

One aspect of Hong Kong that seems to surprise visitors, especially those living in other places in Asia or those who have recently visited those other places, is the relatively high degree of criticism and adverse comment we have in our media. Some see this as being a negative indicator; wouldn't it be better if everybody seemed happy and content? But after consideration, which really doesn't seem to take very long, our visitors recognize this to be good and healthy, and an excellent indicator of the strength and robustness of Hong Kong society.

While the freedom of speech in Hong Kong would appear to give doomsayers ample opportunity to spread their depressing messages, it clearly stirs discussion and debate. Of course, it does make life much more difficult for those in Government or those whose positions in society puts them in the public eye. It is essential, however, for Government not to become paralysed by criticism, or to reverse policies as a result of loud adverse comment from vocal minorities. It is necessary to realize that it is a human failing to concentrate on the bad news rather than celebrate the good, but this should be seen as a reflection of the fact that bad news is unusual, which frankly is a good message to give.

Free speech and a willingness to speak out are Hong Kong's strengths, and we use them to the full both in Hong Kong as well as in the debate about legislation and regulation of our shipping industry. Because of our willingness to express intelligent, well thought out and sometimes contrary but fully justified opinions, the Hong Kong shipping industry continues to punch well above its weight, and is frequently asked to represent the Asian voice, both in regional and international fora.



對於遊客，特別是那些亞洲的遊客或近來訪問過亞洲的遊客來說，香港令他們感到驚奇的地方就是媒體鋪天蓋地的批評和反對聲音。有些人認為這不是好的現象，應該人人高興和滿意才好呢！不過經過思考後，他們認為這是健康社會的表現，也表現了香港的優勢和活力。

言論自由也許給所謂的預言家機會散播悲觀消息，但是同時也引起爭論。這雖然會讓政府官員和那些社會知名人士日子很不好過，但是政府官員不應為批評而氣餒，或者因為少數反對意見的高嗓門而改變政策。必須瞭解人類的缺點就是注重壞消息而不是慶祝好消息。這也許是事實的反映，壞消息由於其不尋常的性質而往往更易傳播。

言論自由和敢於大聲說出自己的意見是香港的力量，我們不僅在香港充分利用這種力量，而且還在討論涉及我們航運業的法律條例方面也充分利用這種力量。正是因為我們敢於提出智慧的、深思熟慮的，有時雖然相反但卻是正確的意見，香港航運界一直舉足輕重，經常被邀請在地區和國際舞臺代表亞洲發表意見。



The National 12th Five-Year Plan, promulgated in March 2011, is of great significance to Hong Kong and its shipping industry. The Plan contains a Dedicated Chapter (Chapter 57) on Hong Kong and Macau, unofficially translated as "Maintaining the long-term prosperity and stability of Hong Kong and Macau".

Premier Wen Jiabao has said that the Plan will in no way replace Hong Kong's own development plan, and that the purpose of the Plan is to support Hong Kong and Macau's development. Of relevance to our sector is the Plan's specific intent to reinforce and enhance Hong Kong's status as an international centre for shipping, which demonstrates the clear intent of Central Government to continue to support the growth and development of Hong Kong's maritime service industries, and to maintain Hong Kong as one of the major international maritime centres in China, in Asia and globally.

In order to support the further development of Hong Kong's maritime industry, the Association has formed very close links over the past few years with central government, particularly with the Ministry of Transport and the Maritime Safety Administration, and also with our counterparts in Shanghai and other mainland maritime cities. We work closely with the Commissioner of Foreign Affairs in Hong Kong and with the Liaison Office of the Central People's Government in Hong Kong SAR, and have developed a strong relationship with the local office of the PLA Navy.

Peter Hinchliffe, the new Secretary General of the International Chamber of Shipping and International Shipping Federation, has very kindly written the guest article for this Year Book. In his article, Peter points to the avalanche of regulation that will hit our industry in the next few years.

