

MSP SUBMISSION

To: Dept. of H, P, & LG.

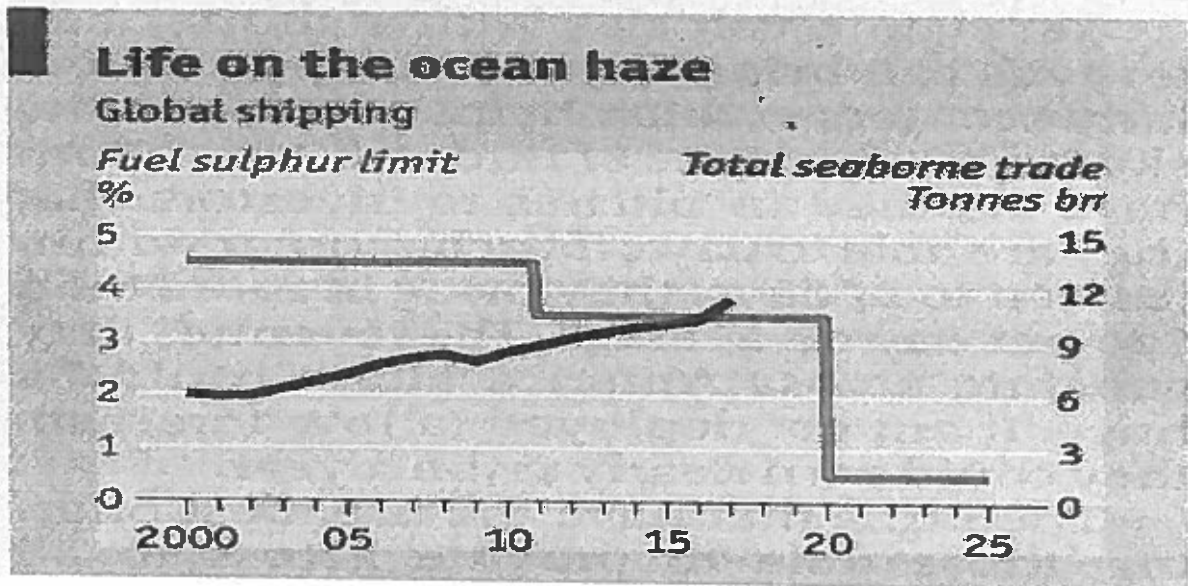
13 Dec 2018

Dept. of Environment, Community
& Local Government
14 DEC 2018
Wexford

To whom it concerns:

The United Nation's International Maritime Organisation (IMO) is the international regulatory body for the promulgation of maritime regulations worldwide. The regulations regarding pollution of the sea and the marine environment are given effect by Marpol 73/78 and its amendments and subsequently ratified by each member state of the UN.

From the diagram below it can be seen that from 2020 Marpol's sulphur cap of 0.5% is due to come into effect on 01 Jan 2020.¹ However, there is much disquiet in the shipping world as oil refineries have indicated that they will not be in a position to supply the global market for marine Heavy Fuel Oil at this low sulphur limit and are seeking a derogation until 2025.



In anticipation that the sulphur cap of 0.5% will go ahead as prescribed, up to 1850 ships have already installed scrubbers to comply.² The scrubber technology utilises sea water, sprayed down, as in a shower, through which the exhaust emissions of the ship's engines are passed. This cleansing process captures the soot (carbon content) particles, to ultimately produce Carbonic Acid, sulphur oxides gases, cooled to below their dew point, to produce Sulphuric Acids, Nitrogen Oxides likewise to produce Nitric Acids, and many more complex toxic constituents to add to the alarm. This toxic cocktail is now passed directly back into the sea.

¹ The Economist, "The Shipping industry Feeling Green" 23rd June 2018, p.56

² Telegraph, "Scrubber Surge" volume 51, number 11 November 2018 p.11

As you will appreciate, the emissions to air are reduced (which ultimately end up in the oceans and on land anyway) but the entire load is now directly dumped into our oceans. What kind of emissions abatement technology is this??? In reality, this is just a fudge, would you not agree?

In light of the above, I would like to propose that a complete ban be placed on exhaust gas scrubber usage in Irish territorial waters. This provision will require ship owners to use clean distilled fuel, LNG or Electric propulsion prior to entry in Irish waters, as is now the case in California, USA.

I would urge you to give this proposal your rigorous consideration.

In appreciation,



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¹ The Economist, "The Shipping industry Feeling Green" 23rd June 2018, p.56

² Telegraph, "Scrubber Surge" volume 51, number 11 November 2018 p.11