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SHRIDATH RAMPHAL CENTRE
INTERNATIONAL TRADE LAW, POLICY AND SERVICES

CARIBBEAN SHIPPING LANES

UNITED NATIONS FOUNDATION

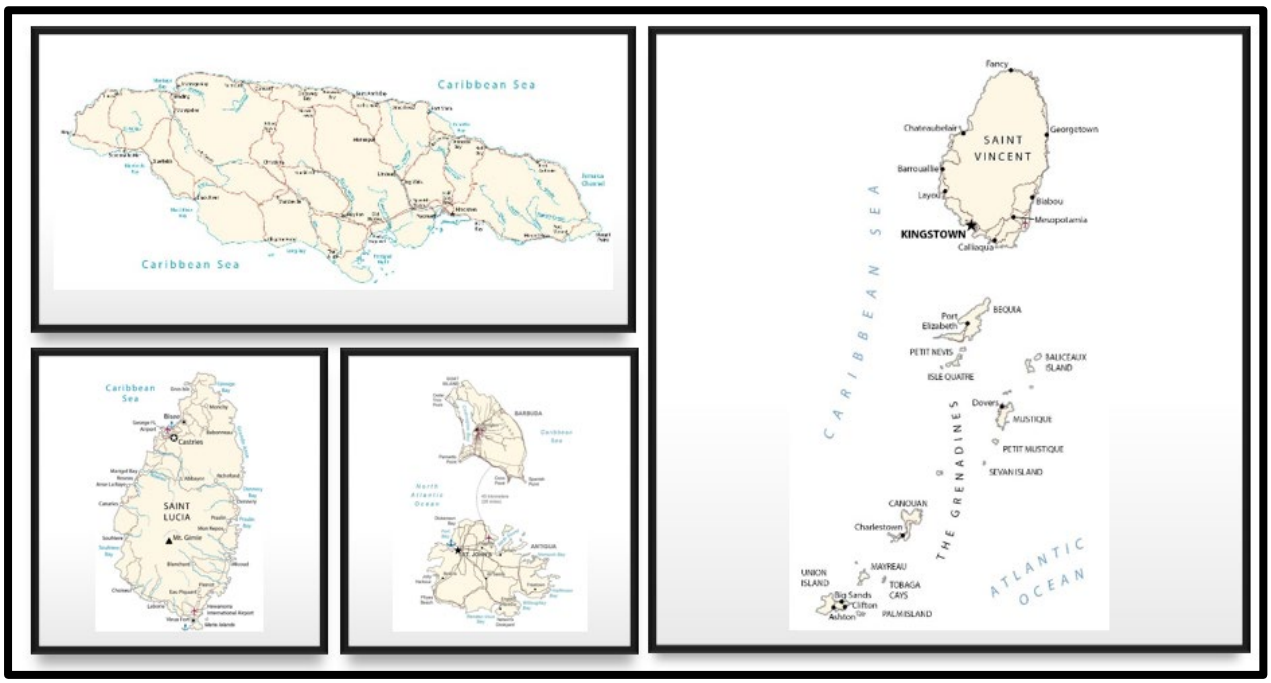
# Stakeholder Engagement Study **Focus Group Discussions Report**

**Prepared For :**
Caribbean Shipping Lanes (CSL)

**Prepared By :**
Rosemarie Cadogan

# STAKEHOLDER ENGAGEMENT STUDY

## FOCUS GROUP DISCUSSIONS REPORT

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# Abbreviations and Acronyms

| | |
|---|---|
| CIA | Comprehensive Impact Assessment |
| CII | Carbon Intensity Indicator |
| CMU | Caribbean Maritime University |
| GFS | Global fuel standard |
| GHG | Greenhouse gases |
| GT | Gross tonnage |
| IMO | International Maritime Organisation |
| ISWG-GHG | Inter-Sessional Working Group on Reduction of GHG Emissions from Ships |
| JET | Just and equitable transition |
| MEPC | Marine Environment Protection Committee |
| MTCC- Caribbean | Maritime Technology Cooperation Centre - Caribbean |
| UCL | University College London |
| UNCTAD | United Nations Trade and Development |
| WtW | Well to wake |

# Scope and Rationale

| | |
|---|---|
| 1) Project Title: | Caribbean Shipping Lanes Stakeholder Engagement on the Impacts of Proposed IMO Maritime GHG Reduction Measures |
| 2) Geographical Focus: | Antigua and Barbuda, Jamaica, Saint Lucia, Saint Vincent and the Grenadines |
| 3) Scope | Caribbean Region |
| 4) Sustainable Development Goal(s) (SDGs) addressed | SDG 7, 9, 12, 13 |
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# EXECUTIVE SUMMARY

The Caribbean Shipping Lanes Project (CSL) of the Shridath Ramphal Centre (SRC) of The University of the West Indies, in partnership with the United Nations Foundation and The Belize Port Authority, is providing technical support to Caribbean countries in the ongoing negotiations at the International Maritime Organisation (IMO) on the mid-term measures to implement the 2023 IMO Strategy on Reduction of GHG Emissions from Ships (the GHG Strategy). The CSL commissioned a series of focus group or stakeholder engagement sessions aimed at gathering qualitative data regarding the potential impact of the mid-term measures on the import and export of essential goods, food security, livelihoods, port infrastructure and climate change mitigation and adaptation measures.