As I pointed out in my Annual Review, presented to the Annual General Meeting in November 2010, this Association has been and remains involved, deeply involved in many cases, in the discussions being held in the industry on potential and existing regulation, in order to discover and develop suitable and practical advice to our members. We will continue to be involved through the avalanche that will swamp us, offering all our members some measure of protection, a lifeboat perhaps, through being forewarned, forearmed and well prepared.

Some time ago, this Association realized that while handling all issues to a greater or lesser extent, always for the benefit of our members, seafarers and the environment were the two areas that required the majority of our attention. This review mainly concentrates on these two areas, but by doing so, rest assured that we do not ignore the many other issues that affect our industry, and which we are also currently handling on behalf of our members.

2011年3月通過的國家第十二個五年計劃對香港和航運界非常重要。該計劃有專門針對香港和澳門的章節(第57章)，題為“保持香港澳門長期繁榮穩定”。

溫家寶總理說該計劃不會取代香港本身的發展計劃，該計劃的目的是支持香港和澳門的發展。與我們行業有關的是五年計劃強調維持和加強香港國際航運中心的地位，表明中央政府繼續支持香港海運服務業的成長與發展，維持香港作為中國、亞洲和國際海運中心之一的決心。

為了支持香港海運業的進一步發展，協會在過去幾年與中央政府有關部門特別是交通部、海事局和各地船東協會建立了非常密切的關係。我們與中央人民政府駐香港特別行政區聯絡辦公室、外交部駐香港特別行政區特派員公署和解放軍駐港部隊都建立了非常密切的工作關係。

國際航運商會及國際航運聯盟新任秘書長 Peter Hinchliffe 特別為本年刊撰稿。他在文章中介紹了未來幾年如雪崩般襲擊我們的行業相關法規。

正如我2010年11月在年度回顧中指出的那樣，協會過去和將來都將積極參與業界關於現存和潛在法規的討論，為會員提供合適和切實可行的建議。我們將繼續參與即將湮沒我們的法規討論，通過提前警告、提前武裝自己和充分準備等方式為會員提出一些自我保護方法，也可以說是救生船做到有備無患。

前段時間，協會認識到為了最大限度地使會員獲利，船員和環境問題是所有協會研究問題中的重中之重。本回顧也將重點介紹這兩個議題，當然我們不會忽略其他影響我們行業的問題，並將繼續代表會員研究這些課題。



### The Shipping Industry

The international shipping industry is the servant of world trade, and our fortunes therefore rise and fall in line with the growth or contraction in world trade. But our fortunes are also hugely dependent on our readiness to order new ships, a readiness that sometimes seems to be determined more by the current market than any well thought-out long-term prognosis. It is now clear that our over-enthusiasm for the builder's yard has caught up with us. Our new ships are now being delivered, and even the 2010 increase in seaborne trade after the sharp contraction in 2009 is not sufficient to employ all the ships now on the water, never mind those that are still to be delivered.

The world fleet of all ships over 300 gross tons (gt) at 1 January 2011 consisted of **47,833 ships** of **1.349 billion deadweight** or **909 million gt**, an increase of **885 ships** on the year before. The world fleet of all ships over 300 gt has expanded by **3,230 ships**, or **7.24%**, over the past three years.

World seaborne trade increased year-on-year by **7.3%** in 2010, to **8,367 million tonnes**. Over the last three years, world seaborne trade has increased by **2.68%**.

By country of domicile, the Hong Kong fleet of ships over 1,000 gt as of 1 January 2011 was **674 ships** of **37.3 million deadweight** with an average age of **9.7 years**, which puts it in the position of being the world's **8th** largest owning centre (2010, 7th). The average age of the world fleet of ships over 1,000 gt as of 1 January 2011 was **15.6 years**.

