



## **Submission on the Environment Select Committee's**

**International treaty examination of  
the Annex VI regulations for the  
prevention of air pollution from  
ships contained in the Protocol of  
1997 to MARPOL**

**16 March 2020**

For more information please contact:

Jane Murray

NMDHB Public Health Service

Email: [jane.murray@nmdhb.govt.nz](mailto:jane.murray@nmdhb.govt.nz)

Phone: (03) 543 7805

## Introduction

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Environment Select Committee's *International treaty examination of the Annex VI regulations for the prevention of air pollution from ships contained in the Protocol of 1997 to MARPOL*.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000, the Health Act 1956, and the Biosecurity Act 1993.
3. This submission sets out particular matters of interest and concern to NMH around environmental and public health matters.

## General support

4. NMH strongly supports acceding to Annex VI regulations for the prevention of air pollution in ports and harbours. Annex VI is considered to be the primary international regulatory mechanism for mitigating maritime greenhouse gases (GHG) and other air pollutants. As noted in our 2019 submission to the Ministry of Transport, New Zealand is very reliant on shipping with 99.5% of trade (by weight) being shipped by sea, and the number and size of ships is increasing. <sup>1</sup>NMH recommends that New Zealand accedes to Annex VI because by doing so, New Zealand will be better able to regulate emission that are harmful to public health.
5. The Ministry of Health's report on Annex VI shows that there are three compelling reasons to accede to the Annex:
  - a. Reduced emissions of harmful air pollutants will result in reduced adverse public health effects (and costs), including premature deaths;
  - b. Reduced emissions of harmful air pollutants will result in reduced adverse effects on ecosystems (e.g. acidification, deposition of toxins such as heavy metals and dioxins); and
  - c. Reduced greenhouse gas emissions are a tangible action to combat climate change (an issue of planetary urgency).
6. NMH supports the accession because the Nelson Marlborough region is serviced by major ports at Nelson and Picton. This accession will bring reduced emissions to key townships in our region.

---

<sup>1</sup> Ministry for the Environment and Stats NZ (2018) New Zealand's Environmental Reporting Series: *Our Air 2018*

7. A 2013 GNS Science Consultancy Report<sup>2</sup> undertaken for the Nelson City Council found that emissions from ship traffic at the Port of Nelson constitute a significant portion of measured PM<sub>10</sub>. The Ministry of Health Report on MARPOL showed that over 20,000 people in Nelson and nearly 3000 people in Picton lived within 3km of ports.<sup>3</sup> In addition, NMH notes that the number of cruise ships continues to increase with cruise ships spending more time in NZ ports.<sup>4</sup> Cruise ships burn heavy fuel oil and those ships require abatement technology (scrubbers) to meet Annex VI requirements when visiting ports. However, many cruise ships do not use scrubbers in NZ because current regulations do not require it<sup>5</sup>. On average, each cruise ship docked in port per visit typically emits 2,620kg of NO<sub>x</sub> (equivalent to the daily emissions of 210,000 cars) and 290kg of PM<sub>10</sub> (equivalent to 280,000 cars).<sup>3</sup> Given the number of people living in close proximity to local ports, NMH recommends that Annex VI is adopted and enforced in order to improve the region's air quality and thus reduce the risk of future health harms from pollution from ships.

## Conclusion

8. NMH thanks the Environment Select Committee for the opportunity to comment on the *International treaty examination of the Annex VI regulations for the prevention of air pollution from ships contained in the Protocol of 1997 to MARPOL*.

Yours sincerely



Peter Bramley  
**Chief Executive**  
peter.bramley@nmdhb.govt.nz

<sup>2</sup> Davy, P. K., Trompetter WJ (2010) Davy, P.K.; Markwitz, A. (2010) Source Apportionment of PM10 in Tahunanui, Nelson, GNS Science Consultancy Report 2010/198. 64p.

<sup>3</sup> Ministry of Health (2019) *MARPOL Annex VI: Air Quality, climate change and health issues for New Zealand*. Emission Impossible Ltd

<sup>4</sup> <https://newzealandcruiseassociation.com/cruise-tourism-projected-to-contribute-695m-to-economy-by-2019>

<sup>5</sup> Cropp A, (2018) <https://www.stuff.co.nz/business/108063789/cruise-ship-pollution-under-the-spotlight-after-vessels-busted-in-alaska-come-to-nz> . Stuff, 27 October 2018.