The GHG Strategy enhances IMO's contribution to global decarbonization efforts by addressing GHG emissions from international shipping. This includes identifying actions to be implemented by the international shipping sector as appropriate, while addressing its impacts on States and recognizing the critical role of international shipping in supporting the continued development of global trade and maritime transport services.

As noted in Position Paper 17/2/18 submitted by Antigua and Barbuda, Belize, Dominica, Grenada, Jamaica and Saint Lucia, the economic stability and growth of the Caribbean region is reliant on its maritime sector. As climate change impacts intensify, the need for globally coordinated strategies to finance and secure technologies for decarbonizing the maritime sector is critical.

The four Caribbean countries engaged in the focus group discussions, namely Saint Vincent and the Grenadines, Saint Lucia, Jamaica, and Antigua and Barbuda share commonalities and sustainable development challenges associated with SIDS. These include remoteness, small populations, dependence on ocean resources, reliance on imports, limited access to finance, and vulnerability to climate change impacts. (Following ISWG-GHG 18, three more discussions were held in March 2025 in Trinidad and Tobago, Grenada and Saint Kitts and Nevis. The report from these discussions will be published in a subsequent report.)

This Report provides feedback collected from stakeholders during these discussions and can support negotiators and policymakers in developing strategies for building economic resilience and achieving a just and equitable transition. These qualitative insights are intended to complement the ongoing quantitative study conducted by the University College of London (UCL) and the Caribbean Maritime University (CMU) under the CSL project. These assessments examine the cost impacts of implementing the IMO’s mid-term measures on import and export trades across various commodity

types. By aligning qualitative findings with quantitative data, the study aims to refine policy recommendations and strengthen the Caribbean's advocacy in the IMO negotiations, ensuring that regional interests are effectively represented.

Stakeholders from diverse national agencies, including Chambers of Commerce, Maritime Administrations, shipping agents, government departments, and Ports Authorities, participated in the sessions. Each session attracted 20-25 attendees on average, facilitating rich, interactive discussions with experts involved in the negotiation process. This approach not only built stakeholder capacity regarding the complex terminology and processes of the IMO negotiations but also helped identify knowledge gaps and areas for further national-level engagement.

Although there were varying degrees of awareness and familiarity with the subject matter, we learned from stakeholders that there is a desire to know more about the Strategy and its mid-term measures.

There is a strong feeling that resource allocations should enable a just and equitable transition. This is particularly appropriate as Para 4.5 of the Strategy provides that when developing candidate mid- and long-term GHG reduction measures, due consideration should be taken to ensure a just and equitable transition that leaves no country behind, including supportive measures.

Participants expressed significant concern about the potential financial burden the measures might impose, particularly in terms of shipping costs and the downstream impact on import and export prices. There was apprehension that the levy could exacerbate existing vulnerabilities related to food security and economic stability, given the Caribbean's heavy reliance on maritime trade.

Several stakeholders highlighted the potential trickle-down effect of the levy on consumers, suggesting that increased shipping costs could lead to higher retail prices for agricultural and fishing supplies, as well as food and essential commodities. This concern was particularly pronounced in discussions with private sector representatives, who emphasized the challenges of maintaining competitive pricing in small, import-dependent markets.

A recurring theme throughout the sessions was the need for transparent governance mechanisms related to the collection, management, and disbursement of revenue generated by the levy. Stakeholders voiced concerns about how funds would be allocated and whether Caribbean nations would receive equitable support to facilitate a just and equitable transition (JET).

There was strong sentiment that funding mechanisms should prioritize local needs, particularly in enhancing port infrastructure, upgrading fleets, and supporting small and medium-sized enterprises (SMEs) in the maritime sector. Additionally, participants

advocated for a structured approach to ensure that revenue supports climate change adaptation and mitigation initiatives beyond the maritime sector, aligning with broader national development goals.

