2014 年 12 月 4 日

日本船主協会

UNFCCC COP20 に関する ICS プレスリリースならびにパンフレットの発行について
～国際海運からの不合理かつ過大な資金拠出には断固反対～

2014 年 12 月 1 日から同 12 日の日程で、ペルーにて開催中の UNFCCC COP20 について、ICS（国際海運会議所）※は、関連のプレスリリースを発出するとともに、同会合向けのパンフレットを発行しましたので、その背景・概要について以下の通りお知らせいたします。

1. ICS プレスリリース／パンフレットの背景

気候変動枠組み条約（UNFCCC）の締約国会議（COP）において、気候変動対策に供される長期資金について、これまで主として以下の議論があった。

- COP15（2009）；先進国から発展途上国に対する支援を目的に、年間 1000 億ドルの資金（いわゆる長期資金）を官民から広く調達することに合意
- COP18（2012）；何ら検討なきまま、国際海運より年間 100～150 億ドル（長期資金総額の 10～15%）の潜在的拠出を見込むレポートが提出される

以下の理由により、世界の海運産業界は、国際海運からの**不合理かつ過大な資金拠出には断固反対**の立場を取っている。

① 特定のセクターねらい撃ちで、国際海運からの資金拠出に言及するものである
② 国際海運の CO_2 排出量（世界の総排出量比 2.2%）に対して極めて過大な負担（総額の 10～15%）に言及しており、深刻な市場歪曲（環境に優しい海上輸送から、陸上輸送への逆モーダルシフトなど）を招く恐れが極めて強い
③ ましてや、国境なき国際海運における CO_2 排出量削減対策は、国連の専門機関である IMO（国際海事機関）にて検討するよう京都議定書で規定されており、IMO において然るべき対策を実施・検討している状況にある

現状では COP の場で国際海運からの資金拠出に関する決定は何らされていないものの、COP20 での議論の可能性を懸念し、国際海運の立場を明確にしたものである。

2. ICS プレスリリース概要

主として以下を主張するものであるが、詳細は本紙(添付)を参照のこと。

- 国際海運からの CO_2 排出量削減は、船籍に関係なく全ての船舶に対する一律適用を原則とする IMO において、検討するのが最も相応しい。

国際海運は、IMO の下で、CO_2 の排出量削減のために国際的な規制を導入している唯一の産業である。また、IMO では、船舶からの CO_2 排出量削減に向けて、追加措置の検討を進めている。

・ 数百億ドル単位での GCF【Green Climate Fund（緑の気候基金）: 長期資金などの資金の受け皿となると目される基金】への貢献を国際海運に求める提言には断固反対であり、国際海運は“cash cow（金の成る木）”ではない。
国際海運からの CO2 排出量削減に関するいかなる決定も、IMO 加盟国により、IMO の場でなされるべきであるが、（例え GCF への貢献を検討する場合においても）全世界の CO_2 排出量に占める国際海運からの CO_2 排出量比（2.2% : IMO GHG Study 2014）を踏まえた貢献を検討すべきである。

3. ICS パンフレット概要

国際海運の CO_2 排出量削減に関し、IMO による CO_2 排出削減に向けた取り組みの顕著な進展を説明し、UNFCCC が IMO による CO2 排出削減に向けた取り組みを引き続き支持していくべき旨、主張するもの。
UNFCCC の関与により、海運市場に歪曲した深刻な影響をもたらし、また、国際海運全体として有意義な CO2 排出量削減に全く効果的にならないことなどを懸念している。

＊ その他、概要以下についても触れられているが、詳細は本紙(添付)参照のこと。

・ 世界経済成長が見込まれることにより今後も継続的に海上輸送量の増加が見込まれることの説明
・ 船舶は最も環境にやさしい輸送手段との認識である一方、個船の CO2 排出量削減について取組むことには賛同
・ IMO の一律適用の原則、登録船籍国/運航者の船籍が売買船等により頻繁に変わること等から、IMO にて CBDR 原則の概念を直接的に取入れることは非現実的
・ 環境関連規則に関する IMO の実績（海洋の油濁低減、SOx 規制合意による大気汚染物質の大幅な排出削減への取組み）
・ 今後の CO_2 排出量削減方法（運航的手法（SEEMP）の活用や船舶の大型化への期待。また、昨今の燃料費の高騰、燃料油 SOx 規制から燃料油コスト増加見込みにより、船社はコスト削減のため燃料消費量削減に対して強い動機がある由。）

