



April 23, 2001

Mr. William A. O'Neill
Secretary General
International Maritime Organization
4 Albert Embankment
London SE1 7SR

Dear Secretary O'Neill,

On behalf of Bluewater Network and the following 28 organizations, we urge the International Maritime Organization (IMO) to immediately initiate a full-scale program to control and reduce greenhouse gas emissions from the world shipping fleet in order to minimize the industry's contribution to global warming and its potentially catastrophic environmental consequences. We also strongly encourage the IMO to establish a second tier of emissions limits within Annex VI to significantly curtail nitrogen oxide (NOx) emissions and strengthen fuel sulfur standards to reduce sulfur oxide (SOx) emissions, both major sources of air pollution and acid rain. Finally, we request that the IMO set standards for additional criteria air pollutants not currently included in Annex VI, such as hydrocarbons (HC), particulate matter (PM), airborne toxics and carbon monoxide (CO).

Greenhouse gas emissions from international shipping make a significant contribution to the increasingly more apparent and severe problem of global warming. Greenhouse gas emissions from the global fleet are expected to increase in the next two decades as international trade expands, driving the demand for larger, faster ships that consume more fuel than today's fleet. Without corrective action, by 2020 greenhouse gas and criteria air pollutant emissions from ships are predicted to rise by 38 to 72 percent due to increased bunker fuel consumption, according to the IMO's own study of greenhouse gas emissions from the global shipping fleet.

The IMO study identified a number of state-of-the-art technical and operational measures that together could cut emissions of the primary greenhouse gas, carbon dioxide (CO₂), from the world fleet by more than half over the next two decades. Optimizing hull and propeller design, modernizing power plants, utilizing higher quality fuels, slowing vessel speeds and incorporating weather-routing procedures were measures recommended to begin reducing greenhouse gas emissions from ocean-going vessels. Implementing a combination of technical measures throughout the global fleet could achieve a CO₂ emission reduction of nearly one-third (28.2 percent). A fleetwide ten percent speed reduction alone could reduce CO₂ emissions by nearly one-fourth (23.3 percent). We urge the IMO to begin implementing these CO₂ reduction measures in the world fleet as soon as possible.

In addition to reducing greenhouse gases, we strongly urge the IMO to implement policies to reduce criteria air pollutant emissions from the shipping industry. The current Annex VI standards are far weaker than what could be achieved utilizing best available marine diesel engine control technologies and fuels. Not only are the limits on NOx emissions and fuel sulfur far too lenient, but Annex VI completely fails to regulate hydrocarbons, particulate matter, airborne toxics and carbon monoxide.

While NOx and SOx emissions from ships tend to accumulate in specific coastal areas, the environmental problems associated with these emissions are truly global in scope. NOx contributes to global warming as it forms ground-level ozone, a heat-trapping greenhouse gas.



Together, SO_x and NO_x are the major precursors to acidic deposition (acid rain), which is associated with the acidification of soils, lakes, and streams, accelerated corrosion of buildings and monuments, and reduced visibility. Acid rain that destroys crops in one part of the world can impact the food supplies that would have been exported to another.

Because the Annex VI NO_x limits are so close to the current average uncontrolled NO_x emission levels, the U.S. Environmental Protection Agency (EPA) calculated that the contribution of Category 3 marine engines to world NO_x inventories is not expected to be greatly reduced by Annex VI standards. As a result of this finding and advances in NO_x emissions reduction technology, we urge the IMO to substantially strengthen the standards by setting a second tier of NO_x limits at levels 90 percent below Annex VI standards.

Substantial NO_x reduction from marine diesel engines can be achieved through primary and secondary treatment methods, such as Selective Catalytic Reduction equipment. This and other NO_x-reduction systems for marine diesel engines are now proven in the marine environment, so no major impediments remain to prevent the global shipping fleet from adopting these technologies.

Annex VI also achieves little, if any, progress towards controlling fuel sulfur and sulfur oxide (SO_x) emissions. For example, an EPA study failed to discover any samples of bunker fuels currently in use in the U.S. that exceed the Annex VI sulfur standard of 4.5 percent. In fact, most samples found fuel sulfur to be at levels far lower than the IMO Annex VI cap level.

Based on this finding, we believe it is entirely realistic to set maximum fuel sulfur content standards at 1.5 percent, with further reductions to be implemented on a phased basis; and to cap maximum fuel sulfur at levels of 0.50 percent in SO_x Emission Control Areas. In addition, we urge the IMO to conduct a feasibility study to determine the lowest achievable fuel sulfur levels within reasonable economic parameters.

