



21st January 2019

To whom it may concern

RE: MARPOL Annex VI Consultation

Generation Zero is New Zealand's largest youth climate organisation and is focused on providing future-oriented climate solutions for Aotearoa. We have a particular expertise in transport, and recognise that because of New Zealand's position- shipping is a key consideration as part of that.

Generation Zero is in strong support of New Zealand acceding to Annex VI of MARPOL believing that is overwhelmingly in the interests of New Zealand on the basis that it will:

- Give the correct signals to shipping and oil businesses allowing them to make future decisions with certainty and in line with the proposed Zero Carbon Act.
- Improve human health in our port cities and for workers.
- Improve environmental outcomes from reduced air pollution.
- Show New Zealand's continued commitment to climate action on an international stage.
- Create a new opportunity for New Zealand to develop low-sulphur fuel alternatives.

Furthermore there are numerous risks associated with New Zealand not acceding including:

- New Zealand continuing to be at odds with the practice over 96.59% of world's tonnage which creates an obstacle to free trade and engagement in IMO negotiations.
- New Zealand ports and shipping companies delaying the inevitable costs of transition and so being economically disadvantaged.
- Continued environmental and health impacts from air pollution in our port cities- which house the majority of New Zealand's population

In summary, any transition costs that come from New Zealand signing up are more than outweighed by the benefits- including the transition to a low-carbon economy. Because such changes are inevitable, New Zealand acceding at this opportunity thus provides greater certainty for relevant businesses as well as extends the timeframes that they have for such a transition.

If you have any questions or would like further information on Generation Zero's position on the accession to Annex VI or any of the matters contained in our submission, you can contact me directly at injury@generationzero.org.nz or at +64273186411.

Kind regards

Injy Johnstone on behalf of Generation Zero