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Agenda item 16

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ANY OTHER BUSINESS

Comments on document MEPC 80/16/2

Submitted by Inuit Circumpolar Council

SUMMARY

Executive summary: This document welcomes and comments on the intentions of Canada to propose the designation of an Emission Control Area (ECA) in Canadian Arctic waters and stresses the need to have an accompanying equitable transition framework in place to ensure economic hardship, which would impact Inuit communities who did not cause the climate crisis but are being the most impacted, does not occur.

Strategic direction, if applicable: 4

Output: 4.1

Action to be taken: Paragraph 16

Related documents: MEPC 80/16/2; MEPC 79/3/2; PPR 10/6; PPR 7/INF.15; MEPC 59/6/5; resolution MEPC.342(77); PPR 7/8/2, PPR 7/22; PPR 8/5, PPR 8/INF.3; MEPC 75/7/15, MEPC 75/10/6; MEPC 77/16, MEPC 77/16/Add.1; MEPC 78/7/18, MEPC 78/7/27 and MEPC 79/5/3

Background

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the document on *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.4) and comments on document MEPC 80/16/2 (Canada), expressing the intention of Canada to propose the designation of an Emission Control Area (ECA) in Canadian Arctic waters.

2 Resolution MEPC.342(77) urges Member States and ship operators to voluntarily use distillate or other cleaner alternative fuels or methods of propulsion that are safe for ships and which could contribute to the reduction of Black Carbon (BC) emissions from ships when operating in or near the Arctic. Important and relevant sections of resolution MEPC.342(77) emphasize the following:

- .1 that BC is a potent short-lived contributor to climate warming and its contribution to shipping climate impact was incorporated in the *Fourth IMO GHG Study 2020*; and
- .2 that emission factors used in the *Fourth IMO GHG Study 2020* show that, when used in the same engine, a switch to distillate significantly reduces BC emissions per kilogram of fuel consumed.

Black Carbon impacts on Inuit Nunaat

3 Inuit Nunaat, the circumpolar Inuit homeland, is a unique environment and adverse impacts from shipping, such as BC emissions, may be significantly increased as a result. The Arctic Ocean and its coastal seas not only serve as highways for Inuit over the ice in winter and in the open water season, but also are essential for harvesting, culture and livelihoods. Shipping is an integral part of the Inuit communities in all the circumpolar regions. Inuit way of life is intricately tied to the Arctic ecosystem, and Inuit culture, knowledge systems and the region's biodiversity are bound together. Inuit rely on maritime transport for the delivery of necessary goods and services. In many diverse ways, shipping and the ocean are the lifelines for Inuit remote communities.

4 Inuit Nunaat is warming three to four times faster than the rest of the planet. Alarming, Arctic sea ice declined by about 72% between 1979 and 2016 in the month of September. Ice itself is a habitat which sustains wildlife; it is a highway, the transportation route for Inuit, enabling the economies and travel, and is a link to cultural identity for Inuit; it plays a critical role in regulating the world's climate. A warming Arctic is connected to the climate emergency and biodiversity crisis, with social and cultural impacts for Inuit.

5 As the *IPCC Sixth Assessment Report* has outlined (Working Group II, February 2022, to which the Inuit Circumpolar Council is a contributor and expert reviewer):

- .1 loss of ecosystems and their services has cascading and long-term impacts on people globally, especially for Indigenous People, who are directly dependent on ecosystems, to meet basic needs;
- .2 rapid warming and extreme temperatures in the Arctic are leading to unprecedented seasonal sea ice loss, permafrost thaw, and increasing ocean temperatures. Cascading from these biophysical changes are cultural, socio-economic and political consequences that are widespread and largely unprecedented in human history; and
- .3 changes in the Arctic are more pronounced than elsewhere and portend climate change impacts in other areas of the globe.

6 Indigenous Knowledge (see definition in document SDC 9/WP.3), including Inuit Knowledge, from the Arctic region, has also documented major changes to weather, wildlife migration, snow and sea ice, as well as the introduction of new species.¹ These changes have unprecedented and significant impacts on people in the Arctic, especially Inuit who are on the frontlines and experience impacts of severe weather changes, and whose cultural foundation and livelihoods thrive on the very nature of the Arctic environment of cold, snow and ice. Every day, Inuit are witnessing a climate in crisis.

¹ <https://www.amap.no/documents/download/1084/inline>

7 There are immediate human health consequences of being exposed to particulate matter and BC emissions: premature death in people with heart or respiratory disease, non-fatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, increased respiratory symptoms such as irritation of the airways, coughing or difficulty breathing.² For Inuit, this exposure can significantly affect quality of life and community well-being, adding hardship to already climate-vulnerable communities in the north. ICC welcomes Canada's proposal for an ECA in the Canadian Arctic as it would contribute to reducing negative health outcomes for Inuit.

