

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



10<sup>th</sup> February 2020

Dear Sir/Madam

**REDUCTION OF THE IMPACT ON THE ARCTIC OF BLACK CARBON EMISSIONS  
FROM INTERNATIONAL SHIPPING: VLSFO and black carbon**

The Clean Arctic Alliance (CAA) notes the collective and individual responses from the co-authors of the Joint Industry Guidance on “The supply and use of 0.50%-sulphur marine fuel”, to our letter of January 23rd.

CAA agrees that the IMO’s Pollution Prevention and Response (PPR) Sub-Committee is an appropriate forum to progress debate on the issue of black carbon emissions from the use of marine fuels. Indeed, this is why CAA members have submitted two documents for consideration during the forthcoming PPR meeting.

The IMO response to the threat posed by black carbon emissions has not however kept pace with the climate changes being experienced globally. It has been more than 12 years since information on the impact of black carbon emissions was raised at the IMO, and nearly nine years since a work plan was developed to investigate appropriate control measures to reduce the impact of black carbon emissions from international shipping. In all that time not one single action has been taken to actually reduce black carbon emissions.

PPR is not the only forum for this discussion. The intergovernmental Arctic Council - which addresses issues faced by the Arctic governments and the indigenous people of the Arctic - has already agreed to an ambitious target to reduce black carbon emissions by 25 to 33% below 2013 levels by 2025. In addition, in 2019, the Council called on Arctic operators to develop and report on measures and best practices to reduce particulate matter and black carbon emissions from shipping as a matter of urgency.

Next week, IMO Members have an opportunity at PPR 7 to shift their work on black carbon emissions up a gear; it’s urgently needed. Information on the conclusions of the 6th International Council on Clean Transportation technical workshop on marine black carbon emissions, which identified six appropriate

black carbon control policies, has been submitted to PPR. Participants agreed that for a black carbon control policy to be considered effective, it “must prohibit fuels with high aromatic / low hydrogen content, prohibit VLSFO, and prohibit desulfurized residual fuels”. Included are control policies for black carbon emission limits, and a heavy fuel oil ban with a switch to distillate fuel or cleaner fuels. In addition, environmental groups with consultative status have submitted a call for urgent action to ensure that ships operating in the Arctic switch to distillate or cleaner fuels, and that a global rule prohibiting the marketing of fuels with high black carbon emissions is developed.

At a time when the climate crisis is topping political agendas worldwide, and every sector is being set targets to reduce carbon dioxide and black carbon emissions, it would be unparalleled folly for the marine fuel sector to develop and market a product that takes black carbon emission reductions in the opposite direction.

We are also extremely concerned that new products are entering the marine fuel market when basic data on the composition of the fuel blend is unavailable and when there is little, if any, data available on the black carbon emissions associated with their combustion. Your organisations state that these fuels are likely not to produce more black carbon, but provide no evidence to support this. We stand by the concerns identified in the research submitted to PPR 7 by Germany and Finland which clearly shows “that the combustion of fuels with higher aromatic content emits higher concentrations of black carbon” and identifies that the “tested 0.5% sulphur fuels were ordered as possible sample mixtures from refinery-streams most likely to be used in 2020”.

Whatever the market share of highly aromatic blends within the overall VLSFO market, we believe that members of the marine fuel industry have a professional duty to alert the appropriate authorities at both national government level and at the IMO, when a situation arises where members are developing fuel types that would contradict established policy efforts to reduce black carbon - especially given that many of your own websites claim that you take climate change seriously.

What is crucial is that every possible effort is made to ensure the shipping industry reduces its climate impact and that new fuels contribute to this objective and not work against it. In closing, we have three questions for you.

1. Will you work with us to ensure that all fuel parameters and data that are likely to affect emissions are made public, and in the case of fuels that are still in development before they are brought to market?
2. Will you work with us to ensure that no new fuel placed on the market results in increases in black carbon or other air pollutants?
3. Will you work with us to expedite measures to reduce black carbon emissions from the burning of existing fuels?

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.

**The Clean Arctic Alliance:** Alaska Wilderness League | Bellona | Clean Air Task Force | Danish Ecological Council | ECODES | Environmental Investigation Agency | European Climate Foundation | Friends of the Earth US | Greenpeace | Icelandic Nature Conservation Association | Nature And Biodiversity Conservation Union | Ocean Conservancy | Pacific Environment | Seas At Risk | Stand.earth | Surfrider Foundation Europe | Transport & Environment | WWF  
is campaigning to ban heavy fuel oil (HFO) from Arctic shipping [www.HFOfrearctic.org](http://www.HFOfrearctic.org)