



**Environmental NGO recommendations on
COM (2002) 595 as regards the sulphur content of marine fuels
5 September 2003**

The European Environmental Bureau, the European Federation for Transport and Environment, Seas at Risk, Bellona Europa and the Swedish NGO Secretariat on Acid Rain believe it is highly important to reduce major health and environmental impacts caused by air pollution from sea going ships, by:

- *reducing the sulphur content of marine fuel to 0.5 per cent in European seas*
- *setting a maximum sulphur content of 0.2 per cent in Community territorial seas, including ports*
- *improving the sampling and analysis of marine fuels in combination with high penalties for violators*

Unless action is taken, ships' emissions of sulphur dioxide will grow so that by 2010 they will amount to between 2.8 and 3.3 million tonnes, i.e. approximately three quarters of those from all EU land based sources. If maritime transport is to become the more sustainable mode of transport the Commission envisions it to be, it needs to significantly reduce its contribution to air pollution.

The environmental NGOs welcome the Commission's declared intention to introduce measures aimed at combating emissions of sulphur dioxide (SO₂) from seagoing ships. However, the action proposed by the Commission will only result in total SO₂-emissions reductions from ships of less than ten per cent, as compared to their emission levels in the year 2000, which is clearly inadequate.

In order to protect human health and the environment, significant additional cuts in European SO₂-emissions are necessary. Such reductions are also needed for the Community to achieve the interim environmental objectives for 2010 as stated in directive 2001/81/EC on national emission ceilings for certain atmospheric pollutants. Between 1990 and 2000, emissions of SO₂ from land-based sources in the fifteen EU member states came down by more than 60 per cent, and by 2010 land-based emissions are expected to have come down by 75-80 per cent. In contrast, over the last ten years, SO₂-emissions from seagoing ships in European waters increased by nearly 30 per cent, from 2 to 2.6 million tonnes. If nothing is done, ships' emissions will rise by 10-30 per cent during the next ten years, which would mean that by 2010 they would be equivalent to more than three-quarters of the EU total for SO₂ from land-based sources.

Air pollutants such as SO₂, nitrogen oxides (NO_x), and particles (PM), or their secondary products, are of a transboundary nature, i.e. they can be transported over hundreds and even thousands of kilometres. Therefore measures to reduce these emissions should preferably be as geographically wide-ranging as possible, and at least EU-wide. Although some well-known problems related to sulphur pollution (i.e. acidification) are more severe in northern Europe, emissions of SO₂ and PM contribute to many serious health and environmental problems, which are more or less acute virtually all over Europe. Attainment of EU health and environmental objectives, as laid down in e.g. the EUs Fifth and Sixth Environmental Action Plans, makes further significant cuts in emissions of SO₂ and PM necessary. Moreover, ship emissions are estimated to contribute between 20 and 30 per cent to the air concentrations of secondary inorganic particles in most EU coastal areas. The high concentration of population in the coastal regions makes it necessary to take additional measures to further reduce emissions in coastal areas.

Additionally, if maritime transport is to become a more sustainable mode of transport - as envisioned in e.g. the Commission's Transport Policy White Paper - it needs to significantly reduce its contribution to air pollution.

This requires emission reductions that are significantly more substantial than the one foreseen in the current proposal, i.e. reductions of at least 80-90 per cent by 2008-2010.

Consequently, the environmental NGOs fully supports the intentions of the amendments adopted by the European Parliament, to further lower the sulphur content (from 1.5 to 0.5 per cent) in a second stage, and also extend the region in which these requirements shall apply to the southern sea areas (the Mediterranean and the north-eastern Atlantic). However, we see no legitimate reason for delaying the entry into force of these measures - to achieve these reductions we need to start as soon as possible.

In view of the inadequate proposal by the Commission, we have outlined a proposal which we feel is necessary to achieve these objectives. This proposal requires:

- setting a maximum limit on the sulphur content of marine fuels of 0.5 per cent, and applying this to all ships in all Community sea areas, as from six months after the entry into force of the directive (i.e. probably by late 2004 or early 2005). In this way reductions of annual SO₂-emissions from ships of approximately 80 per cent, as compared to 2000, can be attained;
- that marine fuels containing no more than 0.5 per cent sulphur are made available in sufficient quantities to meet demand in all Community ports as from 6 months after entry into force;
- setting a maximum limit of 0.2 per cent on the sulphur content of marine fuels used in Community territorial seas as well as at berth in Community ports as from 6 months after entry into force;
- that by 31 December 2008 the Commission should submit a report with proposals for revision of the limit values laid down for each fuel category, as well as proposals aimed at reducing other air pollutants from ships, including full specifications for marine fuels, along the lines of Directive 98/70/EC;
- that exhaust gas cleaning systems and other technological methods to limit SO₂-emissions should be considered primarily as a complement to the use of low sulphur marine fuels and should be only considered pending appropriate studies of their effects on the environment.

Effective monitoring and thus sampling is crucial for the implementation of the directive. In order to ensure that the sample provided by the bunker supplier actually contains exactly the same fuel as that delivered to the ship, we propose that the following precautionary provisions be laid down in the directive:

- that the sulphur content of all marine fuels sold in EC territory should be documented by the supplier on a bunker delivery note, signed by the representative of the receiving ship and sampling of the sulphur content should be done while delivered for use on board ships;
- that the directive should specify that a minimum of 50 per cent of the samples taken be checked for the sulphur content and highly dissuasive sanctions and penalties should be applied,
- that these checks and analyses of the marine fuel oil with bunker suppliers should be carried out in all Community sea areas from the date on which the relevant limit for maximum sulphur content in the fuel comes into force.

A complete background document "*Air pollution from ships*" – (including calculations on emission abatements implied by 0.5% S fuel content) – can be found at <http://www.acidrain.org/policy.htm#shipping> or <http://www.eeb.org/activities/air/main.htm> under *Shipping campaign*.

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