Participants also highlighted the need for policy coherence between the GHG Strategy and national strategies, as well as existing legal and regulatory frameworks. Aligning international maritime decarbonization measures with local policies on trade, transportation, energy, and climate resilience would facilitate smoother implementation of the GHG Strategy, enhance regulatory certainty for businesses, and support national development objectives. Moreover, integrating the GHG Strategy with national frameworks could create synergies in achieving broader sustainable development goals and foster a unified approach to climate action in the maritime sector.

Participants underscored the critical need for regional cooperation to enhance the Caribbean's negotiating power at the IMO and to coordinate regional approaches to help mitigate the potential negative impacts of the GHG Strategy's mid-term measures. Given the interconnected nature of Caribbean economies and the shared reliance on maritime trade, there is a need to ensure that trade and environmental priorities are strategically aligned. By harmonizing trade policies, environmental strategies, and maritime regulations, Caribbean states can create a unified front that promotes economic resilience, environmental sustainability, and facilitates a JET. Strengthening regional institutions and fostering cross-border initiatives, such as joint investments in green port infrastructure and shared access to decarbonization technologies, could amplify the region's ability to adapt to global shipping standards while safeguarding local interests.

# 1. Introduction

The Caribbean Shipping Lanes Project, under which this study is based, is geared towards ensuring that the Caribbean's maritime interests are protected during the IMO GHG Strategy negotiations, considering the region's unique challenges.

As negotiations continue through February and March 2025, with adoption of the measures expected in April 2025, the SRC commissioned three interlinked studies to evaluate the economic, social, and legal implications of the IMO's GHG emissions reduction measures on the Caribbean. This work is particularly urgent, as the proposed measures could significantly impact regional food security, economic resilience, and the principles of a just transition in the region.

This report focuses on the conduct of four stakeholder workshops held in Saint Vincent and the Grenadines, Saint Lucia, Jamaica, and Antigua and Barbuda, conducted over a two-week period from January 20th to 31st 2025. These sessions, structured in a hybrid workshop and focus group format, aimed to collect qualitative insights from government officials, industry representatives, and community leaders. The discussions centred on understanding the implications of the proposed GHG reduction measures and gathering perspectives on critical issues such as food security, economic stability, and socio-economic development.

Trinidad and Tobago, Grenada, and Saint Kitts and Nevis formed part of the second phase, with consultations held in Trinidad and Tobago on March 10th and 11th 2025, Grenada on March 17th and 18th and in Saint Kitts and Nevis on March 20th and 21st, 2025. Dominica is exploring potential dates for engagement.

The workshops were guided by the MEPC Revised Procedure for Assessing Impacts on States of Candidate Measures. (MEPC.1/Circ.885/Rev.1 of 7 February 2023). This framework emphasizes the need to consider the specific circumstances of developing countries, especially SIDS and LDCs. Key areas of focus included geographic remoteness and connectivity to main markets, cargo value and type, transport dependency, transport costs, food security and cost-effectiveness.

Shipping plays an integral part of the region's economic development. Agricultural products, manufactured goods and energy resources are shipped across the Caribbean region, contributing to its economic interdependence. As the regional position paper ISWG 17/2/18 notes, the region exports minerals, agricultural products and manufactured items, while importing machinery, transportation equipment, and consumer goods.

Antigua and Barbuda and Saint Lucia rely heavily on the tourism industry, (including cruise tourism) which accounts for over 50% of Saint Lucia's GDP, and nearly 60% of GDP and 40% of investment in Antigua and Barbuda's economy.

Caribbean nations are predominantly net food importers and source approximately 90% of their food from external markets. The USA supplies up to 94% of imports for 15 CARICOM countries (Forgenie, Hutchinson et al., 2024; CARICOM et al., 2021). The region's dependency on imported food makes it particularly vulnerable to disruptions in shipping and trade routes. During the COVID-19 pandemic, for instance, transport disruptions led to significant food price inflation, highlighting the fragile nature of Caribbean food security (Daly, Isaac 2022).

Focus group consultations provided stakeholders with a platform to understand the status of ongoing economic research, voice concerns, and offer qualitative insights into the potential impacts of technical and economic measures. These measures include the proposed carbon pricing mechanism and a global marine fuel standard, which could affect key sectors such as agriculture, freight, and fuel distribution.

Stakeholders were drawn from a range of national agencies including Chambers of Commerce, Maritime Administrations, shipping agents, government departments, and Ports Authorities. On average, 20-25 persons attended each session. Presentations by experts from the CMU and UCL provided necessary technical expertise and enhanced stakeholders' understanding of the terminology, issues and procedures involved.

# 2. Limitations

The timeframe for staging the stakeholder engagement focus groups was short, a factor that precluded expanding discussions to other Caribbean SIDS during the first phase.

Timeliness also influenced the decision to adopt the focus group format, rather than the use of surveys questionnaires to key stakeholders. While the direct, in-person engagement format was effective, time constraints limited much of the primary data collection from which some projections could be validated. Follow up efforts are continuing.

