

**Statement at BLG11 from the delegation of the United States, 16 April 2007**

**Statement from the United States to the BLG 11 Meeting  
Introduction of US Paper BLG 11/5/15 - Proposal for new PM and SOx limits**

Thank you, Mr. Chairman

The importance of our work on this issue has grown as our understanding of the adverse impacts of high levels of particulate matter, ozone, and air toxics pollution has grown. Reductions in SOx emissions are also important, primarily due to the large reductions in direct and secondary particulate matter which can occur from deep reductions in SOx emissions. Inventory work on both a global and local basis continues to show that marine diesel engines are significant contributors to this pollution, and health studies confirm the impacts of those emissions on respiratory ailments and even premature mortality. There is growing pressure in a large number of countries to address these emissions, both because land-based sources are already subject to very stringent controls in many countries and because additional reductions can be obtained from marine diesel engines at comparatively low cost. It is essential for IMO to adopt meaningful long-term controls for these sources, to ensure a stable planning environment for ship owners and builders and to avoid a fragmentation of marine emission standards across the world.

Several proposals have been put forward for our consideration. In considering these proposals we should keep certain guiding principles in mind, namely, that the next set of international standards should maximize public health and environmental benefits, be cost-effective, and permit maximum compliance flexibility.

The proposed framework described in our paper is intended to strike the best balance between these critical principles. We believe this framework will provide the optimal combination that maximizes benefits at reasonable costs. This would be achieved by ensuring that advanced technologies are employed in those areas that have a demonstrated need, by setting meaningful performance standards, and by providing adequate lead time for each level of technology. In addition to

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addressing a serious environmental problem, this framework will provide long-term stability to the industry and avoid the fragmentation of air pollution standards for the marine industry around the world.

The PM and SO<sub>x</sub> framework we describe is a geographically-based program. Ships would be required to make use of advanced emission control measures only within certain defined areas. Outside of those areas, and particularly on the high seas, ships could continue to use higher sulfur residual fuel. This approach has the advantage of limiting the amount of time during which the ship would be required to use an emission control strategy and thus limiting the costs of the program for the shipowner, while focusing the benefits of lower pollution in the areas that have the greatest need for such controls. These geographic areas should be designated based on the recommendations from member states, and should make use of sound scientific analysis, with appropriate consideration given to the costs and benefits.

The proposed framework reflects a performance standards approach. This affords the greatest flexibility for ship owners and operators, who may choose to comply either through the use of low sulfur distillate fuel and/or the use of scrubbing or other technology. For those ships choosing to use low-sulfur distillates, we would have a situation where only 2 fuels are carried onboard – high-sulfur heavy-fuel oil and distillate. This contrasts with the situation today in the Baltic where some ships are faced with carrying 3 fuels: distillate, high-sulfur heavy-fuel oil, and lower sulfur heavy-fuel oil.

The effective dates and standard levels should be considered in parallel with the size and number of the defined geographic regions, as well as the availability of low sulfur distillate fuel for marine applications in that time frame, to ensure a sound program.

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There are many details yet to be worked out when considering the US proposal, including the appropriate level of the PM and SO<sub>x</sub> limits, the effective dates, and the criteria for geographic designations. However, it is our belief that the proposed framework strikes the proper balance between public health needs and the needs of the shipping industry.

We look forward to working with all delegations as we make the important decisions regarding how best to address this very important issue.

Thank you Mr. Chairman.