



Brussels, 23 March 2012

Dear Commissioner Hedegaard,

*Cc: Vice President Kallas, Vice President Tajani, Commissioners Piebalgs, Damanaki, De Gucht*

We are writing to you to outline our views on upcoming proposals from the European Commission to reduce greenhouse gas emissions from maritime transport.

Regulating these emissions is long overdue. Despite being a substantial and growing source of emissions, shipping is the only sector the EU has not yet included in its efforts to decarbonise the economy. The undersigned non-governmental organisations believe that the Commission should make a meaningful proposal in 2012 to address these emissions. The EU should do so in a way that contributes towards the development of a fair and ambitious eventual global scheme in the IMO and that helps build momentum in the international climate change discussions under the UNFCCC towards a fair and ambitious legally binding agreement by 2015.

The EU effort-sharing agreement makes it clear that the Commission would act if the IMO failed to reach agreement by 2011. At the 63<sup>rd</sup> session of the Marine Environment Protection Committee (MEPC) earlier this month, it was clear that it will be difficult to reach international agreement on a market-based mechanism at the IMO in the near term. We urge the Commission and EU members to continue efforts to reach agreement at global level and wish to stress that any EU action on shipping should be fair and ambitious and act as a catalyst for progress at the IMO. An EU proposal should:

- Reflect the polluter-pays-principle through a strict emissions reduction target and a market-based mechanism to reduce emissions;
- Be based on a robust near and long-term reduction target, at least in line with the EU's own Transport White Paper to achieve a 40% and if possible 50% emissions cut from shipping by 2050, but also bearing in mind the overall EU target to reduce emissions 80-95% below 1990 levels;
- Cover all ships into and out of the EU from all flag states;
- Be environmentally effective by incentivising and prioritising emissions reductions within the maritime sector and limiting the access to offsets. As over half of all CO<sub>2</sub> abatement potential relates to reduced ship speed, any measure should address speed reduction;

- Address barriers to the adoption of feasible abatement measures in the shipping sector;
- Use revenues primarily to support further climate action. This could be done partly within the shipping sector through upfront funding for technology development. But at least 50% of revenues should be dedicated to the Green Climate Fund through an automatic mechanism to set aside revenues that could help to meet the EU's international climate finance commitments and to increase international acceptance of the scheme;
- Take into account the impact of the proposal on developing countries, particularly the poorest and Least Developed Countries, and adopt appropriate measures;
- Be framed as a building block towards an acceptable and effective approach at the IMO which we urge the EU to continue to support. In this regard the Commission should consider appropriate amendments to any EU proposal in the light of possible future agreements arising from the IMO.

We believe, Commissioner, that such a proposal in 2012 would represent timely and needed action to address emissions from this sector and we wish to signal our preparedness to help you ensure such an outcome in Europe and its successful contribution to a global solution.

On behalf of the undersigned organisations,

Yours sincerely,



Jos Dings  
Director, Transport and Environment

Rob van Drimmelen, General Secretary, **APRODEV**

Frederic Hauge, **Bellona Foundation**

Joanne Green, Head of Public Policy, **CAFOD**

Karla Hill, Director, Programmes, **ClientEarth**

Wendel Trio, Director, **Climate Action Network Europe**

Sandrine Mathy, President, **Climate Action Network France**

Kåre Press-Kristensen, **Danish Ecocouncil**

Sanjeev Kumar, Senior Associate, **E3G**

Christoph Bals, Policy Director, **Germanwatch**

Andre Stochniol, Founder, **IMERS**

Natalia Alonso, Head of EU Advocacy, **OXFAM**

Monica Verbeek, Executive Director, **Seas At Risk**

Eelco Leemans, **Stichting Noordzee**

Paul Cook, Head of Advocacy, **Tearfund**

Tony Long, Director, European Policy Office, **WWF**