The discussions were initially conceptualised as one-day workshops to be followed by focus group discussions on the second day. Due to time and logistics considerations, the consultations were compressed into a half-day information session and focus group discussion, with the option of conducting one-on-one interviews on a second day.

We found that more focused engagement ensued when key persons attended the sessions, which underscores the importance of having the right people in the room. In most cases, Ministries of Foreign Affairs, Departments of Customs and Departments of Trade were absent, and with one exception, shipowners representatives did not participate. Tropical Shipping, a major player in the Eastern Caribbean which conducts weekly service from Florida to the Windward and Leeward Islands, attended the session in Saint Lucia. Other shipping lines such as Seaboard Marine which plies the Florida Caribbean route weekly, Geest Line which travels from Northern Europe to the Eastern West Indies, King Ocean Services and CMA CGM were not represented in the sessions.

# 3. Methodology

Countries were selected using quota sampling, based on their predefined characteristics as Caribbean SIDS. Each of the countries being examined is:

a. Part of the economic modelling by the UCL and the CMU either alone or as part of the Rest of the Caribbean (ROC) as defined in the UN Trade and Development (UNCTAD) study commissioned by the IMO;
b. Participating as part of the Caribbean region's delegations at the negotiations;
c. Co-sponsoring position papers, information papers before the ISWG and/or the MEPC, thereby indicating an awareness of the issues and desire to participate in and influence the negotiations.
d. Priority was given to signatories of MARPOL Annex VI

Participants were selected using purposive sampling, based on their potential to provide valuable technical and experiential insight into the issues being studied. Stakeholders were drawn from maritime clusters, or an agglomeration of interlinked industries in each country (Doloreux, 2017). These clusters include shipping, ports and logistics, maritime finance and law, and maritime technology, with the port sector playing the most active role. (Shinohara, 2010); (Xin Shi, Haizhou Jiang 2020).

In planning the in-person country visits, the consultant engaged in feasibility assessments with Directors of Maritime Administrations (MARADs), to refine participant selection, invitations, logistics, agenda development, and follow-up coordination. Collaboration with in-country focal points was crucial for obtaining support and building stakeholder engagement.

The development of the questions drew on methodologies from the Comprehensive Impact Assessment (CIA) of the basket of candidate GHG reduction mid-term measures. (Task 4 (Stakeholders' analysis). The consultant worked closely with UCL and CMU and the respective Maritime Administrations to refine the inquiry process, resulting in a focused set of 12 questions that guided discussions. The question set is attached as Appendix 1.

Cognizance was taken of the African Policy Research Institute's methodologies in assessing the economic impacts of a shipping carbon tax for African states, by adapting relevant approaches used in the Ghana case study to the Caribbean context. (Africa Policy Research Institute 2024).

The sessions included a mix of stakeholders from government, private sector, and maritime clusters, facilitating robust discussions and insights e.g. Government:

(Attorney General's Chambers, Fisheries, Sustainable Development Unit, Ministry of Commerce) and private sector: (Chamber of Commerce, Shipping Associations and companies, freight brokers). The stakeholder list is attached at Appendix 2.

Each MARAD negotiator provided an overview of their country's participation in the negotiations. Presentations from CMU and UCL experts on the composition of the measures, the research and the status of the negotiations, enhanced participants' understanding of the measures and negotiation processes.

Feedback from participants ensued, followed by discussion using the structured questions. Proceedings in Antigua and Barbuda spanned two days with focus group discussions on the 2nd day.

# 4. Key Findings

## 4.1. Knowledge and understanding about the levy and other mechanisms

Participants' knowledge of the Strategy was limited, generally to approximately 5% to 10% of participants, a ratio which included Maritime Administrations officials familiar with the work of the IMO. Several participants indicated their motivation for coming to the session as stemming from a desire to learn more about the issue and to share pertinent information. For others, given the operational or environment-related nature of their work e.g. in fuel production, transport storage or freight brokerage, knowledge of potential implications of the Strategy would enable better business decisions. Articulating the private sector voice on the issue was important for private sector organisations.

## 4.2. Terminology: To which ships would the levy apply?

Position Paper 17/2/18 proposes that the technical measure, a well to wake (WtW) approach for GHG Fuel Intensity (GFI) standards, should apply to all ships of 400 gross tonnage (GT) and above.

MEPC 70 amendments to The International Convention for the Prevention of Pollution from Ships (MARPOL) Annex VI in 2016 established the data collection system for fuel oil consumption of ships. By this, ships of 5,000 GT and above (representing approximately 85% of the total GHG emissions from international shipping) are required to collect consumption data for each type of fuel oil they use, as well as other, additional, specified data including proxies for 'transport work.'