In terms of the Gross Tonnage of vessels of over 300 gt at 1 January 2011, Hong Kong was the **5th** largest ship register, coming after Panama, Liberia, the Marshall Islands and Bahamas but very closely followed by Greece and Singapore. In terms of Deadweight, Hong Kong was the **4th** largest ship register, behind Panama, Liberia and the Marshall Islands.

*(All statistics taken from Shipping Statistics and Market Review, Volume 55, No 1/2 - 2011, Institute of Shipping Economics and Logistics.)*



### 航運界

國際航運界是全球貿易的僕人，我們的財富也隨著全球貿易的起伏而增減。但是我們的財富還依賴訂購新船的意願，而這種意願常常為市場所左右而非經過深思熟慮和長期打算。顯然，目前我們過渡熱衷訂購新船的意願將遲早為此付出代價。雖然2010年的海運貿易量經過2009年的大幅下降後略微上升，但此增幅遠遠不能滿足已交付使用新船的運量需求，這還未包括未來交付使用的新船。

截至2011年1月1日，世界商船隊超過300總噸的船舶數量為**47,833艘**，達**13.49億載重噸**或**9.09億總噸**與去年同期相比增長**885艘**。世界商船隊超過300總噸的船舶過去三年增加**3,230艘**，增幅為**7.24%**。

2010年世界海運貿易年度增幅為**7.3%**，達**8,367億噸**海裡。過去三年，世界還遠貿易的增幅為**2.68%**。

以本地船隊為例，截至2011年1月1日，香港商船隊1,000總噸以上的為**674艘**，合**3,730萬載重噸**，平均船齡為**9.7年**。香港名列世界**八大**船東中心(2010年第7名)。截至2011年1月1日，世界商船隊1,000總噸以上的平均船齡為**15.6年**。

截至2011年1月1日，香港300總噸以上的船舶數量名列世界**第五**，僅次於巴拿馬、利比理亞、馬紹爾群島和巴哈馬，希臘和新加坡緊隨其後。以載重噸統計，香港名列世界**四大**船舶註冊地區，僅次於巴拿馬、利比理亞和馬紹爾群島。

*(所有資料來源自2011年航運經濟與物流研究所出版的《航運統計及市場回顧》第55期)*

### Piracy

Piracy is the issue that is at the top of the industry's agenda. The situation off Somalia has become unbearable, and the risk to seafarers and their ships unacceptable. The industry has come together to speak out about the situation, and various proposals have been made; to amend SOLAS to allow armed guards on board ship, to reclassify acts of piracy to allow navies to pre-empt attacks rather than act defensively, to use the carriage of piracy-related equipment as reason to arrest potential pirates, amongst others.

What is clear, at least to the industry, is that Governments still do not see piracy and attacks on ships as being particularly serious – the rather lame UN Security Council Resolutions are proof of this lack of will. The situation at sea would now appear to be totally out of control, adherence to the recommendations of the Best Management Practices 3 seemingly no more than applying a band-aid to serious trauma, and there is a definite risk of piracy spreading beyond the already vast area of the Arabian Sea and Western Indian Ocean. An area that accommodates the movement of the major proportion of world trade.

The solution, as this Association has continually repeated, must be on land. This is a United Nations responsibility, not the job of privately or government funded private security companies. Finding a solution to the political situation in Somalia will be incredibly difficult, but a concerted and well-funded start must be made. The time for endless and multiple committee meetings that seem to produce very little must be drawn to an end, and must be replaced by a very strong indication of willingness to do something about the situation.

The IMO has published the theme for World Maritime Day 2011 (Thursday, 29 September 2011) as "Piracy: orchestrating the response". The industry has to continue its campaign to urge Governments to realise the gravity of the situation, and to bring the awful situation facing seafarers, their families and shipowners to a rapid end.