※ 国際海運会議所（International Chamber of Shipping）は、各国船主協会を会員として 1921 年に設立された組織で、本部をロンドンに置く。1948 年に現在の名前に変更された。日本船主協会は 1957 年 4 月に加盟。自由主義海運を標榜するとともに、船主の利益を擁護・代表し、商船隊の発展を促進させることを目的とする団体。海洋環境保全、船舶航行安全、海事法制、情報システム等に関し具体的な検討を行い、IMO 等において海運業界を代表する組織として活動している。

以上

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SHIPPING INDUSTRY SETS OUT PROGRESS ON CO_2 REDUCTION ON EVE OF UN CLIMATE CONFERENCE, BUT STRESSES INDUSTRY IS NOT 'CASH COW'

The global shipping industry, which transports around 90% of world trade, only produced about 2.2% of the world's total Green House Gas emissions during 2012 compared to 2.8% in 2007. Shipping's total emissions have reduced by more than 10% during the same period.

In advance of the United Nations Climate Conference in Lima (1-12 December), the global trade association for ship operators – the International Chamber of Shipping (ICS) – says that the industry is on track to reduce its emissions by more than 20% by 2020 (compared to 2005) with further reductions going forward.

This and other information about the impressive progress which the shipping industry is making to reduce its CO_2 emissions is set out in a special brochure prepared for the UNFCCC Climate Change Conference (COP 20). This can be found on the global trade association's website – www.ics-shipping.org/docs/co2

The shipping industry is the only industrial sector which is already covered by a binding global agreement to reduce its CO_2 emissions, through technical and operational measures agreed – with full industry support – by its global regulator, the London-based International Maritime Organization (IMO).

ICS explains that the IMO is now developing additional measures to reduce CO_2 emissions from shipping and that the UN Conference needs to maintain its support for IMO as the principal forum for addressing emissions from maritime transport, which cannot be attributed to individual national economies.

ICS emphasises that any decision, for example, on whether to develop a Market Based Measure for shipping that might be linked to the Green Climate Fund (GCF) should be a matter for IMO Member States. IMO will be best placed to develop an approach that can reconcile the UNFCCC principle of 'Common But Differentiated Responsibility (CBDR)' – whereby developing countries are treated differently – with the need for all ships, regardless of flag, to be treated in a uniform manner.

Shipping is a global industry requiring rules on CO_2 to be applied on a global basis to all ships. Apart from preventing market distortion in this totally globalised sector, this is necessary to avoid 'carbon leakage' since only about 35% of the world fleet is

registered with those developed nations that are covered by emission reduction commitments under the existing Kyoto Protocol on climate change prevention.

The position of the shipping industry remains that any contribution by shipping to the GCF must reflect the sector's modest contribution to total global CO_2 emissions. ICS is firmly opposed to any suggestion that the shipping industry should collectively pay tens of billions of dollars each year, stressing that the industry is not a 'cash cow'.

Notes

The International Chamber of Shipping (ICS) is the global trade association for merchant shipowners. Its membership comprises national shipowners' associations from 36 countries representing over 80% of the world merchant fleet.

The figures concerning CO_2 emissions reductions from shipping are taken from the Third IMO GHG Study, 2014.

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SHIPPING, WORLD TRADE AND THE REDUCTION OF CO_2 EMISSIONS

UNITED NATIONS FRAMEWORK CONVENTION ON CLIMATE CHANGE (UNFCCC)

INTERNATIONAL CHAMBER OF SHIPPING (ICS)