Caribbean commercial ships that supply intra-regional trade, tend to be under 500 GT. The Code of Safety for Caribbean Cargo Ships, which provides a regional safety standard and pollution prevention for cargo ships, applies to cargo ships of less than 500 GT including oil tankers and tankers, irrespective of length, engaged on international voyages trading in the Caribbean Trading Area.

As the discussions continued, gaps in understanding the application of the mid-measures' and attendant terminology became apparent. Participants sought clarification in relation to which international ships would be covered by the measures (e.g. whether those of 400GT, 500 GT or 5000 GT), and how and when domestic fleets might be impacted.

For regional shipowners and other stakeholders, the application of the mid-term measures to ships by virtue of a specific gross tonnage, and the timing of such application is important, given that Caribbean negotiators' favour a global fuel standard with a high levy and a revenue mechanism to incentivise the reduction of emissions through improvements to energy efficiency, to generate revenue for improvement of the fleet, and for disbursements to aid in accomplishing a JET, among other things.

This remains a matter for clarification, as ISWG-GHG 18 agreed to maintain the application of the measures to ships of 5000 GT and above, with consideration of its application to ships of 400 GT and above at a later date.

## 4.3. Direct and Indirect Impacts of the levy

Position Paper 17/2/18 (ISWG-GHG 17/2/18 9 August 2024) proposes that the economic measure, a universal levy on shipping emissions, should ensure that all carbon emitters contribute proportionately, based on the "polluter pays" principle. It should generate substantial funding for just and equitable transition projects in the Caribbean, both in the maritime sector and out of the sector and be set at a level that effectively incentivizes the shift to green fuels and technologies, while also providing financial resources for broader socio-economic and climate change needs.

Participants were interested in understanding the costs and impacts of the levy. Doubts were cast on mechanisms for purchasing credits through a flexibility pooling mechanism which could amount to a way of getting around emissions, leaving vessels able to continue polluting. It was felt that a fee should be set at a rate significant enough to deter polluters.

Stakeholders expressed concerns that a high levy could trigger persistently high freight costs, which, once elevated, might not decrease. Many feared that shipping lines, once empowered to pass on costs, might not align these increases proportionately with the actual impact of the levy on their operations. The Caribbean region, already under pressure from high freight rates, could see small businesses' profit margins shrink, exacerbating food insecurity and limiting livelihoods.

Expert presentations indicated that a high levy scenario could result in considerably greater economic impacts than alternative measures such as a GHG fuel intensity (GFI) standard that mandates a shift away from fossil fuels or "feebate" mechanisms that return a portion of the levy as subsidies or rewards. (Stewart, 2025). Potential impacts of a levy, whether high or low, include higher imported food prices, reduced competitiveness of Caribbean exports and supply chain inefficiencies that could worsen economic conditions.

Initial assessments from the UCL economic study suggest increased vulnerability for smaller, less integrated Caribbean economies. SIDS such as Saint Lucia and Antigua and Barbuda, which already face high transport costs and limited integration into the global transport system, are projected to experience more severe impacts.

The study found that transport costs as a percentage of trade value could increase by 50% to 80% across the six commodities studied. This could lead to price hikes for essential goods and exports, making them uncompetitive and potentially resulting in market share losses. Notably, the modelling exercise did not factor in the potential positive application of levy-generated revenues.

Lower-valued commodities are particularly vulnerable, as higher transport cost rates could represent a larger share of total costs. For imports, this means stronger impacts on lower-valued essential goods, such as food and agricultural products, contributing to rising domestic supermarket prices. On the export side, Caribbean products, such as Jamaican bauxite could struggle to compete in global markets due to higher transport costs.

Participants understood that the mid-term measures will come at a cost to the Caribbean region. This notwithstanding, they were resolute that negotiations should press for revenue disbursement to mitigate the anticipated impacts.

## 4.4. Addressing Procedural inefficiencies

Participants noted that transport costs in the Caribbean are notably higher than the global industry standard of approximately 11% of freight costs, with rates potentially reaching 18%, 24%, or even 30%. This is partly due to the region's dependence on maritime and road transportation, as opposed to the more diversified multimodal systems (sea, rail, air, highways) used internationally.

Participants noted that high port charges, outdated systems where customs officers are attached to warehouses rather than container terminal ports, and bureaucratic customs procedures relying on containers remaining in the port and Customs officers visiting businesses to clear containers after working hours, contributed to delays and increased costs. These challenges are particularly impactful for business owners who rely on timely deliveries to meet high-traffic sales periods.