### 海盜

海盜是目前航運界最為關心的問題。索馬里地區的形勢已經讓業界無法忍受，對海員和船舶的生命財產安全構成嚴重威脅。航運界已經團結起來，在各種場合呼籲正視海盜問題，還提出了各種建議，包括更改 SOLAS 的有關條款，允許船上僱用保安人員自保；重新定義海盜行為級別以允許海軍改變防守為主的被動局面，採取先發制人的手段；允許船上配備有關的防海盜設備必要時候拘捕潛在的海盜等等。

政府顯然認為海盜局勢還不是特別嚴重，聯合國安理會的有關決議就說明了這一點。

目前海上形勢已經完全失控，最近出台的《最佳管理規範三》就好像在嚴重外傷傷口貼創可貼一樣無濟於事。海盜影響擴散至阿拉伯海及西印度洋地區看來已經無可避免，這些地區都是世界主要貿易進出口的要道。

協會多次重申，只能從岸上來解決此難題。這是聯合國的責任，而不是私營或政府資助的保安公司的責任。尋找索馬里地區的政治解決方法無疑很困難，但是必須有一個共同協作和資金充足的開始。各種無休止的委員會會議效果不大，應該儘快結束。必須馬上找到解決這個問題的切實可行的方法。

國際海事組織宣佈 2011 年 9 月 29 日為世界海事日，主題為“海盜：積極應對”。航運界應該繼續敦促政府瞭解事態的嚴重性，儘快結束相對船員、他們家屬和船東的糟糕局面。



### Maritime Labour Convention

It is perhaps clear by now that the initial objective of the ILO to bring the MLC into force within 5 years of its adoption will not go as planned; the current estimate for entry into force is now second half 2012. The delay is probably due to the enormous amount of work that Governments have had to undertake to incorporate the very different provisions of the Convention into their local laws and regulations. This was never going to be an easy task, and the economic upheaval of the last few years has probably made it more difficult.

As an indicator of our commitment to the tripartite ILO process, the Managing Director of the Association is now the maritime employer spokesperson for MLC and other ILO maritime sector meetings. We will continue this essential work, and also continue to promote the Convention, both within and outside the ILO, to encourage its proper and full adoption, which will greatly assist our goal of decent work for all seafarers.

### Shore Access for Seafarers

Shore access for seafarers seems to be becoming more and more difficult, resulting in a situation that one member has commented as seafarers being 'imprisoned on their ships'. Obtaining visas for seafarers in a reasonable period of time prior to their being sent to join a ship is notoriously difficult in many of the seafarer supply countries, and in any event, it would be impossible to know the nature of the visa required at the port where the seafarer would be due to sign off many months later at the end of his contract.

The situation is made even worse for seafarers joining or leaving ships at ports in the European Union. The Schengen Borders Code was meant to make the situation clearer and easier to comply with, but differing interpretations by different European States, lengthy visa application periods and common disregard of the guidance intended to assist seafarers that has been issued by the European Commission, has made the process almost impossible to work with.

Brazil is one country that has made its position clear. Seafarers holding a Seamen's Book or Seafarer's Identification issued by a State under the provisions of ILO Convention 108 or Convention 185, are permitted visa free access ashore. Obviously, if more States would ratify the Conventions, visa-free access or at the very least preferential treatment for seafarers, would become possible.

### 《海事勞工公約》

目前看來，國際勞工組織原來計畫在五年時間內使《海事勞工公約》生效的目標很難完成，現預計公約將於2012年下半年生效。造成耽擱的主要原因是各國政府將不同的公約條款納入本國的法律體系工作量巨大。這樣工作十分難度很大，過去幾年經濟的不景氣使這項工作更為困難。

為了表明協會積極參與國際勞工組織的三方機制，協會執行董事現已擔任《海事勞工公約》和其他國際勞工組織會議的海事雇主發言人。我們將繼續這項重要的工作，並將繼續在勞工組織內部和外部推廣公約，鼓勵更多的國家批准公約。這將大大幫助我們實現海員體面工作的目標。

