



7 February 2019

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Ask For: Sarah Brand

Ministry of Transport
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Dear Sir/Madam

MARPOL Annex VI Consultation

The Marlborough District Council (Council) administers a diverse region and has key priorities of looking after the environment, building and maintaining our infrastructure and investing in economic development to provide for a quality, desirable lifestyle and wellbeing for our communities and a healthy natural environment. The Council therefore supports a recommendation that New Zealand accedes to Annex VI to the International Convention for the Prevention of Pollution from Ships (MARPOL).

The coastal port town of Picton and the Marlborough Sounds are the areas within the region in which there is the greatest concentration of shipping activity. So while the Council has considered the various questions posed by the Ministry of Transport in its consultation document, the Council considers four main points of focus to support its recommendation for New Zealand's accession to the Annex.

1. *Public Health* – The effects of gaseous and particulate pollutants on human health are now widely known with the strongest effects being on respiratory and cardiovascular systems as well as carcinogenic effects. As such a reduction in those pollutants will result in reduced adverse public health effects and costs. This will be particularly felt in the port town of Picton which is the region's interisland shipping gateway for freight and passengers, as well as logging exports and increasingly a destination port for the cruise ship tourism industry.
2. *Ecosystem Health* – The Marlborough Sounds is a unique area of New Zealand and its ecosystems are highly valued and should be protected. A reduction in emissions would result in the reduction of adverse effects on the area's ecosystems through process such as acidification and deposition of toxins including heavy metals and dioxins.
3. *Greenhouse Gas Emission Reduction* – Similar to health effects, shipping emissions have been shown to have a climate change impact. The Council has recently initiated a Climate Change Integration Programme showing the emphasis the Council is placing on this area. Therefore the Council supports an international initiative such as Annex VI to reduce greenhouse gas emissions which contribute to climate change.
4. *Investment Certainty* – The accession to Annex VI would provide investment certainty to domestic ship owners and fuel suppliers and greater motivation for operators and port companies to invest in technology and practices that will reduce these pollutants be that through new low emission, energy efficient fleets, on-shore power availability, or scrubber technologies.

The Marlborough District Council is grateful to the Ministry of Transport for the opportunity to comment on the Consultation on MARPOL Annex VI: Treaty to reduce air pollution in ports and harbours. The Council believes there will be strong benefits for its region and recommends that New Zealand accedes to the Annex.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'S Brand', is positioned above the printed name.

**DR SARAH BRAND
ENVIRONMENTAL SCIENTIST
MARLBOROUGH DISTRICT COUNCIL**