



SEAS AT RISK

Implementing the Clean Ship Approach

*Closing the gap between what is possible and
what is required by law*

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Seas At Risk

An independent non-governmental federation of ngo's concerned with the protection and restoration of the marine environment.

14 Participant Organisations from Belgium, Denmark, Germany, Ireland, The Netherlands, Norway, Portugal, Sweden and the United Kingdom.

Involved in NSC since 1984.

OSPAR observer since 1992.

Involved in EMS / EU Maritime Policy.

Long-standing participant (via FOEI) in work of IMO.

Regular observer at NEAFC.

SAR objective (shipping)

International implementation of the “Clean Ship” approach, i.e. the use of vessels designed, constructed and operated in an integrated manner to eliminate harmful discharges, emissions and losses throughout their working life.

This to be achieved via stricter regulations, economic incentives, improved education & awareness, and the development of new technologies where necessary.





Overview of NSC process (1)

Esbjerg Declaration, Annex 3, §6.3 “Zero discharges”

“Recognising that existing regulatory standards are proving difficult to enforce, the Ministers AGREE:

- to pursue further research aimed at the *complete elimination* of intentional pollution of the marine environment by oil and other harmful substances;
- to study the concept of a more structural approach, including the *possibilities of a zero discharge regime*, improved enforcement in ports, mandatory disposal of wastes in the case of excessive waste stocks, and the financing of such disposal (directly or indirectly); and
- to take concerted action to provide IMO with the results of such studies which would provide the basis to work within IMO towards more structural measures, such as waste prevention, recycling and closed loop processes in the conduct of shipping operations.”

Overview of NSC process (2)

Bergen Declaration §48(i)

Ministers recognised that progress within IMO and the EU was not enough and that “new approaches and mechanisms are needed”.

More specifically, the ministers agreed “to explore and develop the concept of vessels designed, constructed and operated in an integrated manner to *eliminate* harmful discharges and emissions throughout their working life (the Clean Ship approach)”.



Overview of NSC process (3)

Bergen Declaration §48(i) continued.

“This approach will address all vessel operations and possible impacts on the environment and consider amongst other strategies the use of recycling, waste prevention and closed-loop processes.”

“The first stage of this work, compiling a comprehensive specification of the parameters of the “Clean Ship” and establishing a system for monitoring progress towards fulfilment of the concept, will be reported on by 2004.”





Current shipping regulation (1)

Marine Litter

Annex V of MARPOL 73/78 prohibits the dumping of litter in the North Sea, but 20,000 tonnes of marine litter are dumped *by shipping* annually.

The 70% *direct fee* that is allowed under the EU port reception facility directive is a considerable incentive for ships to dump their waste at sea.



Current shipping regulation (2)

Air pollution

Annex VI of MARPOL 73/78 sets a global cap on the sulphur content of ship's bunker fuel at 4.5%, while the actual average sulphur content of bunker fuel is 2.7%.

Low quality bunker fuel is a persistent problem, leading to air pollution, marine pollution, engine problems and economic damage for shipowners

Will it be possible to enforce the 1.5% sulphur limit in SECAs effectively?



Current shipping regulation (3)

Oil Pollution

Every year hundreds of oil slicks are detected in the North Sea, which is a MARPOL 73/78 Annex I “Special Area”.

The level of fines for illegal discharges of oil are so low that ship operators consider it a calculated risk. (exception: US)



Current shipping regulation (4)

Tanker safety

Reaction after Erika & *Prestige*: phase-out of all single hull tankers. Double-hull tankers are more prone to corrosion and more difficult to inspect and maintain. Double-hull tankers will only result in safer shipping if they are combined with substantially enhanced maintenance & control.

Another reaction was to imprison the Captain, whereas guilt should lie with irresponsible owners who fail to maintain their vessels properly.

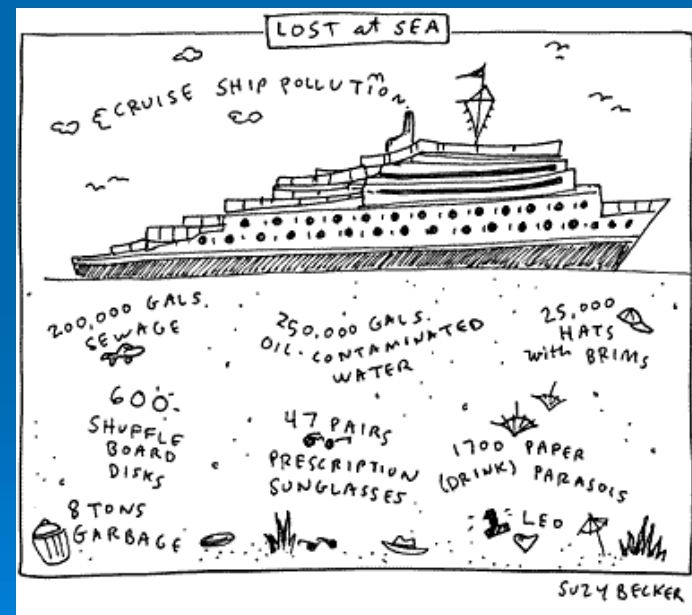


Current shipping regulation (5)

Poor Ratification

Annex IV of MARPOL 73/78 took 30 years to enter into force.