### 海員上岸許可

海員上岸現在變得越來越困難，正如某個會員描述的那樣，海員現在“像囚犯一樣困在船上”。為船員在上船前獲得合理逗留期限的簽證在許多船員輸出國異常困難。多數情況下根本無法知道船員合同期滿後下船的港口所需簽證的性質。

船員在歐洲港口更換就更為困難。《申根入境條例》本意是澄清事實，使相關國家更易執行。但是不同歐洲國家對條例不同的理解，冗長的簽證申請期，對歐盟有關指引的忽略，使有關的簽證要求根本無法執行。

巴西是做得比較好國家。海員只要持有按照國際勞工組織108或185公約簽發的海員證或海員身份證，就可以無需簽證上岸。顯然，如果更多的國家批准公約，船員享受免簽證或其他優待就變得有可能。



ILO Convention 185 (Seafarers Identity Documents Convention (Revised) 2003) was adopted in 2003 by 392 votes, 20 abstentions and none against. The Convention came into force in February 2005, but still has only 18 ratifications. Convention 108, which preceded it, has 59 ratifications, but is now closed to ratification. With the unanimous adoption of Convention 185, it is difficult to understand why so many States have decided not to ratify it or follow its guidance.

Seafarers are a very special category of global worker, workers that must be given special treatment. It is contrary to the overriding principle of the ILO to ensure Decent Work that in this day and age, seafarers still are not able to obtain shore leave in many ports around the world.

### Cadet Training

In any maritime centre, there is a need for ex-seafarers for specific occupations. It is not always necessary to have ex-seafarers in positions that have traditionally been held by ex-seafarers, but there are specific occupations for which a person with seafaring experience is necessary. These include pilots, marine department surveyors, superintendents, etc.

In 2002, the Association began to seek its members' support to place Hong Kong cadets on their ships. A retired ship's master, Captain Tommy Lam, volunteered to assist the Association to persuade owners and managers to take Hong Kong cadets and to interview potential cadets and their families. We felt that it was very necessary to find the berths before recruiting cadets; we didn't want potential cadets becoming disillusioned with the industry because they were unable to find employment.

In 2004, the Hong Kong Government launched the Sea-going Incentive Scheme, to be monitored by the Maritime Industry Council and administered by the Marine Department, under which Hong Kong cadets would be given a monthly payment, paid in full in arrears on the successful completion of their contract.

The initiative has been an unqualified success. Thanks to Capt. Lam's stringent interviewing of potential candidates and the generosity of our members in offering cadet berths, a total of 93 deck and 43 engine cadets have been employed, nearly all of whom have stayed either at sea or ashore in the maritime industry. Many of our members have commented on how well the cadets have performed, fitting in well with crews of different nationalities and showing a very good dedication to the job at sea.

《國際勞工公約 185 號》(船員身份文件公約(修訂版)2003)於 2003 年以 392 票贊成，20 票棄權，0 票反對獲得通過。公約 2005 年 2 月生效，但是只有 18 個國家批准該公約。而之前的 108 號公約卻有 59 個國家批准，目前批准期已經截止。隨著 185 號公約的一致通過，很難理解為什麼這麼多國家至今尚未批准這個公約或者遵循有關的指引。

船員是全球工人中非常特殊的種類，應該獲得特別的對待。與國際勞工組織目前宣導的體面工作原則相反，海員在許多世界港口至今尚不能獲得上岸許可。

### 實習生培訓

任何海事中心都需要做過海員的人士從事某些特殊的職業。雖然現在這些特殊的職業不一定全部必須由海員來從事，但是仍有部分特別的工作必須由擁有航海經驗的來擔當。這些職業包括：領航員、海事處驗船師、機務總管等。



2002 年開始，協會要求會員支持安排實習生上船實習。林佩鴻船長，一位退休的船長自願協助協會勸說船東和管理公司安排香港實習生上船實習，並親自安排面試。我們認為在招聘實習生之前為他們

