

On March 4th, Opportunity Green, Transport & Environment, Green Alliance, the Nature and Biodiversity Conservation Union (NABU), Fundación Ecología y Desarrollo ECODES, ZERO, and the Clean Arctic Alliance submitted evidence to the UK Government on the importance of the expansion of an Emissions Control Area in UK waters. This open letter accompanies those submissions and summarises the evidence to emphasise the importance of expanding a UK Emissions Control Area to reduce shipping's air polluting emissions, protect the UK population from shipping's negative health impacts and prevent harm to biodiversity.

Emission Control Areas (ECAs) reduce emissions from shipping, including nitrogen oxides (NO_x), sulphur oxide (SO_x), particulate matter (PM) and black carbon. In turn, this reduces the sector's negative impacts on the climate, human health and ocean biodiversity. SO_x emissions from ships lead to negative health effects, especially in coastal communities, and the occurrence of acid rain which damages buildings and infrastructure as well as landscapes. Similarly, NO_x emissions cause eutrophication and acidification, which in turn can lead to the disruption of aquatic and terrestrial ecosystems.

According to the results from a forthcoming ICCT publication, the UK waters, including ports, territorial sea, and the remaining non-ECA UK waters, are experiencing heavy shipping traffic and are in **the top 3 most polluted North-Atlantic coastal states**. As [the UK Government's commissioned study](#) stated, "in 2020, UK domestic shipping alone accounted for 12% of the UK's total domestic NO_x emissions, 2% of the UK's total domestic primary PM_{2.5} emissions and 4% of the UK's total domestic SO₂ emissions." And these figures do not account for international emissions, which are a much larger share of shipping emissions in the UK.

An ECA will encourage the shipping industry to **move to the cleanest fuels available** today. This will include a host of co-benefits, for example reducing emissions of black carbon. Black carbon is a potent short-lived climate forcer, responsible especially for increasing the melting of snow and ice and increasing the rate of warming in the Arctic, and also has serious consequences for the health of communities.

The Government's study, mentioned above, quantified the economic benefits to the UK of expanding the ECA to be **up to £415 million**. This is a significant amount and should be considered in conjunction with the health, climate, and biodiversity improvements an ECA would bring. However, the Government's study ignored the benefit to the UK from a reduction in black carbon emissions and does not include any quantification of the benefits to the natural environment (which are significant) of introducing an ECA. Thus, the estimated benefit to the UK of £415 million is almost certainly an understatement.

In addition, it is important to consider the fact that **shipping does not yet pay for its pollution**. Indeed, the UK government's reluctance to include emissions from international shipping in the UK ETS suggests that only domestic shipping need be responsible for its emissions. This means that vessels releasing a large portion of the UK's total shipping emissions do not pay for their pollution in any way.

The expansion of the ECA is **a simple and easy measure** which the UK government can implement, in addition to a number of other measures outlined by the co-signatories in their responses to the call, to bring down emissions and reduce air pollution in the all-important short term. This is essential if we are to meet the goals of the Paris Agreement. There are already ECAs in the North Sea, Baltic and Mediterranean, meaning that **most ships will already be equipped to comply** with the regulations and therefore it will add minimal costs to any journey.

We therefore call on the UK Government to extend the ECA to all UK waters, and collaborate with neighbouring coastal states to establish an ECA beyond UK waters, as soon as possible in order to protect human health, the climate and marine ecosystems.

Signed

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GREEN**

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