



11 February 2019

MARPOL Annex VI submission,  
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**Ministry of Transport's consultation on MARPOL Annex VI: Treaty to Reduce Air Pollution in Ports and Harbours**

Nelson City Council (NCC) would like to support the submission lodged by the Nelson Marlborough District Health Board (NMDHB) and the Port Company CEO Group (PCCG) in relation to the Ministry of Transport's consultation on MARPOL Annex VI: Treaty to Reduce Air Pollution in Ports and Harbours.

MARPOL requires that fuels used in ships will contain no more than 0.5% sulphur rather than 3.5% (the current standard).

The NMDHB submission indicates that lower sulphur limits for marine fuels will reduce ship air pollution and improve health impacts such as premature mortality (34% reduction) and morbidity (54% reduction).

In particular NCC supports the Ministry of Health's findings that reduced emissions of harmful air pollutants will result in reduced:

- adverse health effects (and costs)
- reduced adverse effects on ecosystems
- greenhouse gas emissions and associated climate change impacts

Research indicates that emissions from ship traffic at Port Nelson constitute a significant portion of PM10 and PM2.5 in surrounding airsheds. A reduction in these emissions would aid in achieving compliance with the National Environmental Standard Air Quality 2004 and reducing associated health impacts.

The PCCG submission supports MARPOL and highlights the implications for the economy due to potential increases in freight costs and the need to access low sulphur fuels or install scrubbers. The submission seeks a delay to the proposed implementation date of MARPOL (1 January 2020) to allow improved accessibility to low sulphur fuel. This delay is supported by NCC and it is recommended that this matter is considered in the development of the new National Environmental Standard for Air Quality by the Ministry for the Environment.

Regards,

Rachel Reese JP  
Mayor of Nelson