

MARINE ENVIRONMENT PROTECTION
COMMITTEE
66th session
Agenda item 6

MEPC 66/6/12
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**CONSIDERATION AND ADOPTION OF AMENDMENTS TO
MANDATORY INSTRUMENTS**

**Amendment to MARPOL Annex VI, regulation 13 —
Effective date for Tier III NO_x emission standards**

Submitted by the Community of European Shipyards' Associations (CESA)

SUMMARY

Executive summary: This document provides constructive comments on the proposed amendments to regulation 13 of MARPOL Annex VI (Effective date for Tier III NO_x emission standards) as set out in document MEPC 66/6/3

Strategic direction: 7.3

High-level action: 7.3.2

Planned output: 7.3.2.1

Action to be taken: Paragraph 9

Related documents: MEPC 66/6/3, MEPC 66/INF.4, MEPC 65/4/27, MEPC 65/4/7, MEPC 65/INF.10 and resolution MSC.285(26)

Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the *Guidelines on the organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.4/Rev.2) and provides comments on document MEPC 66/6/3.

2 MEPC 65 has approved an amendment to regulation 13 of MARPOL Annex VI to postpone the implementation date of NO_x Tier III standards within Emission Control Areas (ECAs) from 1 January 2016 to 1 January 2021.

Consequences for the shipbuilding and maritime equipment industry

3 Postponement of the entry into force date of Tier III NO_x standards from 2016 to 2021 will create undue uncertainty in the maritime regulatory framework. Shipbuilders, engine and other equipment manufacturers have heavily invested in R&D providing technology and processes that are fit for purpose.

4 These companies need legal certainty to act as "first movers" and investment security to be in the position to deliver the necessary reduction on NO_x and other emissions.

5 The decision of the postponement will have dire consequences for the design and shipbuilding process for ships currently on order and under construction. Ships are being designed, built and prepared with spaces to fit Tier III compliant equipment under the present regulatory timeframe.

6 Opposition to the proposed 2016 timeframe is based largely on an arbitrary rejection of one particular technology for reducing NO_x. There are many possible options, each with its own features (as demonstrated in document MEPC 66/INF.4 submitted by EUROMOT), such as Exhaust Gas Recirculation (EGR), and CESA cannot agree with one-sided criticisms being put forward.

7 Postponement would endanger innovation and employment in the shipbuilding industry, as well as pose a severe risk to health, including occupational health and the environment.

8 Environment and technology minded flag States should reconsider their positions for MEPC 66 to prevent such a detrimental amendment for the shipbuilding industry being adopted.

Action requested of the Committee

9 The Committee is invited to consider the information provided and take action as appropriate.