There are diverse reasons for higher transport costs, including economies of scale in ports and shipping, trade composition, the value of goods, sea freight rates, insurance premiums, competition levels, port dues and tariffs, and waiting times in ports (ECLAC 2020). Other contributing factors include distance, connectivity, whether trading partners are neighbouring countries, and national characteristics such as GDP per capita (ECLAC 2009). The study conducted by the UCL team aims to identify these

issues in greater detail, offering insights for policymakers when addressing transport cost inefficiencies in the Caribbean.

Participants noted that it was sometimes difficult to spot increases in essential products, as importers tended to spread costs across different products. They emphasized the need to review procedural inefficiencies at domestic ports to mitigate some of the levy's impacts and reduce the burden on consumers. Suggestions included examining duplicative charges by ports and carriers before goods clear customs, stabilizing stacker prices, and investing in equipment to expedite truck loading.

To offset potential increases in port charges, participants called for improved operational procedures and the reduction of leakages, such as those caused by uncustomed goods. Streamlining international trade facilitation, domestic logistics, and administrative processes could help reduce costs ahead of higher expenses associated with the universal levy.

## 4.5. Revenue Mechanisms

Participants considered revenue disbursement as a source of concern. Although the specifics of a possible mechanism have not yet been determined, there is interest in ensuring that governance arrangements concerning the determination of, collection and application of revenue generated from a levy would operate transparently and fairly, if agreed to and finalized.

Participants acknowledged that access to a Fund mechanism was not guaranteed, and shared experiences with climate change pledges which were not as expected. Participants also questioned how the intersection of the Strategy's measures with climate change mechanisms would be managed to avoid duplication when implemented as an amendment to MARPOL Annex VI.

Participants advocated for a balanced approach to revenue disbursement that addresses both maritime (in-sector) needs and broader (out-of-sector) climate and development goals. This should reflect the countries' need to adapt to climate change impacts, not based on the size of their economy, as SIDs need special treatment. The preference expressed by participants for the IMO to maintain oversight and management of the revenue disbursement process, reflects a desire for maintaining maritime-specific expertise aligned with the shipping sector's decarbonization targets.

However, participants' debates over the IMO's capacity to manage project-level disbursements points to a potential governance challenge. Coordination between revenue mechanisms being considered by the IMO through a Fund Manager, and

those managed by Nationally Declared Contributions (NDC) Registries maintained by the UNFCCC Secretariat (UN Climate Change) also remains an important area, particularly if consideration is to be given to revenue allocation through the mid-term measures for meeting broader climate change adaptation targets.

Potential procedural avenues for the GHG Strategy Implementation Fund, including cooperation with international environmental organisations and related matters are addressed in the Legal Guide for the Caribbean on the IMO Greenhouse Gas (GHG) Strategy (Legal Study).

## 4.6. The CII and short-term measures

Participants from the southern Caribbean (Saint Vincent and the Grenadines and Saint Lucia) expressed strong interest in mitigating the impacts of short sea shipping and the Carbon Intensity Index (CII), a short-term measure under the IMO GHG Strategy. They noted that newer ships, approximately six years old, struggled to attain 'A' or 'B' ratings due to the nature of the regional routes, which typically involve multiple stops and short transit times, often under 14 hours.

Concerns were raised about the fairness of the CII calculations, which seemed to favour deep-sea, long-haul vessels operating on major east-west corridors (e.g., China to Europe, China to the US), over smaller ships with lower cargo capacity (around 1,000 TEUs) serving short routes in the Caribbean. Larger vessels on long-haul routes could carry over 20,000 TEUs, highlighting the disparity in CII outcomes.

Caribbean nations have co-sponsored a submission to the MEPC on the impact of the CII on Ships in the Caribbean Trade, which includes findings from an MTCC-Caribbean study. (MEPC 82/INF.48 26 July 2024). The study highlighted that while the IMO allows for adjustment and correction factors in CII calculations for certain ship types and operations by removing certain periods of their operation or by reducing the CII value based on specific criteria, Caribbean vessels face unique challenges. These include short voyages between islands, long port stays due to inadequate infrastructure to enable efficient cargo handling, cruise ships' priority berthing, limitations in the size of ships that could be accommodated and the lack of green shore power.

These challenges were emphasized during discussions in Saint Lucia where the cruise industry is vital to the economy. Participants stressed the need to improve cargo and cruise ship transitions and invest in alternative fuel and shore power capacity to minimize emissions in port. However, the cost and practicality of such investments were questioned for smaller economies like Saint Lucia and Saint Vincent and the Grenadines.

There was a consensus that port inefficiencies and the inability to maintain favourable CII ratings could negatively impact the Caribbean region. Poor CII ratings might lead to reduced charter and cargo hires, unwanted schedule changes for ships servicing the region, and potential increases in insurance premiums for poorly rated cargo and container ships.

