



Cruise Lines International Association (CLIA) is the global peak cruise industry trade association, representing 95% of the world's ocean-going cruise capacity. CLIA also serves as a non-governmental consultative organisation to the International Maritime Organization, an agency of the United Nations.

Our previous submission addressed many of the issues raised in the discussion document, and there is no need to recanvass those matters. However the document highlighted a few points that are worthy of re-emphasis.

### **Harmonisation with International Maritime Organisation**

It is critical that any action taken by New Zealand is tied directly to current International Maritime Organisation (IMO) requirements.

CLIA Members are focused on the path to net zero by 2050 and applaud IMO Member States like New Zealand supporting this global approach. However any approach must be mindful to avoid double taxing or counting of emissions, including charges for upstream emissions (such as fuel production) or payments into more than one system (if policy led to some form of market-based measure).

This is also critical when considering whether to look at a more ambitious target, as mentioned in the discussion document. Any step to introduce a more accelerated target that puts New Zealand in conflict with the IMO would have far-reaching consequences for the cruise industry in New Zealand.

CLIA Members support a lifecycle emissions analysis for marine fuels (ie. a well to wake emissions analysis with corresponding certification schemes for fuels) and this comports with IMO's development of the LCA framework on which global GHG reduction measures such as a GHG Fuel intensity standard and a global GHG pricing mechanism will be developed and implemented as soon as 2027.

Any work on this issue by New Zealand can assist in supporting the global approach by implementing chain-of-custody/accounting models such as Book and Claim and Mass Balancing in policy and regulatory frameworks. The Government can also provide shoreside infrastructure, including capability for shoreside electricity and incentives in the short term for the uptake of sustainable marine fuels.

### **Co-operation with Australia**

Unlike the aviation industry, the vast majority of cruise ships in New Zealand will transit directly to and/or from Australia on each visit. Therefore it is beneficial to view emissions reduction in a regional context, especially on matters such as sustainable marine fuels.

It would be best for any strategy adopted by New Zealand be compatible with the work currently being undertaken by the Australian Government through their Maritime Emissions Reduction National Action Plan.

### **Cruise Industry Priorities**

CLIA members are keen to see investment from National Governments in infrastructure to support the path to net zero, such as shoreside electricity and alternative fuel production. This is the highest priority for our industry in this region. If incorporating maritime emissions into New Zealand's targets helps to accelerate that investment, then CLIA would be supportive of this approach.

However as mentioned above any action must be directly in line with existing IMO targets and methodologies.