passion for our natural world into action.

## ***Improving New Zealand credibility and influence on climate policy (Q1)***

Acceding to Annex VI will be highly likely to improve our credibility at the International Maritime Organisation (**IMO**) and other international fora.

Annex VI is a key instrument for addressing shipping emissions. For New Zealand to meet its ambition to be a global leader on climate change, it is important that New Zealand positively influence climate change policy at the IMO. Acceding to Annex VI is a key part of building our credibility when it comes to shipping issues.

Importantly, this is likely to have an impact on our credibility in international fora beyond the IMO. While shipping and aviation emissions are generally not formally addressed under the United Nations Framework Convention on Climate Change (**UNFCCC**), our experience is that they are consistently discussed in the margins of the formal UNFCCC negotiations. What is conveyed through these discussions significantly influences how states perceive each other and interact with each other within the formal UNFCCC negotiations.

Shipping emissions are also a regular topic for side events and at other non-IMO, non-UNFCCC international climate meetings.

New Zealand acceding to Annex VI would therefore be likely to improve our credibility within the UNFCCC and other international fora.

## ***Protecting New Zealand's trade interests and advancing effective mitigation (Q2-Q4)***

We recognise that there will be costs associated with complying with SEEMP and EEDI requirements, but consider that these will be outweighed by the benefits – both in terms of emissions reductions (greenhouse gas and otherwise) and enhanced international credibility.

## ***Improving public health (Q5-Q8)***

Acceding to MARPOL Annex VI is likely to have significant public health benefits, particularly in urban areas near major ports.

We are not aware of any public health costs related to accession to Annex VI.

## ***Providing for easier movement of New Zealand flagged ships to other countries (Q9-Q12)***

We are not aware of any way that acceding to Annex VI will cause issues for New Zealand vessels visiting ports of other Party States. As set out at pages 6-7 of the Cabinet Paper, acceding to Annex VI is likely to make it easier for New Zealand ships to visit other Party states.

## ***Low sulphur fuel (Q13-Q30)***

It appears that only a small minority of New Zealand vessels will not comply with the new 0.5% sulphur fuel limit. Switching to compliant fuels is likely to have positive environmental outcomes.

## ***Other issues (Q33-Q37)***

We are not aware of any significant costs of acceding to Article VI for the domestic shipping sectors.

We know of no other issues not identified elsewhere.

## ***Indicative timeline (Q38)***

The indicative timeline is reasonable, or arguably conservative.

There is no reason for further delay. Annex VI was first adopted in 1997 and entered force in 2005. It was amended in 2008, and the amendment entered force in 2010. 91 Party States have already acceded to Annex VI, including some of New Zealand's major trading partners and comparator states.

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