A particular challenge for Saint Lucia is the dichotomy between the economic benefits of extended cruise ship stays in port, and the operational need for swift turnaround times for cargo vessels. Limited port capacity often prioritizes cruise ships over cargo ships, with attendant logistics delays. This raises the possibility that the latter will utilize more efficient neighbouring ports, resulting in economic losses.

Addressing these inefficiencies requires investment in infrastructure and operational improvements for better servicing of cruise and cargo ships. However, the financial and logistical burden of implementing alternative fuels or shore power solutions remains a significant barrier for smaller island nations such as Saint Lucia and Saint Vincent and the Grenadines.

The GHG Strategy provides that the potential synergies with other existing measures such as the CII will be considered in relation to incentives for energy efficiency, and the adoption of better operational practices in the shipping value chain, or other technologies to reduce emissions from ships.

The MTCC study recommends revising the current CII framework to account for short voyage distances and the application of an associated correction factor that reflects the unique operating conditions of Caribbean vessels. The study also suggests the implementation of operational measures to improve energy efficiency of ships while in port, enhanced regional cooperation for a more cohesive maritime network, prioritizing ports infrastructure development, and conducting further studies on ship and port performance indicators are also advised by the Study. The Legal Study supports these considerations. Participants were informed of ongoing research and the scheduled CII revision in January 2026.

## 4.7. Global Fuel Standard and emissions reduction

Participants viewed the global fuel standard as incentivising ships to reduce their GHG emissions by switching to alternative and cleaner fuels over time as part of a transition toward lower-emission alternatives. This dual approach to reducing emissions in the maritime sector was worthwhile as it would help in the reduction of GHG emissions from shipping, increase the production and use of low and zero GHG fuels and create

a level playing field for global shipping companies. A global fuel standard would give countries exercising port state control, one standard to apply to all ships.
Participants also considered global GHG emissions reduction and the risk of transferring the problem to other sectors such as energy. This is referenced in the Strategy which notes that the development of the basket of candidate mid-term GHG reduction measures should take into account the well-to-wake GHG emissions of marine fuels as addressed in the life cycle analysis (LCA) guidelines developed by the Organization with the overall objective of reducing GHG emissions within the boundaries of the energy system of international shipping and preventing a shift of emissions to other sectors.

Although it was recognised that shipping would still retain its central position in Caribbean trade, participants' concern about shifting emissions to other sectors such as energy, is an important consideration for the implementation of the Strategy. The well-to-wake LCA guidelines is designed to ensure that the entire process—from fuel production to consumption—is considered when evaluating the environmental impact of marine fuels. If adopted, this holistic means of assessment will tackle the unintended consequence of transferring emissions elsewhere rather than reducing them in keeping with the ambitions set by the Strategy for maritime emissions.

## 4.8. Alternative Fuels

Participants demonstrated awareness of emerging zero or net-zero and emissions reduction technologies, such as electric cell ferries operating in Norway and Japan's onboard $CO_2$ capture testing. The potential for applying electric cell technologies to improve Carbon Intensity Indicator (CII) ratings in short-sea shipping was also considered.

Discussions also ensued in relation to the incentive of attracting cruise ships for longer stays with access to alternative fuels through bunkering and green shore power. This was seen as a means of supporting emission reduction goals and creating economic opportunities for Caribbean ports as the potential to earn carbon credits added a financial incentive for both cruise lines and port authorities.

While there was optimism about technological advancements, participants expressed concerns about SIDS' ability to access global knowledge bases, secure financing for implementation, and develop viable supply chains. It was noted that the transition to cleaner fuels could pose short-term challenges for individual countries due to high costs and complex logistics.

The discussion also addressed the interrelationship between biofuels and agriculture, referencing Brazil's experiences with ethanol and biodiesel. Participants noted that

food security could be impacted depending on whether agricultural products are prioritized for consumption or fuel production. It is to be noted that ISWG-GHG 18 has retained the outcomes of a February 2025 workshop on food security as a topic for consideration.

Capacity to handle alternative fuels is an important area, linked to the imperative of port modernization. It was noted that the adoption of alternative fuels onboard vessels would necessitate enhanced training for ports of call, due to differing procedures for handling, storage, and utilization. For example, the government-owned cargo port in Saint Vincent and the Grenadines does not currently import or distribute fuels, highlighting the need for investment in storage capacity for transitional and alternative fuels.

This highlights the need for countries to make long-range coordinated decisions through maritime transportation policies, national development strategies and allocations under climate change adaptation projects for maritime infrastructure development. Overall, participants emphasized the importance of inclusive discussions among national stakeholders to ensure fair and effective decision-making moving forward.

