



To
Mr. José Manuel Barroso
President
European Commission
Rue de la Loi 200
BE-1049 Brussels

Berlin, 1 September 2010

EU should support the stricter IMO regulation of the sulphur content in marine fuels in European ECAs

Dear President Barroso,

The signatories of this letter, representing various European environmental, health and labor associations, would like to express their deep concern at recent calls from certain (shipping) industry groups to weaken crucial marine sulphur limit regulations applying to European Emission Control Areas (ECAs). In their letter, the industry groups raise concerns about “negative consequences” with regard to the IMO emission standards for ECAs applying from 2015 which require the use of marine fuels with a maximum of 0.1 percent sulphur content.

The environmental groups and labor associations are deeply concerned about this open attack on existing regulations that are essential for our health and environment. In particular, the argument raised by sections of the shipping industry of so-called “negative impacts on the competitiveness of industries in the affected EU countries” lacks any evidence and proof. Moreover, the argument should be reversed: If all sea areas around Europe (e.g. the Mediterranean Sea, the Black Sea and the North-East Atlantic in addition to existing SECAs in the Baltic and North Sea) would be designated as Emission Control Areas (ECAs) –covering emissions of sulphur, NOx and PM – a situation of balanced competitiveness would be created, protecting the health of thousands of people, preserving the environment and safeguarding jobs.

In terms of preventing “negative consequences” for the shipping industry, it is from our viewpoint absolutely crucial to press for an eco-innovative ship industry in Europe. The IMO standards have been known for over two years now. They were strongly and publicly endorsed by the EU and were adopted unanimously by the IMO. More and more ship builders and owners have already reacted and invested in clean and efficient ship technologies - they would be punished by reverting to lower standards again. In economic terms, remodeling, retrofitting and optimizing existing ships will create not just a market niche but a growing sector within the ship construction field considering the large size and long lifetime of the current ship fleet and the need for more efficient ships and engines. In economic terms, that means securing existing jobs and creating new ones around the technical modernization and reconstruction of older ships to increase energy efficiency and reduce emissions.

The recent demand from some self-interested sections of the maritime industry to amend the IMO decision is unacceptable. The European Union has to clearly stand behind the

new 2015 sulphur limits. Bunker fuels used in shipping are essentially toxic waste products of the refinery industry. Conversion to the use of low sulphur fuels is environmentally necessary and long overdue. Their use also provides good incentives for fuel reduction and therefore is also an important step to reduce overall ship emissions.

We strongly urge the European Union to uphold and further support the IMO MARPOL decisions setting sulphur caps for designated ECAs as well as a global 0.5% limit in 2020. Even after the global regulation on sulphur comes into effect in 2020, shipping fuel will still contain around 500 times more sulphur than is allowed in road fuels in the EU today. For decades, the shipping industry has benefited from weak pollution regulations allowing them to pollute without paying.

The European Commission needs to provide the leadership and technical advice for EU member states to support the additional designation of all European sea areas as ECAs within the framework of the IMO. The successful joint proposal of the U.S. and Canada for the designation of a distance-to-shore ECA covering their West and East coasts (which was approved by the IMO in March this year) shows that the EU should follow such a comprehensive approach to create the same economic condition all around European sea areas. As it is however, the European Commission has not even started the necessary technical work to investigate the feasibility of distance to shore ECAs in Europe. Nor has a firm decision been announced on the delayed revision of the Sulphur in Marine Fuels Directive (2005/33/EC). The EU's support for the new IMO standards needs to be backed by action to incorporate them into EU legislation. This will also underpin port state authority to police the new regulations. The health and environmental benefits of coastal ECAs in Europe would be outstanding. Adjusted emission and fuel standards will help the shipping industry to develop more fuel and energy efficient ships and become a lead market for clean shipping.

Because of the cross cutting character of this issue we are also sending these letters to Commissioners Sim Kallas (Transport), Janez Potočnik (Environment), Connie Hedegaard (Climate), Antonio Tajani (Industry & Entrepreneurship), and Maria Damanaki (Maritime Affairs and Fisheries). In view of the public interest in this matter we are making a copy available to certain media.

Thank you for your attention to this important and urgent matter.

On behalf of the signatories of this letter,

Yours sincerely,



Olaf Tschimpke,

President NABU e.V. on behalf of the Soot free
for the Climate Campaign

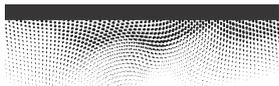


Jutta Blankau,

Regional head IG Metall Bezirk Küste (Industrial
Metal Workers' Union Coastal Region)

Supporting organizations

Environmental and health organizations:



SOOT FREE FOR THE CLIMATE

Soot free for the Climate Campaign



Friends of the Earth, Germany



German Environmental Aid, Germany



Verkehrsclub Germany



Nature and Biodiversity Conservation Union, Germany



World Wide Fund For Nature Europe



European Environmental Bureau, Europe/Brussels



Health and Environmental Alliance, Europe/Brussels



Transport and Environment, Europe/Brussels



Verkehrsclub Austria



The Clean Air Action Group (CAAG), Hungary



Air Pollution and Climate Secretariat, Sweden



Stichting Natuur en Milieu, Netherlands



Clean Shipping Coalition, Europe

Labor union organizations:



Bezirk Küste

IG Metall Bezirk Küste/ Industrial Metal Workers' Union Coastal Region, Germany



European Metalworkers' Federation, Europe/ Brussels



International Transport Workers' Federation



Ver.di, Germany



Fédération Générale des Mines et de la Métallurgie (FGMM-CFDT), France



Confédération générale du travail (CGT), France



Confédération française de l'encadrement - Confédération générale des cadres (CFE-CGC), France



Central Organisation of Industrial Employees in Denmark (CO-industri), Denmark



Metalliliitto / The Finnish Metalworkers' Union, Finland



Metal, Construction and Allied Workers' Federation / Union General de Trabajadores (MCA-UGT), Spain



General Workers Union, Malta