

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

Thank you, Mr. Chairman

When IMO adopted Annex VI in 1997, it was recognized that the Regulation 13 NOx limits were an important first step toward reducing the harmful health and environmental effects of diesel marine engines. While the standards themselves were not very stringent, the regulation and the NOx Code set in place a certification and compliance program that would prove to be the building blocks of the international program to control air pollution from marine engines.

As discussed during the introduction of the US position paper on PM and SOx, air pollution from ships is a global environmental issue, and is certainly of great concern in the United States. NOx emissions from ships are a significant contributor to ozone as well as secondary particulate matter in the US, and substantial reductions are necessary to achieve our clean air goals. As discussed during the introduction of the US position paper on PM and SOx, certain overarching goals should guide our considerations for the next level of NOx limits. The next set of international standards should maximize public health and environmental benefits and cost-effectiveness while permitting maximum compliance flexibility. We believe the framework for NOx controls described in our paper strikes the best balance between these goals.

In developing these proposals, the US consulted with a wide range of stakeholders, including the major engine manufacturers. During our discussions with Caterpillar, MAN Diesel, and Wartsila, we gained valuable insight regarding the current status of technology as well as the potential for the future reductions from the application of advanced systems. We also gained an appreciation for the importance of balancing environmental need with the development lead time

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necessary to bring new technologies to the market. We believe the US proposal weights these considerations in a reasonable manner.

The focus of our NOx proposal is emissions from vessels engaged in international trade. The NOx standards for new engines are targeted at any engine on a vessel that has a propulsion engine with per cylinder displacement above 30 liters.

For new engines, the U.S. NOx proposal consists of two tiers of standards. The Tier 2 limits, which could begin as soon as 2011, would provide moderate, near-term health and environmental benefits while providing the time for industry to plan for and apply advanced technologies for the long-term Tier 3 limits that will result in the substantial reductions in marine diesel NOx emissions – reductions that are needed in many areas of the world to ensure healthy air quality. We believe the Tier 3 limits could begin as soon as 2016 and could be achieved through the use selective catalytic reduction technology. This technology is already being used successfully on a range of marine diesel engines. A key aspect of this technology is its operational flexibility. Our proposal for Tier 3 limits applies only to those vessels powered by large displacement engines and is limited in application to specific geographic areas. If appropriate, this could be the same area as the PM/SOx control area outlined in the US paper discussed previously. This geographic component could reduce any operating costs associated with the use of aftertreatment systems while ensuring the greatest degree of NOx control in areas where a member state can demonstrate the environmental need.

We are also proposing NOx limits for large displacement engines built before the year 2000, the effective date of the existing standards. These standards call for a nominal 20 percent reduction in NOx emissions from engines. These standards would be achievable through engine-based changes and would not require the use of advanced controls. The exact limits may be

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linked to engine platforms, since the potential for controls on 4-stroke engines may not be the same as those for 2-stroke engines. These standards would apply only to large-displacement engines used on ocean-going vessels. Consistent with our discussions at BLG 10 and the Oslo intersessional meeting, we also believe that changes in the certification procedures would be appropriate for certifying these engines.

Thank you Mr. Chairman.