

## **Written evidence submitted by Cruise Lines International Association**

### **The IMO Polar Code sets multiple strict safety and environmental regulatory requirements.**

- The IMO's International Code for Ships Operating in Polar Waters (Polar Code) is mandatory under the International Convention for the Safety of Life at Sea (SOLAS) and the International Convention for the Prevention of Pollution from Ships (MARPOL). The Polar Code entered into force on 1 January 2017 to address the unique risks present in polar waters not already covered by other regulatory instruments.
- The Polar Code covers the range of shipping matters relevant to navigation in waters surrounding the two poles – ship design, construction, equipment; operations and training; search and rescue; and protection of the unique environment and eco-systems of the polar regions.
- Additionally, the IMO has adopted a prohibition on the use and carriage for use as fuel of heavy fuel oil (HFO) by ships in Arctic waters on and after 1 July 2024. CLIA's ocean-going cruise line members have committed not to burn HFO in the Arctic since 2019.

### **In addition to the Polar Code, cruise lines are subject to other laws and requirements established by national and local authorities, and subject to inspections and assessments by classification societies.**

- For example, cruise ships visiting the Svalbard region are required to operate under additional restrictions imposed during vulnerable times, such as moulting or bird mating seasons.
- Classification societies conduct inspections and surveys designed to evaluate and certify ships for their seaworthiness, responsible operations, and compliance with regulations. Many ships, for example, have earned certifications that attest to their reduced environmental impacts as a result of their design, use of environmentally responsible materials and equipment, and operational procedures.

### **Cruise lines are leading the way investing in the development of new sustainable fuel sources and propulsion technologies that will benefit the entire maritime sector.**

- Cruise lines' sustainability and environmental technologies and practices go well beyond the engine room. The future of sustainable cruising is being built into cruise ships under construction today--they need to be since most, if not all, of those ships will be sailing in 2050.
- While the technology for carbon-free cruising is still years away and sustainable marine fuels and propulsion are not yet available at scale, cruise lines are addressing these challenges with innovative approaches, transitional fuels, and systems designed to help the cruise sector to transition to low and zero-carbon fuels.
- More cruise ships are using liquified natural gas (LNG) as a transitional fuel, and the most readily available low carbon fuel with a clear pathway via bio-LNG and synthetic LNG to net zero. LNG produces zero sulphur emissions, 85% lower nitrogen oxide emissions, almost 100% fewer particulate and black carbon emissions, and a 20% reduction in greenhouse gas emissions. Engine technologies have significantly improved, and the expectation is for minimal methane slip by 2030. Since 1993, at least one engine manufacturer has cut methane slip from dual-fuel engines by 85%.

- Near-term solutions are offered by sustainable biofuels – namely, advanced biofuels (using non-food biomass), including bio-methanol and biomethane. Medium-term options being explored include synthetic e-fuels like e-methane and e-methanol. The first ships incorporating methanol are scheduled to be delivered in 2024. Seven ships incorporating methanol are due to be launched by CLIA members during the next five years.
- Multiple pilot projects and collaborative initiatives are underway, and new engines, and propulsion technologies are actively being planned and tested for use on cruise ships. These trials include exploring the expanded use of biofuels (already in use on four ships), synthetic carbon fuels, and electric batteries, hydrogen fuel cells, and methanol fuel cells as part of hybrid solutions. Battery technology can help to ensure engines and fuel cells operate at their most efficient and supply short periods of zero-emissions power.
- In 2023 a new cruise ship will enter the market which will use hybrid technology for the vessel's engines. The ship will reduce carbon emissions through use of LNG and by charging fuel cells and batteries to reduce the consumption of fuel whenever possible (power shaving).

**Safeguarding environmentally vulnerable destinations is a priority for the cruise sector. The following are examples of how cruise lines are leading the way to protect environmentally sensitive areas.**

- Use of GPS hi-tech stabilisers instead of anchors to protect the seafloor.
- Production of water needs onboard so as not to burden local or sensitive areas.
- Advanced wastewater treatment systems that are designed to protect the ocean environment.
- Waste reduction systems and practices, such as recycling, elimination of single-use plastics, and onboard systems that convert waste to energy.
- The 245-passenger expedition ship, Le Commandant Charcot, operates on liquified natural gas and battery power. The vessel uses batteries to provide the hotel load when it has stopped to observe something of interest, allowing the main engines to be turned off, quieting the vessel. Equipped with Azipod® propulsion technology, which produces minimal noise and vibrations, the ship's energy storage system (five megawatt hours) enables engines to be switched off for silent, emissions-free cruising. The ship is made available to scientists and academic researchers studying the oceans and polar regions, with its supplies of measurement instruments, science labs, moon pool for collecting and analysing samples etc.
- CLIA members operating in the Arctic region are active in the environmental conservation efforts of the Association of Arctic Expedition Cruise Operators (AECO) and the International Association of Antarctic Tour Operators for Responsible, Environmentally Friendly and Safe Tourism (IAATO), whose protocols cover a range of responsible and tourism topics such as safety, biosecurity, community interactions, and operations. As members of AECO and IAATO, cruise lines agree to design their itineraries and protocols in polar regions in accordance with directives issued by these organisations, including the maximum number of passengers allowed to disembark and the specific conduct to be followed (i.e., maximum wildlife approach distances; briefings for passengers, crew and expedition personnel; the level of polar region experience of expedition personnel; and emergency and medical evacuation plans).

**Community engagement is a priority in remote, sensitive regions.**

- As part of their membership in AECO, members agree to develop specific environmental briefs for each sensitive area they visit, to establish a code of conduct for passengers, and to submit

sailing plans and booking time slots in advance of each season to avoid having two vessels at the same site at the same time.

- Itinerary planning also includes collaboration with local communities in sensitive areas. This could entail a cruise company sending teams of scientists, social experts, and naturalist guides to meet local authorities and charitable organisations to establish responsible tourism and eco-focused systems for docking and disembarkation.
- Recently, cruise lines, through membership in AECO, agreed not to travel through Eclipse Sound this summer and instead go through the Pond Inlet strait. The decision was acknowledged favorably by a marine conservation group and Inuit hunters agreeing to avoid the Nunavut waterway where thousands of narwhal migrate each summer. During visits to local communities in the Arctic, engagement with local service providers might be held to first understand if the ship will be welcome to visit, how they want to engage, and what they might like to share, for example a cultural experience. These conversations with communities start early to give them as much time to prepare as they can.
- Nalunaiqsijit, the Inuit Cruise Training Initiative, is a programme dedicated to providing the Nunavummiut people with the qualifications and certifications required to work onboard expedition cruise ships, through in situ training and experience onboard ships.
- Cruise lines also participate beach clean-up projects (such as those organised by AECO in Svalbard and Franz Josef Land), and 'citizen science' projects organised through The Polar Collective and other organisations. These initiatives allow passengers to participate alongside cruise line representatives, researchers, and scientists to advance the work of programmes like Penguin Watch, Seabird Watch, Happywhale, Global Clouds, FjordPhyto and Seabird Survey.
- Other partnerships and collaborative conservation initiatives that cruise lines support through direct funding, in-kind services, research, and other projects include BirdLife International for the protection and support of critically endangered birds, the Antarctic Heritage Trust, the World Wildlife Fund, the University of Canterbury, and The Last Ocean Charitable Trust.

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