Representing the Global Shipping Industry

COP 20
LIMA

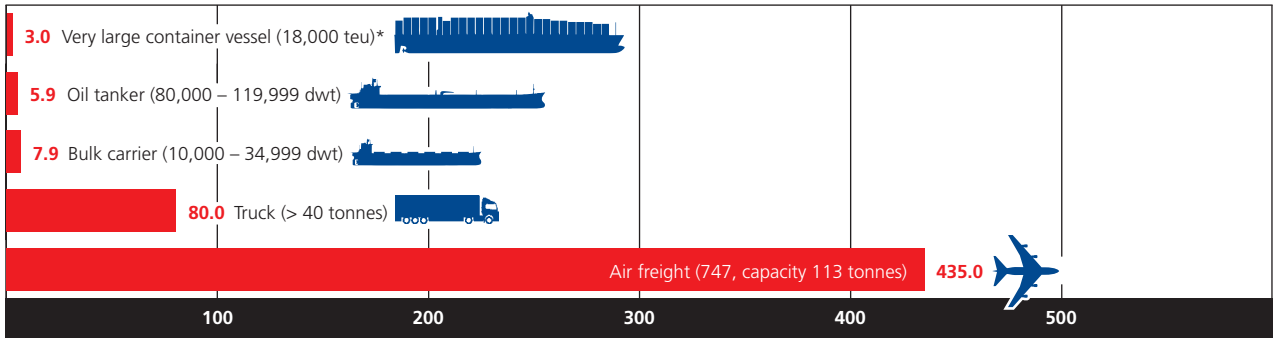
IMO AGREEMENT ON TECHNICAL REGULATIONS WILL REDUCE SHIPS' CO_2

MARPOL Annex VI, Chapter 4 adopted July 2011, which entered into force in January 2013

2013 →	2015 →	2020 →	2025 →	2030 →	→ 2050
Regulations enter into force for over 94% of world fleet	EEDI requires new ships to meet agreed efficiency targets	New ships must improve efficiency 10%	New ships must improve efficiency up to 20%	New ships must improve efficiency 30%	
Ship Energy Efficiency Management Plan (SEEMP): mandatory implementation for all ships		**20% CO_2 reduction per tonne/km (industry goal)**			**50% CO_2 reduction per tonne/km (industry goal)**

COMPARISON OF TYPICAL CO_2 EMISSIONS BETWEEN MODES OF TRANSPORT

Grams per tonne-km



*Source: IMO GHG Study, 2009 (*AP Møller-Maersk, 2014)*

IMO IN SESSION IN LONDON

Front cover photo: Hapag-Lloyd

INTERNATIONAL SHIPPING – SERVANT OF WORLD TRADE

UNFCCC SHOULD CONTINUE TO SUPPORT SIGNIFICANT PROGRESS ON REDUCING SHIPPING'S EMISSIONS AT IMO

The global shipping industry is firmly on track to reduce its CO_2 emissions per tonne-kilometre by more than 20% by 2020,[1] with significant further reductions going forward.

Global shipping, which transports around 90% of world trade, only produced about 2.2% of the world's total GHG emissions during 2012 compared to 2.8% in 2007. Total shipping emissions have reduced by over 10% during the same period.[2]

The shipping industry is the only industrial sector which is already covered by a legally-binding global agreement to reduce its CO_2 emissions, through technical and operational measures adopted by the International Maritime Organization (IMO).

The next United Nations Climate Change Conference (COP 20) therefore needs to maintain its support for IMO as the principal forum for addressing emissions from maritime transport as it continues its vital work of delivering further CO_2 emissions reductions from international shipping.

IMO work currently includes the establishment of a global data collection system to measure CO_2 emissions from individual ships. The development of Market Based Measures for shipping also remains on IMO's agenda.

Shipping is a global industry requiring uniform global regulation. As demonstrated by the ground breaking IMO agreement that entered into force worldwide in 2013, IMO is the best place for the delivery of further emissions reduction measures by the entire international shipping sector, in a manner that avoids market distortion or disruption to international trade flows, while being compatible with the principle of 'Common But Differentiated Responsibility (CBDR)'.

1 Compared to 2005

2 Third IMO GHG Study, 2014

The international shipping industry is responsible for the carriage of about 90% of world trade and is vital to the functioning of the global economy.

Intercontinental trade, the bulk transport of raw materials and the import/export of affordable food and goods would simply not be possible without shipping.

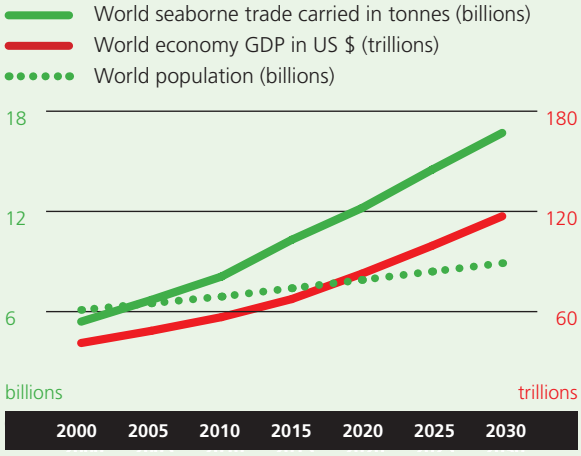
It is the availability, low cost and efficiency of maritime transport that has made possible the major shift towards industrial production in emerging economies, which has in large part been responsible, in recent years, for dramatic improvements in global living standards.