We also urge the IMO to support the United States' request to consider setting limits for hydrocarbons and particulate matter. Because HC emissions may increase as NO_x limits are tightened, capping HC emissions would avoid emissions backsliding. A similar trade-off exists between NO_x and PM controls. Many U.S. and international agencies have designated diesel PM as a potential or probable human carcinogen, so these emissions should be also be capped. Finally, the IMO should inventory and control carbon monoxide and airborne toxic emissions.

In order to address the international shipping industry's emissions of greenhouse gases, NO_x and SO_x, and other criteria air pollutants, we strongly urge the IMO to immediately:

1. Establish a schedule for setting greenhouse gas emissions limits for ships;
2. Convene a Blue Ribbon Team of naval architects and engineers to help the shipping industry implement the greenhouse gas reduction measures outlined in the IMO greenhouse gas emissions report;
3. Establish a second tier NO_x emissions limits for marine diesel engines that are 90 percent more stringent than Annex VI standards;
4. Establish a second tier of fuel sulfur content standards capped at 1.5 percent or lower, except in SO_x Emission Control Areas where the limit should be 0.50 percent, and conduct an economic feasibility study on lowering sulfur fuel contents to the lowest achievable value; and,



5. Establish emissions caps on hydrocarbons, particulate matter, airborne toxics and carbon monoxide.

We appreciate your consideration of this petition, and request that this letter be broadly circulated to member states, non-governmental organizations (NGOs) and other interested parties at MEPC46.

Sincerely,

Russell H. Long, Ph.D.
Executive Director
Bluewater Network

Teri Shore
Campaign Director
Bluewater Network

Cc: Koji Sekimizu, Director of the Marine Environment Division, International Marine Organization
Joe Angelo, Director of Standards, U.S. Coast Guard
Christine Todd Whitman, Administrator, U.S. Environmental Protection Agency
Rob Brenner, Acting Assistant Administrator for Air, U.S. Environmental Protection Agency
Dan McGraw, Assistant Administrator for International Activities, U.S. EPA
Bryan Wood-Thomas, Senior Marine Policy Advisor, U.S. EPA
Jean-Marie Revelt, Environmental Protection Specialist, U.S. EPA

Signatory groups:

John Knox
Executive Director
Earth Island Institute
San Francisco, CA

Brent Blackwelder
President
Friends of the Earth
Washington, DC

David Hunter
Executive Director
Center for International Environmental Law
Washington, DC

Michelle C. Kremer, Esq.
Deputy Executive Director/
Legal Director
Surfrider Foundation
San Clemente, CA



Sally Ann Lentz
Executive Director
Ocean Advocates
Clarksburg, MD

S. Jacob Scherr
Director, International Programs
Senior Attorney
National Resources Defense Council
Washington, DC

Gerald H. Meral, Ph.D.
Executive Director
Planning and Conservation League
Sacramento, CA

Dave Phillips
Executive Director
International Marine Mammal Project
San Francisco, CA

Jonathan Kaplan
SF BayKeeper/Acting Executive Director
WaterKeepers Northern California
San Francisco, CA

Drummond Pike
President
Tides Foundation
San Francisco, CA

David Godfrey
Executive Director
Caribbean Conservation Corporation &
Sea Turtle Survival League
Gainesville, FL

Alan Berger
Executive Director
Animal Protection Institute
Sacramento, CA

Patricia R. Lane
Director, Program Management and Regulatory Affairs
Wildlife and Habitat Protection Section
Humane Society of the United States
Washington, DC



Kirsten Moller
Executive Director
Global Exchange
San Francisco, CA

Juliette Majot
Executive Director
International Rivers Network
Berkeley, CA

Pepper Fernandez
Chief Operating Officer
Sea Shepherd Conservation Society
Malibu, CA

Don White
President
EarthTrust
Oahu, HI

Sharon Sue White
President
Greenpeace Foundation
Oahu, HI

Nina Bell
Executive Director
Northwest Environmental Advocates
Portland, OR

Denny A. Larson
Northern California Regional Director
Communities for a Better Environment
San Francisco, CA

D. Wick Pancoast
Director
Borneo Project
Berkeley, CA

Alfredo Quartro
Co-Director
Mangrove Action Project
Seattle, WA

Todd Steiner
Director
Sea Turtle Restoration Project
Forest Knolls, CA



Jaana Cutson
Hudson River Sloop Clearwater
Poughkeepsie, NY

Gary Cook
Director
Russian/American Environmental Exchange Program
Siberia, Russia

Fran Peavey
Friends of the Ganges
Oakland, CA

Fran Recht
President
Oregon Shores Conservation Coalition
Depoe Bay, OR

Dave Galt
Director of Environmental Programs
Long Island Soundkeeper
Norwalk, CT