安排好船上培訓名額非常重要，我們不希望這些未來的實習生因為無法找到工作而沮喪。

2004 年，香港政府推出了航海訓練獎勵計劃，該計劃由航運發展局監督，由海事處負責具體實施。根據該計劃，實習生在受訓期內每月可以獲得一筆政府資助，僱傭合同完成後一次性支付給實習生。

這項計劃非常成功。感謝林船長嚴格面試有關的實習生申請人，感謝會員的慷慨支持。目前，已經有 93 個甲板部、43 個輪機部實習生為會員船隊工作了。幾乎所有的這些實習生均在海上或岸上的海事單位工作。很多會員對這些實習生好評如潮，讚揚他們與其它不同國籍的船員融洽相處，願意投身海上工作云云。



### Fair Treatment

We have commented extensively on this issue in the past, but it is necessary to maintain industry awareness because very little has changed.

The issue is several; fair treatment immediately post-accident in the way seafarers are treated by shore-based authorities, and fair treatment in cases of criminalization, where the criminal courts are used as punishment or apparent revenge rather than as a response to intentional acts.

A step forward is perhaps the Draft IMO Assembly Resolution of the 98th session of the IMO's Legal Committee, which encourages Governments to implement the Guidelines on the Fair Treatment of Seafarers following a maritime accident. But it is clear that many Governments underestimate the political pressure that follows a maritime accident, and the wish of the public to see strong action and find someone liable.

We will continue to work on this essential issue, and highlight instances of unfair treatment when and wherever they occur.

### Air Pollution

The Association has been heavily engaged in the both the local and global debate about air pollution for the last 6 or so years. We have spent time engaged with think tanks and environmental groups, explaining to them how the shipping industry works and how it is regulated. We have been fully engaged with global industry work on the revision to MARPOL Annex VI and subsequent discussions. And we have been working with other organisations around the world on local initiatives they have developed to reduce air pollution from shipping related activities.

### 公平對待海員

過去我們曾對此問題進行過廣泛的討論，現在仍然很有必要引起業界對此事的重視，因為至今情形沒有太大的改變。

主要問題是，發生事故後岸上當局公平對待海員以及刑事法庭公平對待海員的問題，不應該用報復懲罰的手段，而應該以回應國際行動的正常態度來處理有關的事故。

國際海事組織法律委員會第 98 屆大會決議草案的出台使問題獲得進展，該草案鼓勵政府執行《海事事故後公平對待海員指引》。但是，顯然很多政府低估了海運事故後的政治壓力，以及公眾要求採取嚴厲行動懲罰肇事者的意願。

我們將繼續研究這個重要的問題，並將在發生類似不公平對待事件後通知大家。

### 空氣污染

協會過去 6 年積極參加了本地和全球關於空氣污染的討論。我們參加了各種環保團體和智囊團會議，向他們解釋航運業的經營方式和相關法律。我們積極參與了全球業界關於 MARPOL 附件六修訂的討論。我們還與世界其他組織一起起草了有關降低航運及相關活動產生的空氣污染的建議。

We were therefore very pleased when the China Navigation Co Ltd decided to switch to low sulphur fuel on their ships calling in Hong Kong. And we were also very pleased when the Hong Kong Liner Shipping Association then decided to work with Civic Exchange to develop a voluntary Charter, the 'Fair Winds Charter', to switch to low sulphur fuel when alongside berth or at anchor in Hong Kong.

There are now 14 container carriers, 3 cruise lines and one car carrier line that have so far agreed to join the Charter. This represents at least 80% of the port calls in Hong Kong, and we greatly appreciate the very large financial commitment made by these companies towards reducing air pollution in Hong Kong. There are more companies that are considering joining the Charter, and we hope to be able to welcome them onboard in the near future.

