To:

Mr Joel Dervain, Executive Secretary, AWA

Mr John Cooper, Director General, Concawe

David Loosley, Chief Executive, IMarEST

Mr Robert Ashdown, Secretary-General, IACS

Ms Unni Einemo, Director, IBIA Ltd

Mr Peter Müller-Baum, Secretary General, CIMAC

Mr Lars Lange, Secretary-General, IUMI

Mr Brian Sullivan, Executive Director, IPIECA

Mr Masayuki Nakano, Executive Director, JPEC

Mr Sam Megwa, Deputy Director and Chief Representative to IMO, OCIMF

Mr Trevor Blakeley, Chief Executive, RINA

23rd January 2020

Dear Sir/Madam

REDUCTION OF THE IMPACT ON THE ARCTIC OF BLACK CARBON EMISSIONS FROM INTERNATIONAL SHIPPING

The Clean Arctic Alliance is writing to you as the co-authors of the Joint Industry Guidance on "The supply and use of 0.50%-sulphur marine fuel" published in August 2019 on behalf of yourselves, the Joint Industry Project sponsors.

You will be aware that Germany and Finland have submitted to IMO the results of a measurement campaign analysing the impact of fuel oil quality on Black Carbon emissions (in PPR 7/8). The results of the study "clearly indicate that new blends of marine fuels with 0.50% sulphur content can contain a large percentage of aromatic compounds which have a direct impact on Black Carbon emissions." Indeed the study "demonstrated that the combustion of fuels with higher aromatic content emits higher concentrations of BC. New hybrid fuels with 0.50% sulphur content used in the study contained a high proportion of aromatic compounds in a range of 70% to 95%, which resulted in increased BC emissions in a range of 10% to 85% compared to HFO and in a range of 67% to 145% (a factor of 2.45) compared to DMA."

Furthermore, in Table 2 of the Annex to PPR7/INF 15 (which was submitted by Canada, Finland, Netherlands and the Republic of Korea and summarizes the outcomes of a two-day technical workshop on black carbon emissions from international shipping held in Helsinki in September 2019) it is noted that workshop participants "agreed that for it (i.e. a HFO ban with a switch to distillates or other cleaner fuels) to be effective as a black carbon control policy it 'must prohibit fuels with high aromatic/low hydrogen content, prohibit VLSFO, and prohibit desulfurized residual fuels'."

The Joint Industry Guidance on the supply and use of 0.5% marine fuel, published in August 2019, makes no mention of low sulphur fuel blends containing high levels of aromatic compounds nor of an increase of black carbon emissions of potentially up to 2.45 times that of the distillate DMA.

At a time of climate crisis, especially in the Arctic where the impact of black carbon emissions is many times magnified; and in the context of IMO's intensive work on climate mitigation, including its nearly ten years of effort towards reducing BC emissions from shipping, we the undersigned seek urgent clarification from you on the following:

1. Were you aware that these new low sulphur heavy fuel blends had higher aromatic content?
2. Were you aware of the link between higher aromatic content in fuels and higher BC emissions?
3. If the answer to the above questions is "yes", then why did you not immediately seek to halt the production of these fuels and alert the IMO?

We write to you because it's hard to see how experts in marine fuels like yourselves could not have been aware of the elevated aromatics in these new fuels and of the link between aromatics in fuels and black carbon emissions, and we believe an explanation from industry and refiners is urgently needed.

We welcome your response to these questions and in the meantime will continue to push for urgent action at the International Maritime Organization (IMO) to reduce black carbon emissions, especially those impacting the Arctic.

Yours sincerely

Dr Sian Prior

Lead Advisor

Clean Arctic Alliance

The Clean Arctic Alliance is a coalition of 18 non-profit organisations which includes members of the Clean Shipping Coalition, Friends of the Earth International, Pacific Environment and WWF which have Consultative Status at the IMO.