BC emission trends

8 BC, a short-lived climate forcer, is 20% of shipping's CO₂e emissions (*Fourth IMO GHG Study 2020*), which clearly has a disproportionately high impact in the Arctic. BC absorbs heat and melts ice and snow, which results in severe consequences for wildlife and people in the Arctic. BC can destroy ice and snow wildlife habitat, endangering subsistence species that Inuit rely on and endangering biodiversity at large. From 2015 to 2021, BC emissions from ships operating within Arctic waters doubled.³ The Arctic Council's Arctic Monitoring and Assessment Program report⁴ concluded that BC emitted within the Arctic is likely to have five times the warming impact as that of BC emitted in mid-latitudes, which is also reflected in the Sand et al., 2013 study. An ECA in the Canadian Arctic could slow down ice habitat loss and safeguard food security for Inuit.

Equitable transition

9 A just and equitable transition must align with the United Nations Declaration on the Rights of Indigenous Peoples, recognizing and implementing Indigenous rights and considering Indigenous self-determination and self-governance. It also must include the recognition of disproportionate impacts from both direct climate change effects and economic implications of measures to mitigate those effects. In the context of air pollution and BC emissions reductions, marine fuels that could dramatically reduce emissions are available immediately; however, these fuels could increase costs for ship operators and owners and the costs of goods in Inuit communities.

10 An equitable transition in this Canadian case would ensure that any increased costs for the use of cleaner fuels are not passed on to disproportionately affected climate vulnerable Inuit communities. Importantly, populations such as Inuit who did not cause the climate crisis should not be burdened with the costs of mitigating further impacts. Even if, as document MEPC 80/16/2 has outlined, the Canadian ECA is expected to 'place a relatively low incremental cost on Arctic shipping', these costs must be managed and not burden Indigenous Peoples.

11 The IPCC AR6 report is conclusive about climate change's increasing and accelerating impacts on people, particularly for Inuit who are facing changes and impacts happening at a much faster rate than in many other parts of the world. However, the IPCC AR6 goes a step further and recognizes that striving to prevent severe risks in highly vulnerable contexts alone is insufficient. The IPCC AR6 acknowledges the importance of involving a range of stakeholders, especially Indigenous Peoples, such as Inuit, in climate change governance and promoting collaboration between diverse knowledge systems. These findings represent a marked turn in how Indigenous Peoples are portrayed in the global climate change discourse.

² <https://www.canada.ca/en/health-canada/services/publications/healthy-living/health-impacts-air-pollution-2021.html>

³ <https://cleanarctic.org/wp-content/uploads/2023/04/ICCT-BC-2021-briefing-for-CAA.pdf>

⁴ <https://www.amap.no/documents/doc/amap-assessment-2015-black-carbon-and-ozone-as-arctic-climate-forcers/1299>

Historical imbalance of shipping regulations above and below 60° North in Canada

12 As document MEPC 80/16/2 has detailed, the Canadian Arctic was excluded from the original North American ECA designation, which came into force in Canada in 2013. Since that time Inuit Nunangat (Canadian Arctic) has been without equal environmental and health protections from shipping air emissions impacts. The reasons given in document MEPC 80/16/2 were the lack of data as well as low shipping activity. While this may be part of the rationale for the omission of Inuit Nunangat, other historical elements can also be highlighted as a contributing factor. Inuit Nunangat is predominately Indigenous, and the historical evidence for unequal treatment of Indigenous, vulnerable and racialized populations is well documented.⁵ Establishing an ECA north of 60° in Canada contributes to balancing historical inequities for shipping regulations, environmental and health protections within Canada.

Immediate solutions for BC emission reductions

13 Switching away from heavy fuel oils to alternatives like distillate fuel can reduce BC emissions between 50% to 80%,⁶ which would have immediate effect on local heating and snow/ice melt, and the health of people living in the Arctic.

14 Emission Control Areas (ECA): the Inuit Circumpolar Council welcomes the proposal by Canada and as outlined in document MEPC 80/16/2 – projections showed that, if ships comply with ECA and HFO ban regulations, 2030 emissions of SO_x, PM and BC would be 80%, 73% and 58% lower, respectively, compared to a scenario with current regulations (0.50% global sulphur limit). An ECA in Inuit Nunangat would significantly contribute to lowering air pollutants and mitigate climate impacts from BC. To be effective, an ECA should not have provisions for any equivalence compliance methods. As document MEPC 79/5/3 (FOEI et al.) has outlined, Exhaust Gas Cleaning Systems ('scrubbers') transform air pollution into water pollution and could violate UNCLOS and the ongoing implementation of the UN Declaration on the Rights of Indigenous Peoples (UNDRIP).

15 Speed reduction: slowing ships down in some cases can lead to reduced fuel consumption and air pollutants. Speed reduction and optimization can have co-benefits such as lower marine mammal strikes and disturbance, and underwater radiated noise, all of which are important stressors to minimize for healthy Inuit communities and their dependence on the sea for food and culture.

Action requested of the Committee

16 The Committee is invited to consider the comments provided in this document and take action as appropriate.

⁵ 'Environmental inequity has a long history in Canada. Decades of research have repeatedly shown that environmental harms such as air pollution and toxic waste disproportionately affect neighbourhoods with greater percentages of low-income, Indigenous, Black and/or other racialized communities': <https://ncceh.ca/content/blog/renewed-attention-environmental-equity-and-justice>

⁶ <https://theicct.org/fit-for-55-black-carbon-from-ships-aug22/>