We continue to urge the Hong Kong Government to follow this industry effort with further initiatives that include incentive measures designed to encourage industry participation and working with the relevant authorities on the Mainland for cross boundary emission cooperation that will encompass the entire Delta. Reducing ship related air pollution in Hong Kong alone will have a limited and very local effect on air quality; the goal has to be to reduce all industrial and transport emissions in the entire Pearl River Delta. Any initiative, however, needs to take into account the practical realities of the shipping industry, and similar ship emission policies of other regions in Mainland China.

### Greenhouse Gas Emissions

It is clear that there is an unfortunate stalemate in the Greenhouse Gas discussion that affects both the IMO and UNFCCC decision-making processes. There are many reasons for this, which are not for the Association to debate (although we do have our opinions!). But what we can debate are the challenges and potential drawbacks of introducing the Energy Efficiency Design Index for newbuilding ships, and the validity and potential effect of the introduction of a Market Based Mechanism.

The shipping industry (shipowners, managers and operators), has an exemplary record of reducing emissions by increasing efficiency. Ships have become many times more efficient over time, and on a 'carbon intensity' measure (carbon emitted against tonne-miles of cargo carried) the shipping industry has excelled at reducing carbon emissions. While there is economic benefit and technological potential in increasing efficiency, the efficiency of ships will continue to increase, with or without regulation. What we need to be aware of is regulation that seeks to do the right thing, but ends up threatening the safety of ships.

Maritime and aviation are also being fingered to provide the funds promised in Copenhagen by developed countries to the developing countries. The reason is that maritime and aviation have apparently been 'left out' of the Kyoto Treaty, which is not entirely correct. If maritime and aviation are to be used as funding sources, then we must ensure, as far as we can, that this is the only charge on shipping for GHG emissions, that we are not double charged, and that any regulation is developed by the IMO.

我們非常高興獲悉太古航運公司決定在旗下船舶掛靠香港時改用低硫燃料。我們也十分欣慰，香港班輪協會決定與思匯政策研究所合作，制定 'Fair Winds Charter' 憲章，鼓勵會員公司船隊在掛靠香港或錨地時改用低硫燃料。

目前已經有 14 個貨櫃公司、3 個郵輪公司同意加入憲章。這約占香港掛靠船舶的 80%，我們衷心感謝這些公司為了降低香港空氣污染方面所作的財政支出和承諾。還有很多公司正在考慮之中，我們期待他們在不久的將來加入憲章。

我們繼續敦促香港特區政府跟隨業界的步伐，儘快推出有效的方法，包括與內地有關部門合作，消除珠江三角洲地區的空气污染。僅僅降低香港地區的空气污染是不夠的，我們的目標是在整個珠江三角洲地區降低所有工業和交通引起的空气污染。但是，任何的解決方法還應該考慮到航運界和內地其他地區船舶排放政策的實際情況。

### 溫室氣體排放

目前有關溫室氣體排放的討論顯然已經陷入僵局，同時也影響了國際海事組織和聯合國氣候變化框架公約的決定進程。原因是多種的，協會對此也無能為力。但是我們能夠做的是，討論引入能量效率設計指數後對新造船的挑戰和潛在的問題，以及引入市場機制措施對我們的潛在影響。

航運界、船東和管理公司有降低排放同時提高效率的示範性記錄。船舶隨著時間的推移已經越來越高效率。通過“碳強度”措施（即：碳排放相對運載貨物的噸海里量），在降低碳排放方面可謂出類拔萃。由於提高效率有經濟效益和技術潛力，就是沒有法規的要求，船舶的效率也會提高。我們應該瞭解到，法規的出發點可能是好的，但是結果往往是反而影響船舶的安全。

海運和航空在哥本哈根被發達國家指定為提供有關基金的行業。理由是《京都協定書》顯然漏掉了海運和航空兩大行業，然而事實並非完全如此。如果海運和航空用作基金來源，那麼就必須保證有關溫室氣體排放賦予我們行業的費用僅此而已，不得重複收費，有關的法規也必須由國際海事組織制定。

There are currently 10 MBM options being considered by the IMO working group, and it is interesting that while economists seem to prefer an Emission Trading MBM, many shipping associations, including this Association, clearly prefer an MBM based on a levy on bunker fuel. Such a system would be simple to administer and would make it easier to pass the additional costs on to the consumer.

