



ASSOCIAZIONE NAZIONALE
PER LA TUTELA DEL PATRIMONIO
STORICO ARTISTICO
E NATURALE DELLA NAZIONE
SEZIONE DI ANCONA "Vincenzo Piranti"
www.italianostra.org



April 26, 2023

Mr.

Virginijus Sinkevičius

EU Commissioner

Environment, Oceans and Fisheries

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More checks and transparency against the free flowing shipping fumes in port cities

Dear Commissioner Sinkevičius,

we are writing to you regarding the current rules on checks of shipping fumes.

While we appreciate the work that the Commission is carrying out on maritime fuels and cold ironing/ electrification of shipping in ports we are, nevertheless, aware that it will take years if not decades before the EU and world shipping fleets stop using very polluting fossil fuels.

Still, in this lapse of time, our windows in Genova, Livorno, Venezia, La Spezia, Ancona, Civitavecchia, Naples and in so many more European port cities will continue gathering the toxic fumes of ferries, cruise ships, cargo vessels while they sail, maneuver and moor in front of the citizens' homes.

As a recent EU project in Northern Europe recently showed¹, EU citizens cannot expect shipowners to be fully compliant with the environmental rules they are subject to, despite their weakness, until effective rules on checks, controls and their transparency are set up at EU level.

This is the reason why we are, not only from Italy but from many other European countries, currently [appealing](#) to EMSA for it to start a process in this direction by fully integrating the transparency of the checks on fuels that are carried out in the EU at a detailed level in the Thetis Eu Registry that EMSA holds.

Citizens need to know who is cheating at the expense of their health, authorities need to gain the trust and acknowledgement of the citizens for the environmental monitoring they carry out and, last but not least, shipowners need to be visible both if they comply with the regulation, thus gaining the appreciation of their clients and if they cheat, risking losing a portion of their market due to their environmental liability.

In addition to that, however, it is well clear to everyone **that the prescribed number of checks on ships currently foreseen by Directive EU 2016/802 is completely inconsistent with the need to make sure that shipowners comply with the current regulation on the Sulphur content of the fuel they use.**

¹ <https://www.chalmers.se/en/current/news/see-half-of-the-ships-well-above-emission-limits-for-nitrogen-oxide/>

The risk of being checked in EU ports is - according to the current rules that provide for controls on 3% of the ships counted not by the number of their calls but by single ship having called once in each country - is negligible and prevents any sanction from being really “effective, proportionate and dissuasive” as the Directive indicates.

We are, therefore, writing to you to underline the importance of the issue of effective implementation of the existing rules starting from that of the number and effectiveness of checks on fuels and other environmental issues so that it be taken in consideration in the current flow of directives revision. This, also considering the effectiveness of drones controls that are now well available to us, in order to make sure that the environmental rules are not only adopted and theoretically effective, but that Member states are obliged and committed to implementing them efficaciously.

We wish to finally underline how crucial is the EU Commission work on shipping to protect the citizens of our port cities from the impact of the toxic emissions of ships that, as it appeared from a thorough study carried out in Civitavecchia², determine a 31% increase in lung cancer and a 51% increase in neurological premature deaths of citizens who reside with 500 meters from the port.

Finally, and in light of the dramatic impact of the shipping industry activity on citizens, we wish to recommend that, in the future, the EU Commission tightly supervises its strategies and the projects commissioned to **always include an organic and sound scientific and citizens component** so as to avoid that, as it very recently happened within for the report “Good practices for sustainable cruise tourism” produced within the Coastal and Maritime Strategy of DGMARE, the money spent by the EU citizens never again be a report whose findings and recommendations are completely failing an inclusive and scientifically rigorous context.

Yours sincerely,

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Comitato Tutela Ambientale Genova Centro Ovest
Comitato Vivibilità Cittadina Napoli
Associazione Livorno Porto Pulito APS
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Comitato Tutela Ambientale Genova
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^{2 2} Effetti delle esposizioni ambientali ed occupazionali sulla mortalità della popolazione residente nell'area di Civitavecchia, DEPLAZIO, 2016, <https://www.deplazio.net/images/stories/files/rapporto-coorte-civitavecchia-maggio2016.pdf>



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