

InfluenceMap's response to IMO and trade association comments on our report: **Corporate capture of the IMO**

October 25th - Following today's [statement](#) from the UN International Maritime Organisation (IMO) Secretary General and recent comments from industry trade associations, InfluenceMap would like to offer the following response.

General response to comments on report

Our methodology for assessing corporate influence over policy has been deployed in a variety of sectors, policy areas and geographies and is well regarded by the investment, [media](#) and business communities. It is based on a breakdown of the policy area into key sub issues and assessment of how a company or trade association engages with these issues over a wide range of information sources, including: submissions by the companies to the official regulatory consultation process, corporate web sites, media coverage of press releases and CEO messaging; government disclosures of policy maker-private sector meetings and emails released via freedom of information requests by InfluenceMap. Nearly 100 pieces of evidence on the three main shipping associations at the IMO (ICS, BIMCO and the WSC) were assessed to create a systematic view of their positions on shipping/greenhouse gas emissions policy.

This contrasts with recent responses to our report which attempt to refute these systematic conclusions with isolated and often subjective statements not borne out by a thorough review of the relevant data.

Specific comments on the response from World Shipping Council (WSC)

WSC [state](#) 'that they offer concrete proposal for both short and long-term carbon reductions' and highlight a policy submission on climate action, (MEPC) 71/7/4, they co-submitted earlier this year. In this [submission](#), WSC offers three proposals to reduce emissions in the shipping sector, none of which include binding sector-wide GHG emissions reduction targets or caps.

In this submission WSC also stated support to "periodically review and modify EEDI energy efficiency standards to promote the introduction of increasingly carbon-efficient tonnage in the maritime fleet", a proposal which does not include explicit support for increasing the strength of the EEDI standards. No evidence collected suggests WSC maintains such a supportive position, with our report detailing how WSC has instead [actively lobbied](#) against the introduction of operational energy efficiency standards. This is despite a 2016 UMAS [study](#) revealing that current EEDI targets are so weak that they will only deliver a 3% greenhouse gas emission reduction by 2050, compared to a scenario without the EEDI in place.

The World Shipping Council (WSC) also claims that InfluenceMap is "spreading misinformation" through (correctly) suggesting that the Paris Agreement is "legally binding". The treaty may not be

enforceable, but it contains mostly binding elements, some non-binding measures, and other parts that are more aspirational. The shipping industry would perhaps benefit from studying the treaty in greater detail.

Specific comments on the response from International Chamber of Shipping (ICS) and BIMCO

ICS have argued that the number of documents submitted by industry ahead of meetings shows how seriously they take the project of reducing CO2 emissions in shipping. Yet analysis of the content of these documents demonstrates their failure to support any effective climate action in line with a 2C global warming target. For example, in 2017 ICS and BIMCO [rejected](#) calls in a joint IMO submission to introduce a binding GHG emissions target or cap for shipping, supporting only a voluntary “aspirational” reduction target, [reasserting](#) this position in September 2017. Additionally, in 2016 ICS, BIMCO and WSC co-sponsored an IMO policy [submission](#) that opposed the introduction of GHG emissions regulations for the shipping industry until 2023, 7 years after the Paris Accord first came into effect and 26 years after the Kyoto Agreement granted the IMO the authority to regulate climate policy for shipping.

The influence of these trade associations at the IMO is significant. ICS brought more representatives (16) to the last IMO MEPC environmental meeting in July 2017 than 85% of states.

Specific comments on the response from the International Maritime Organisation (IMO)

The Secretary General of the IMO today responded to our report by arguing that the “participation of organizations representing so many viewpoints provides a balance that adds considerably to the credibility of the Organization's overall output”. However, the extensive corporate influence our report has revealed in the IMO suggests this balance is clearly tilted in the favour of shipping industry interests, who are actively working to oppose meaningful action on climate.

"InfluenceMap has a systematic and data driven approach to assessing corporate and trade association engagement with policy and regulations. It has been applied successfully to drive objective debate and positive change within the global climate policy agenda. We certainly hope this can happen in the context of global shipping and stand by the conclusions of our report."

Dylan Tanner, Executive Director, InfluenceMap