



June 30, 2022

Jonathan Foster, Marine Strategies Section
Jeff Jacobs, Freight Policy Section
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814
Via Electronic submittal

RE: Innovative Concept from Shell

Dear Mr. Foster and Mr. Jacobs:

We would like to thank the California Air Resources Board for soliciting stakeholder input on the Innovative Concept from Shell.

Pacific Environment is a global environmental organization that protects communities and wildlife of the Pacific Rim. We support community leaders to fight climate change, protect the oceans, build just societies, and move away from fossil fuels toward a green economy. Pacific Environment is headquartered in California and has earned rare permanent consultative status at the International Maritime Organization (IMO), the United Nations' entity that sets international shipping law. We are co-founders and leaders of a burgeoning new global coalition of environmental, environmental justice, and ocean organizations working to rapidly accelerate the shipping industry's zero-emission transition on a 1.5C-aligned timeline.

The proposed Innovative Concept is to use a capture and control system and allow for emission reduction credits available from unregulated sources. While we appreciate the effort to reduce toxic emissions from ships, this is not an innovative concept. This is something that the shipping industry has been using for a decade to avoid taking responsibility for upgrading their dirty fossil-fueled ships.

Diesel exhausts from ships carrying goods at ports are known to cause severe illnesses from aggravated asthma, lung cancer, heart disease and neurological disorders, and premature deaths. Ocean going vessels are the top cancer causing emissions at ports due to their diesel emissions, surpassing heavy duty trucks. CARB's own [emissions analysis](#) report found that fossil fuel pollution from 2021 cargo ship congestion at San Pedro ports has caused an increase in NOx emissions equivalent to 5.8 million passenger cars in South Coast, and an increase in particulate matter (PM) emissions equivalent to *100,000 big rig trucks (or "Class 8 diesel trucks") *per day*.

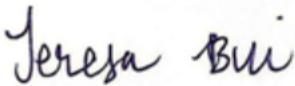
Our concern with this proposal is that this could delay the implementation of shorepower for both the regulated and unregulated ships – **using shorepower is the most efficient way to reduce emissions from ships at berth.** Regulated ships will not use shorepower or zero-emission technologies (e.g., batteries) because they'll use credits generated from unregulated ships, and unregulated ships will only generate credits if they don't already use shorepower or other zero-emission technologies.

While we applaud the applicant for their technology to reduce emissions from ships, the fact that the technology shows they plan on capturing emissions from bulk carriers and general cargo vessels, and vessels at anchor affirms that Pacific Environment's position that bulk carriers and general cargo vessels, and vessels at anchor need to be added under the At-Berth rule, and that tanker vessels implementation should be accelerated to 2024, instead of 2025 and 2027 (see attachment).

The capture and control system should only be used as a secondary measure and not in lieu of shorepower, and we urge CARB to not approve the Shell application as an innovative concept.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in dark ink that reads "Teresa Bui". The signature is fluid and cursive, with the first name "Teresa" and last name "Bui" clearly distinguishable.

Teresa Bui
State Climate Policy Director

cc:

Angela Csondes, Manager, Marine Strategies Section, CARB
Bonnie Soriano, Chief, Freight Activity Branch, CARB

Attachment: Pacific Environment's comments on CARB's OGV At Berth Interim Evaluation Report