

Survey for Annex VI: treaty to reduce air pollution in ports and harbours:

1. Your name, where you live (location is fine, we don't need your address)

Brent Yardley (Picton Air Quality), Marlborough Sounds

2. Do you think New Zealand should accede to MARPOL Annex VI?

Yes, I think New Zealand should accede to MARPOL Annex VI. Further, I think we need to implement a 0.1% sulphur limit for Fiordland and the Marlborough Sounds, and perhaps the whole country out to the EEZ.

3. Why do you think this?

0.1% sulphur has been the benchmark standard for MARPOL Emission Control Areas (ECA's), including Hawaii and Puerto Rico, Since 2015. Ports such as Sydney have also regulated outside of MARPOL and adopted the 0.1% standard. If New Zealand signs on to the MARPOL Annex VI provisions without implementing 0.1% sulphur limits, we are effectively positioning ourselves at the lowest standard globally.

Norway, in contrast, is presently implementing the 0.1% standard and moving to put in place zero emissions standard for its fjords by 2026. The increase in standards apparently being due to studies finding that cruise ship pollution in the fjords has resulted in air quality being hazardous to human health. Fiordland and the Marlborough Sounds clearly have similarly confined waterways to those of Norway and are also under increasing pressure from shipping traffic. Because of these similarities, it seems reasonable to conclude that the 0.1% ECA benchmark is a much more suitable standard to implement than the default global standard.

New Zealand has been slow to regulate emissions from shipping and as yet no rigorous studies of shipping's impact on air quality and health have been undertaken. The Ministry's consultation discussion paper for the Annex VI provisions pragmatically considers emissions regulation in terms of costs and benefits, but there is no data currently available to determine the cost to public health resulting from shipping emissions. At present, air quality in Picton is suffering significantly due to shipping with visible smoke plumes and foul sulphurous being observed every day of the week. At what cost to public health, we do not know.

It seems to me that the prospect of implementing the MAPOL Annex VI provisions presents an opportunity. In the current climate of concern around the burning of fossil fuels and its impact on the environment, it is important to be seen to be taking emissions management seriously and acting decisively in a manner consistent with the principles of best practice. Post-January 1, 2020, when the remainder of the world, outside of the American and European ECA's, have already cut their sulphur content by more than 80%, if we move, late, and only implement the lowest standard globally it can only further erode our standing as a clean, green country. This, I believe, is the cost-benefit equation that we should be investigating.

To illustrate how lax emissions controls are impacting the Marlborough Sounds I've included the picture below which was taken in the immediate vicinity of a large children's dinghy sailing regatta that was hosted only a couple of weeks earlier.



Sometimes we want to know a little bit more about what someone thinks. If this is the case with you, are you ok if we get in touch? What is the best way to do this? (please provide an email or phone number).

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If you need more information to assist you in preparing a submission, please contact Brian Nijman at b.nijman@transport.govt.nz or through the email address above.