

Submission on *MARPOL Annex VI*, 4 February 2019  
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It is a source of shame and embarrassment that New Zealand is not yet a signatory of MARPOL Annex VI, a key international agreement originally reached in 1997 (21 years ago!) and now covering 95% of the world's sea freight, but also a relief that we are now considering it.

We support ratification of Annex VI as soon as possible.

The descriptions of the reasons for adopting Annex VI described in the consultation document, namely Protecting New Zealand's trade interests and advancing effective mitigation measures; Providing for easier movement of New Zealand flagged ships to other countries; Promoting the interests of Pacific Island countries; Improving public health and regulating greenhouse gases; and Improving New Zealand credibility and influence on climate policy, seem comprehensive, fair, and balanced. We support them.

Many of these issues have been studied in depth in "Shipping and Air Pollution: New Zealand's Failure to Ratify MARPOL Annex VI", B Marten, Australia and New Zealand Maritime Law Journal 2016, whose conclusions we endorse.

We would only add that the situation of international transport emissions is even more important to address than outlined in the consultation document and further strengthens the case for New Zealand to focus on this source of emissions:

1. International transport emissions are likely to be required to be included in Nationally Determined Contributions at some point, possibly within a decade. So far, there has been no official word on how NZ's 1mt of shipping and 3.4mt of aviation emissions are to be handled within New Zealand's Zero Carbon Bill, the weakest option for which includes net zero CO<sub>2</sub> emissions by 2050. Planning for this needs to begin, perhaps by signalling a date for entry of international transport emissions into the ETS. This would push up the price of carbon and tend to favour shipping over aviation.
2. The cruise ship industry is growing rapidly (259,000 cruise visitors in the year to June 2018, up 34% in 3 years). We have no data on the average cruise length, but 14 days cruises from Sydney are popular, and each cruise passenger emits about 1100kg CO<sub>2</sub> per week, making the cruise industry a significant source of emissions (possibly 0.57mt CO<sub>2</sub>) in urgent need of regulation. To put it another way, each cruise visitor

emits as much in a fortnight as a typical New Zealander does in a whole year of driving. That's even without looking at the sulphur and nitrogen issues.

3. It is likely that there will be future calls to further improve the environmental standards of shipping, as is already happening in Europe for example (<https://worldmaritimenews.com/archives/269194/ngos-call-for-ban-of-scrubbers-in-european-ecas/>). Joining Annex VI will help New Zealand engage constructively with these developments.

Thank you for the opportunity to submit on the ratification of Annex VI.

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