UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAR 12 2012

OFFICE OF
AIR AND RADIATION

The Honorable Mr. Koji Sekimizu
Secretary-General
International Maritime Organization
4, Albert Embankment
London
SE1 7SR
United Kingdom

Dear Mr. Sekimizu,

The United States is a strong supporter of the important work the International Maritime Organization has achieved in the area of air emission reductions, both with respect to criteria pollutants and greenhouse gases. The Parties to IMO realized a significant milestone in the adoption of the 2008 Amendments to MARPOL Annex VI, and the IMO Secretariat should be very proud of leading and facilitating agreement on these important international standards.

Designation of the North American and U.S. Caribbean Emission Control Areas for NOx, SOx, and particulate matter is an important achievement for the United States and a critical part of our strategy to provide healthy air quality for our citizens. By 2030, we estimate that emission reductions from using cleaner marine fuels and engines in these ECAs will prevent between 12,000 and 31,000 premature deaths and 1.4 million work days lost in the United States, Puerto Rico, and the U.S. Virgin Islands alone.

As you may know from recent articles in newspapers and websites, certain cruise line companies are interested in obtaining approval of an equivalent method under regulation 4 of MARPOL Annex VI to comply with the ECA fuel sulfur requirements in the North American ECA. This method, which is operational in practice and not equipment-oriented, involves using a population-weighted approach to calculate emission reductions that would allow cruise ships to use fuel with a sulfur content in excess of the regulation 14 limits in some areas in exchange for the use of lower sulfur fuels while at berth. There are no IMO guidelines to help address such a proposal.

The United States supports the use of equivalent methods to achieve emission requirements, but only as long as they achieve the same results as the requirements they are intended to replace. For example, we support the certification and use of SOx exhaust gas cleaning systems as an equivalent method for compliance with the requirements of regulation 14 of MARPOL Annex VI.

After analysis, we believe the cruise lines proposal is unacceptable because it would result in overall higher emissions than permitted under regulation 14 while also subjecting different segments of the population to unacceptable and unbalanced health risks. The proposal also does

not meet public expectations of uniform delivery of health and environmental benefits for citizens of the United States.

The BLG Sub-Committee is currently tasked with developing draft guidelines for approval of equivalents under MARPOL Annex VI regulation 4. As the Parties move forward to develop these guidelines we hope we can count on your support in guiding the subcommittee's work, reminding them that the principles of Annex VI require that an equivalent method must provide equivalent emission reductions. It is also important that flag states coordinate with affected ECA states before approving equivalents to the ECA engine and fuel controls, since any other approach risks jeopardizing the success of the Annex's regional control measures. The United States respectfully requests your support regarding this issue.

Sincerely,

Jeffrey G. Lantz
Director, Commercial Regulations
and Standards
U.S. Coast Guard

Margo Tsirigotis Oge
Director, Office of Transportation
and Air Quality
U.S. Environmental Protection Agency