The world's population and economy is expected to continue to grow and shipping will need to respond to the demand for its services (unless existing patterns of global trade were to be fundamentally transformed).

Shipping is an inherently international industry which depends on a global regulatory framework to operate efficiently. If a ship trades from Doha to Dalian, the same rules need to apply (for example: concerning construction, navigation or atmospheric emissions) at both ends of the voyage. Otherwise there would be chaos and serious inefficiency.

For over 50 years this global regulatory framework has been very successfully provided by the United Nations International Maritime Organization (IMO).

PREDICTED INCREASES IN WORLD SEABORNE TRADE, GDP AND POPULATION



Sources:
World seaborne trade – IHS Global Insight
World economy – OECD Statistics
World population – UN Department for Economic and Social Affairs, Population Division

REDUCING SHIPPING'S CO_2

The international shipping industry is firmly committed to playing its part in reducing emissions of CO_2 and other Green House Gases.

International shipping is already, by far, the most carbon efficient mode of commercial transport and continues to improve fuel efficiency and thus reduce CO_2 emissions. But it is fully recognised that CO_2 emissions from the industry as a whole (some 2.2% of global emissions) are comparable to those of a major national economy.

However, shipping is the servant of world trade. The total emissions of shipping, as a sector, will therefore be determined, to a significant extent, by the expected long term growth of the world economy (and population) between now and 2050.

CO_2 REDUCTION MEASURES FOR SHIPPING SHOULD BE LED BY IMO

As already acknowledged by the Kyoto Protocol, emissions from international shipping cannot be attributed to any particular national economy. Multilateral collaborative action will be the most appropriate means to address emissions from the maritime transport sector.

Multilateral collaborative action will be best achieved by governments at the specialist United Nations agency – the IMO – which has a successful track record in the development of global regulations governing the shipping industry's environmental performance. For example, the International Convention on the Prevention of Pollution by Ships (MARPOL), which now contains technical regulations for the reduction of CO_2, has been ratified and enforced globally through a combination of flag state and port state control by IMO Member States.

The delivery of significant emission reductions by the maritime sector will require that any mandatory measures adopted are applied on a uniform and global basis to avoid 'carbon leakage'.

Most shipping companies have the freedom to decide to register their ships with the 'flag state' of their choice including those which, under the current Kyoto Protocol, are not Annex I nations. Measures to deliver meaningful emission reductions are thus much more likely to be achieved by instruments developed by governments at IMO.

In 2014, only about 35% of the world merchant fleet is registered in UNFCCC Annex I countries.

TAKING ACCOUNT OF CBDR

The UNFCCC principle of 'Common But Differentiated Responsibility' (CBDR) cannot be practically applied directly to individual ships without the danger of significant 'carbon leakage'. The 'flag state'[3] with which a ship is registered, or indeed the 'nationality' of the entity operating the ship, can change frequently, especially when ships are bought and sold. The direct application of the CBDR concept would also cause gross distortion of shipping markets, reducing the efficiency of maritime transport and thus the smooth flow of world trade.

Failure to deliver a global and uniform CO_2 reduction regime for international shipping will greatly reduce the ability of the shipping sector as a whole to reduce its emissions.

However, the IMO principle of 'no more favourable treatment' ensures that standards adopted for shipping are applied equally throughout the world, delivering maximum environmental protection and improvement.

The international shipping industry therefore believes that the achievement of meaningful reductions in CO_2 emissions will be best achieved if nations agree that the development of detailed measures for the international merchant fleet should be directed by governments at IMO - while fully respecting the UNFCCC CBDR principle.

IMO AGREEMENT ON CO_2 TECHNICAL RULES

In July 2011, governments at IMO agreed a comprehensive package of technical regulations for reducing shipping's CO_2 emissions which entered into force in January 2013.