### Ballast Water Management

In response to concerns that ship's ballast water contained organisms that were foreign to the waters where the ballast water was discharged, upsetting the natural order of marine life, and in an effort to ensure that ballast water regulations were globally consistent, the IMO developed and adopted in 2004 the International Convention for the Control and Management of Ship's Ballast Water and Sediments (BWM Convention). It is expected that the Convention will achieve the necessary number of ratifications to enter into force in the near future.

The Convention was developed with fixed entry into force dates, both as a response to the urgency of application expressed by some States, and also to encourage the fast development of suitable technology to meet the requirements of the Convention. Ballast Water Management systems are approved by either the Administration or, if they make use of active substances, by the IMO.

In response to the lack of suitable treatment systems, the IMO recommended that the application of the Convention to ships built in 2009 should be postponed until their second annual survey, but no later than December 2011. A later review determined that sufficient systems were available and that the application of the Convention requirements to ships built in 2010 would stand.

But the approval of ballast water systems is only to approve the technology, and is not an indicator as to whether systems have been developed and are available for all sizes of ship. Also, the large number of systems that will be required combined with limited manufacturing capacity mean that some ships are unable to fit the required systems in the time laid down in the Convention. And furthermore, it is obvious that the first systems to be developed might not be the best or the most suitable, and are probably also the most expensive, giving owners encouragement to delay fitting the necessary equipment until the last moment.

The Association is assisting its members to comply with the requirements of the Convention, but it is incumbent on Governments to realise that fixed entry into force dates for legislation that deals with issues for which the technology does not exist, are quite simply not a good idea.

### Arthur Bowring

Managing Director

目前有 10 種市場機制措施提交給國際海事組織工作小組研究。有趣的是，許多經濟學家傾向於排放貿易市場機制措施，而航運團體包括本協會則傾向於徵收燃油稅的市場機制措施。這種體制簡單易管理，也容易將額外的費用轉嫁給消費者。

### 壓載水管理

為了回應有關船舶壓載水含有外來生物，將會擾亂壓載水排放國家水域的海洋生物自然平衡，也為了保證壓載水法規在全球的一致性，國際海事組織於 2004 年制定並通過了《國際船舶壓載水和沉積物控制與管理公約》(簡稱《壓載水管理公約》)。據估計，公約在不久的將來將達到要求的批准國家數量正式生效。

該公約制定時規定了固定的生效日期，主要是考慮了有些國家迫切希望公約生效的意願，同時也鼓勵儘快發展有關的技術滿足公約的要求。壓載水管理系統通常由政府有關部門批准，但是如果涉及活性物質必須由國際海事組織批准。

為了回應缺乏合適處理系統的抱怨，國際海事組織建議 2009 年建造的船舶推遲至第二次年檢後才適用此公約，但不得遲於 2011 年 12 月。後來經過調查發現有關的處理系統已經足夠，因而公約對 2011 年建造船舶的最初要求不變。

但是批准壓載水系統只是批准有關的技術，這不表明有關的系統是否為所有噸位的船舶建造。同時，由於要求的系統數量巨大而生產廠家有限，這意味著有些船舶可能無法按照公約規定的期限安裝有關的系統。另外，第一批生產的系統可能不是最好的或最合適的，可能還是最昂貴的，這樣會使船東選擇最後一刻才安裝有關的系統。

協會將在履行公約要求方面為會員提供協助。但是政府應該瞭解：為不存在的技術制定法規並規定固定的生效日期，雖然簡單但決不是好主意。

執行董事

包榮