# WSC Statement on Control Measure for Ocean-Going Vessels At Berth
# CARB Board Hearing
# June 25, 2020

The World Shipping Council (WSC) is a non-profit trade association that represents the liner shipping industry, which is comprised of operators of containerships, roll-on/roll-off (ro-ro) vessels and vehicle carriers. WSC's members operate approximately 90% of the world's liner vessels, which make frequent calls in California ports.

CARB's current at berth rule imposes essentially all of the regulatory obligations and penalty risk on ocean carriers. To fix this problem, WSC and its members have actively encouraged CARB to modify the structure of the current rule to establish clear and appropriate obligations for shore side entities to provide the shore power infrastructure that is required to connect arriving vessels. We support the proposed rule's inclusion of appropriate infrastructure, connection and performance obligations on ports, marine terminal operators and on emissions control strategy operators.

WSC and its members have worked with CARB staff for several years to revise and improve the current at-berth rules to ensure ocean carriers are not subject to requirements that are impracticable or that fall outside of their control. While the proposed rule addresses some of WSC and the industry Coalition's concerns, many issues remain.

Our formal written comments on the December 2019 proposed rule and on the recent "15-day changes" to the rule flag the remaining problems with the rule and include reasonable and practicable recommendations to address those problems. Our comments highlight the need for changes to the proposed requirements for connection time, infrastructure planning, vessel incident exceptions and other provisions that are likely to create compliance problems for carriers.

An issue about which we continue to have serious concerns is CARB's proposal to expand, and even accelerate, the rule's applicability to ro-ro vessels (including vehicle carriers) without a definitive cost-benefit analysis and based on the hope that emissions capture technology, which has significant problems today, will become a viable control option for ro-ro vessels.

Ro-ro vessels make infrequent and very short port calls in California. Over the course of a year, each vessel in a ro-ro fleet will call only 2 or 3 times and for a very short interval. This means the CARB requirement would become a fleet requirement. The problem is that ro-ro vessels and the terminals they call have limited viable compliance options due to operational issues. For example, barge-based emissions capture systems present safety and reach issues due to the significant vertical and lateral distance to reach the vessel exhaust stacks. Shore-based emissions capture systems would obstruct cargo operations and exceed the load bearing capabilities at certain California ports.

CARB's proposal fails to demonstrate that a cost-effective and practicable pathway exists for controlling ro-ro vessels' auxiliary emissions, fails to address the major operational, safety and cost issues the proposed emissions capture systems pose for ro-ro vessels and fails to account fully for the emissions generated by emissions capture systems.

Compelling ro-ro carriers to try to comply with the rule using the operationally impractical, complex and costly emissions capture systems currently on the market is not appropriate and will delay the adoption and benefits of more practicable zero-emission technologies that still need to be developed.

Finally, WSC would support adjustments of the implementation dates back, as described in the staff brief. This additional time must be used to ensure adequate shoreside infrastructure plans are approved and implemented, address the remaining problems with rule as discussed in our comments, and properly assess the costs versus benefits and feasibility of regulating ro-ro auxiliary emissions.

Thank you for your consideration.

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