Non-ratification of international legal instruments governing shipping is common even amongst North Sea states.





Current shipping regulation (6)

Conclusions:

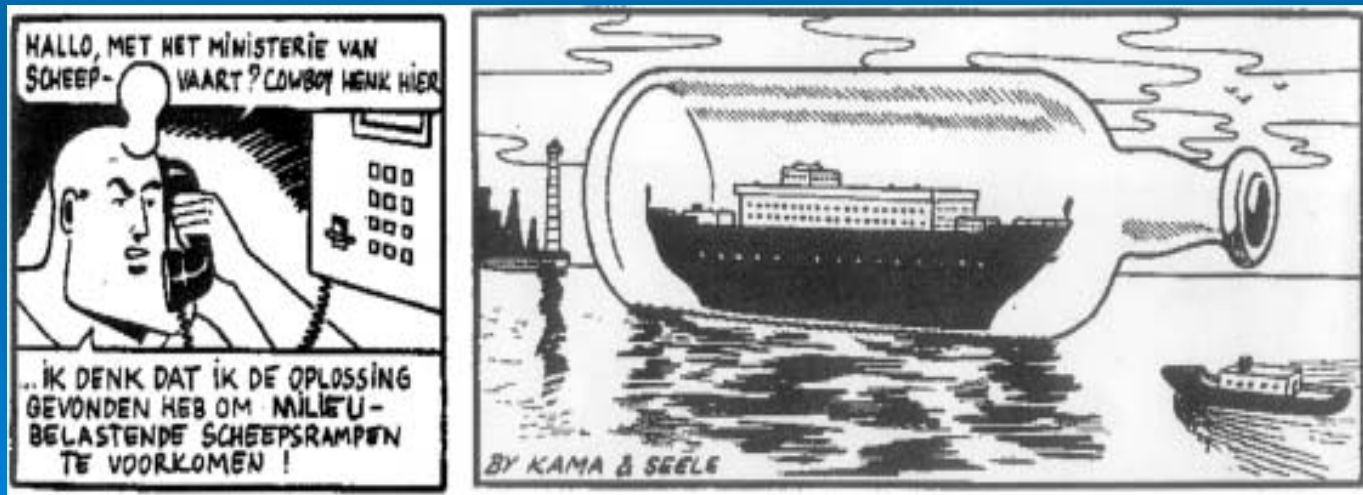
- Most regulation takes too long to enter into force
 - Targets are too weak, often accepting pollution at some level,
 - Many regulations are difficult to enforce.
-
- As long as it's not in my backyard ..



Beyond Esbjerg & Bergen

Ministers need to move beyond the rhetoric and promises of Esbjerg and Bergen and start the process of **implementing** the Clean Ship approach.

To be effective a combination of approaches is required.





Implementing the Clean Ship Approach

Step 1: Closing the Gap

The Clean Ship approach is *not* a magical solution, but a course towards sustainable Shipping.

Current Best Technologies and industry practice already take you a very long way down the Clean Ship road.

First step in implementing the Clean Ship approach:

Regulators must close the gap between regulatory standards and existing best available technologies and practices.





Implementing the Clean Ship Approach

Step 2: A new regulatory approach

To work most effectively regulations must be

- target driven (ie 1.5% global SOx cap)
- aim at eliminating pollution (the Clean Ship approach)
- simple to understand
- simple to enforce.

Quality operators will nearly always live by the rules, but only thorough and effective enforcement will ensure that everyone plays by the same rules.





Implementing the Clean Ship Approach

Step 3: New additional instruments

1. Economic **incentives**; properly harnessed the market can be a powerful force for change.
 - Financing technological **innovation** + the introduction of existing technology used in other sectors.
 - Seafarer **training** and awareness building; much of the pollution from shipping is caused by a lack of knowledge about the marine environment.



The Importance of Gothenburg

Gothenburg ministerial meeting will be the last in a long series of North Sea Conference events.

The ministers responsibility in respect of the Clean Ship is clear.

The draft Declaration lacks a strategy for implementation. It *touches* on education, innovations and incentives but *ignores* the vital issue of closing the gap between regulatory standards and existing best available technologies and practices.



The Importance of Gothenburg

Starting to close the gap

Seas At Risk is calling on Ministers to AGREE to:

Conduct a study to identify the gaps between present best available technology (BAT) /best environmental practice (BEP) and current regulatory standards.

Follow-up this study with proposals for the tightening of regulations (e.g. EU/IMO) to take full advantage of existing Clean Ship BAT and BEP.





Conclusion

Gothenburg 2006 is an ideal opportunity for North Sea ministers to show the world the course towards clean shipping.



Clear and firm decisions are needed!



SEAS AT RISK