The amendments to the MARPOL Convention (Annex VI) include:

- A system of energy efficiency design indexing for new ships (similar in concept to the ratings applied to cars and electrical appliances). The IMO EEDI will lead to approximately 25-30% emission reductions by 2030 compared to 'business as usual'.
- A template for a Ship Energy Efficiency Management Plan (SEEMP) for use by all ships. The SEEMP allows companies and ships to monitor and improve performance with regard to various factors that may contribute to CO_2 emissions. These include, inter alia: improved voyage planning; speed management; weather routeing; optimising engine power, use of rudders and propellers; hull maintenance and use of different fuel types.

RECOGNITION OF CBDR

The July 2011 agreement demonstrates that IMO is eminently capable of delivering a global solution for shipping which can be reconciled with the principle of CBDR - without prejudice to what UNFCCC might decide with respect to other industries. To address CBDR, the IMO agreement includes a regulation for the promotion of technical co-operation and the transfer of technology relating to the improvement of energy efficiency of ships, and requires maritime administrations - in co-operation with IMO - to provide support directly to developing states that request technical assistance.

IMO IS ALSO DEVELOPING ADDITIONAL MEASURES

The IMO agreement on technical measures demonstrates that there is widespread understanding amongst governments worldwide that the most effective means of reducing CO_2 emissions from ships will be for COP 20 to recognise IMO's ability to regulate shipping, so that it can continue its consideration of Market Based Measures (MBMs).

Governments have already made various detailed proposals for a shipping MBM. These have been assessed by an international panel of experts.

AN MBM LINKED TO FUEL CONSUMPTION?

In the event that IMO Member States should decide to develop a climate change funding mechanism to which shipping might contribute, the clear preference of the majority of the shipping industry is for a mechanism linked to fuel consumption, rather than a system based on emissions trading. Most shipping companies, perhaps 90%, are small to medium sized enterprises that have a sound dislike of unnecessary complication. An IMO MBM linked to fuel consumption is the option which most shipping companies can probably accept and support, if agreed by governments.

CO_2 DATA COLLECTION

As an interim measure IMO has now agreed in principle to the development of a global data collection system to measure CO_2 emissions from individual ships. This is fully supported by the industry provided that the system is primarily based on fuel consumption, is simple to administer, and will not be used to develop a mandatory operational index with the risk of market distortion (identical ships on identical voyages may have very different fuel consumption due to differing ocean and weather conditions).

SHIPPING AND THE UNFCCC GREEN FUND

If IMO Member States so decide, any MBM adopted by IMO could potentially involve a linkage to the Green Climate Fund that was established by COP 17, in Durban, in 2011. However, this is a decision for IMO Member States which will be best placed to develop an approach that can reconcile the principle of CBDR with the need for all ships, regardless of flag, to be treated in a uniform manner.

The Green Climate Fund aims to generate US$100 billion per year by 2020, in order to help mitigation and adaptation projects in developing nations. The position of ICS is that any contribution by shipping must reflect the sector's modest contribution to total global CO_2 emissions. As such, ICS will firmly resist any suggestion that shipowners should collectively pay tens of billions of dollars per year. The international shipping industry is not a cash cow!

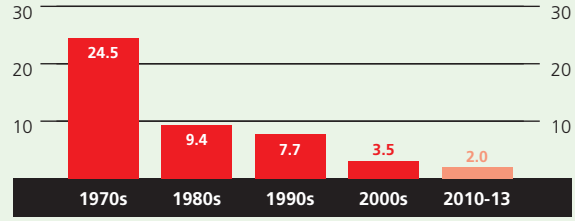
IMO'S TRACK RECORD ON ENVIRONMENTAL REGULATION

The level of ratification and enforcement of IMO Conventions is very high in comparison to international regulations governing many land based industries.[4]

The impressive track record of IMO is demonstrated by the success of the MARPOL Convention (which also now includes regulations to reduce ships' CO_2) in contributing to the substantial reduction of oil pollution since it entered into force.

MARPOL 73/78 HAS HELPED ENSURE A DRAMATIC REDUCTION IN OIL SPILLED

Average number of major oil spills per year (over 700 tonnes)

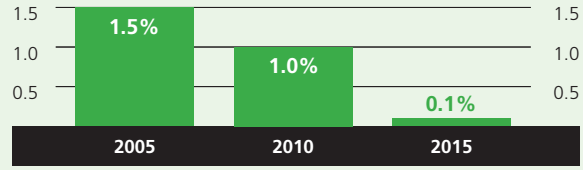


Source: ITOPF

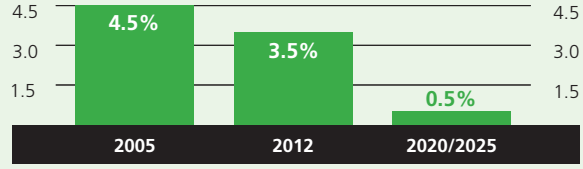
In addition to the ground breaking agreement to reduce CO_2, the ability of governments at IMO to respond to political pressure and to deliver global environmental regulations involving complex issues has also been demonstrated by the agreement[5] to reduce pollutant atmospheric emissions (such as sulphur) from ships dramatically.

