

30 January 2019

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To whom it may concern;

MARPOL Annex VI Consultation

I write to express Environment Canterbury's support for the proposal regarding New Zealand's signing of Annex VI to the International Convention for the Prevention of Pollution from Ships (MARPOL).

Environment Canterbury has a role in monitoring and regulating ambient air quality in the Canterbury region. However, we cannot regulate air pollution from ships because the Resource Management (Marine Pollution) Regulations 1998 permit discharges to air from the normal operation of a ship and prevent Environment Canterbury from including rules relating to these discharges in its Regional Coastal Plan, which manages activities in the Coastal Marine Area. The Canterbury Air Regional Plan does not have jurisdiction over activities in the Coastal Marine Area, only over activities on land.

Environment Canterbury is regardless concerned about the emission of pollutants that are harmful to public health, and contribute to climate change. This international treaty would be a positive step towards improving these outcomes because ships burning heavy fuel oil with a high sulphur content would need to switch to low sulphur fuel when in New Zealand.

We have had concerns raised with us by both the Lyttelton and Akaroa communities regarding emissions from ships potentially affecting the ambient air concentration where people live. In 2016, we monitored air quality in Lyttelton and found the concentrations of sulphur did not exceed the national guidelines. However, Annex VI accession would support ambient air quality around our ports and harbours to remain within the health-based National Environmental Standards for Air Quality and support reducing carbon emissions. This has long term benefits for Canterbury.

We would like to thank you for your work on this, and for the opportunity to provide feedback. We look forward to working closely with you again in the future.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Katherine Trought', is written over a light blue horizontal line.

Katherine Trought
Acting Chief Executive