IMO AGREEMENT TO REDUCE ATMOSPHERIC POLLUTION FROM SHIPS

Sulphur content of fuel permitted in Emission Control Areas



Sulphur content of fuel permitted outside Emission Control Areas



3 Under the United Nations Convention on the Law of Sea (UNCLOS), the flag state is the administration or government of the state whose flag the ship is entitled to fly.

4 MARPOL Annexes I and II (governing prevention of oil and chemical pollution) have been ratified by 150 nations covering over 99% of the world merchant fleet. Recent amendments to MARPOL Annex VI (which now address CO_2) already cover over 94% of the world fleet.

5 The 2008 amendments to MARPOL Annex VI will, inter alia, reduce the sulphur content in fuel to just 0.1% in Emission Control Areas in 2015.

HOW IS SHIPPING REDUCING ITS CO_2 EMISSIONS?

The consensus of opinion within the global industry is that it will be possible for shipping to reduce CO_2 emitted per tonne of cargo transported one kilometre (tonne/km) by 20% between 2005 and 2020, through a combination of technological and operational developments, as well as the introduction of new and bigger ships, designed to the new IMO Energy Efficiency Design Index.

In the longer term, depending on technological developments which at the moment cannot be fully anticipated, the industry believes it should be possible to deliver even more dramatic emissions reductions.

Although the shipping industry is already very energy efficient, additional improvements to hull, engine and propeller design are expected to produce further reductions in fuel consumption. There may also be possibilities for the better utilisation of waste heat.

The increasing size of many ships is also expected to improve fuel efficiency. In addition, operational measures (e.g. better speed management throughout the course of a voyage) are also expected to reduce fuel consumption and are addressed in detail by the new Ship Energy Efficiency Management Plan that has been made mandatory by IMO.

Shipping companies have a very strong incentive to reduce their fuel consumption and thus reduce their CO_2 emissions: bunker costs represent an increasingly significant proportion of ships' operational expenses, having increased by about 400% since 2000.

There is every expectation that marine bunker prices will remain high. Furthermore, the cost of ships' fuel is expected to increase by a further 50% as a result of the increased use of (low sulphur) distillate fuel that will follow the implementation of the new IMO rules (MARPOL Annex VI) that will apply in Emission Control Areas in 2015 and globally from 2020.

ALTERNATIVE FUEL SOURCES

The latest IPCC Synthesis Report (November 2014) suggests that all fossil fuels should be phased out by 2100. For the immediate future, shipping will probably remain dependent on fossil fuels. In the longer term, however, the shipping industry is exploring a number of alternative fuel sources to help reduce CO_2 emissions.

Liquid Natural Gas (LNG) produces lower CO_2 emissions and could be an interim solution until a viable alternative to fossil fuels is eventually found, especially for shorter voyages provided that supply infrastructure can be developed. Third or fourth generation **biofuels** might conceivably provide a possible alternative although there is, of course, considerable public debate about the net environmental costs (and social effects) of the wider use of such fuels.

Renewable energy sources, such as wind and solar power, may have a place in helping to meet some ancillary requirements, such as lighting on board ships. However, they are not practical for providing sufficient power to operate ships' main engines (the huge physical size of ships should not be underestimated).

Fuel cells may be a possibility for new ships in the very long term, although they are currently too limited in range to offer a viable solution. Even **nuclear propulsion** for merchant ships is technically possible, although safety and security implications and support infrastructure costs would require serious consideration.

The current assumption, therefore, remains that ships will continue to burn fossil fuels for the foreseeable future, and that the most significant means of reducing CO_2 emissions will be achieved by further improvements in efficiency across the entire transport chain.

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The International Chamber of Shipping (ICS) is the global trade association for shipowners and operators, comprising national shipowners' associations from 36 countries, representing over 80% of the world merchant fleet.