CSL's assessments regarding Caribbean countries' access to, and the availability, costs and environmental impacts of alternative fuels and associated infrastructure, have identified that significant investment in infrastructure and financing from international agencies will be required. Study findings are that provisions for just transition should be extensively leveraged to secure concessions, funding and support for infrastructure, research and development, capacity building.

This is intrinsically linked to deliberations about 'in' and 'out of sector' application of revenue, since ports are not considered as 'in sector' in nature. This is still being negotiated at the ISWG-GHG level with various proposals e.g. The Bahamas, Liberia and ICS (ISWG-GHG 16/2/3 25 January 2024) proposing that revenue only be disbursed for in-sector purposes such as:

a. capacity-building in developing countries, especially SIDS and LDCs;
b. deployment of zero or near-zero fuel production/bunkering infrastructure;
c. Funding for the IMO GHG-TC Trust Fund
d. applied R&D of alternative fuels and innovative technologies; and
e. seafarer training in developing countries - just transition.

Further elaboration on the viability of this proposal and others is contained in the Legal Guide for Caribbean on the IMO Greenhouse Gas (GHG) Strategy.

## 4.9. Port Modernization

Physical infrastructure, particularly in ports, will play a critical role in the pace of implementing the mid-term measures under the Strategy. Participants noted that progress toward green port modernization is mixed, and the pace of infrastructure upgrades may not align with the adoption of the mid-term measures. Key challenges include land scarcity and high population density near ports, especially those with multi-use functions. These factors necessitate collaboration with national planning authorities to develop strategic land-use solutions.

Jamaica holds a strategic advantage due to its central location in the Caribbean Sea, near the Panama Canal and major ports of North, South, and Central America. Kingston Harbour, the world's seventh-largest natural harbour, sits at the intersection of two major intermodal trade routes, and Kingston Port is one of Jamaica's five operational cargo ports. These attributes bolster Jamaica's success in containerized cargo transshipment and cruise shipping. (Stewart, 2022). Jamaica is a major logistics and transshipment centre and moves more cargo than any other Caribbean country. Trinidad and Tobago's Ports serve as sub-regional ports, with the remaining ports categorized as service ports. The number of vessels arriving per week to Antigua and Barbuda, Belize, Dominica, Grenada, Saint Kitts and Nevis and Saint Vincent and the Grenadines ports are fewer than 10 vessels without considering passenger cruise ships. (González 2020).

Islands with multi-use ferry, cruise, and cargo ports may face greater difficulties in expanding and modernizing compared to those with available land. There are, however, early movers in the region, for example, Saint Vincent and the Grenadines is developing a new cargo port complex separate from its ferry and cruise port, guided by a Master Plan for Port Development. This plan includes relocating the existing ferry terminal and upgrading the cruise ship terminal. Similarly, Antigua and Barbuda's port modernization efforts which commenced two years ago are ongoing.

Business opportunities, such as expanding port acreage, establishing a microgrid, and utilizing excess energy onshore, were identified as areas for further exploration. Initiatives under consideration include port & maritime infrastructure resilience, decarbonization financing, and a holistic public private partnership framework involving public sector leadership, private sector innovation and community inclusion.

Participants discussed potential regional impacts in the context of port modernization, noting that shippers, cruise, and commercial vessels might prefer more compliant ports, potentially disadvantaging neighbouring, less compliant ones. To address this,

participants recommended that regional policymakers explore measures to balance potential business losses and ensure equitable opportunities for all ports in the region.

## 4.10. Policy and Legal Framework

Ensuring alignment between national policy instruments, legislative frameworks, and the Strategy is critical. Policy coherence is needed across cross-cutting national strategies, including port sector decarbonization, National Maritime Transportation Strategies (NMTPs), Nationally Determined Contributions (NDCs), and National Adaptation Plans (NAPs).

Participants noted that some national strategies already reflect this alignment. For example, the draft NMTPs in Antigua and Barbuda and Saint Vincent and the Grenadines include goals for energy-efficient maritime transport systems free from GHG emissions. Antigua and Barbuda has also commissioned a Port Decarbonization Business Plan, which is under review by its Maritime Administration. Additionally, Saint Vincent and the Grenadines has integrated energy transition into its National Economic and Social Development Plan through 2025.

To support the Strategy, sectoral policies, such as those related to energy distribution and consumption, sustainable development, environmental pollution prevention, and climate change should align with broader decarbonization goals. Participants emphasized the need for an inclusive approach that engages all sectors including maritime, and which incorporates diverse energy solutions such as fuel cell technology, wave energy, and advanced storage and transmission systems. They also highlighted the need for a dedicated champion or advocate to lead these efforts.

Currently, GHG reduction in shipping is not widely included in Caribbean SIDS' NDCs. Antigua and Barbuda, for example, remains heavily dependent on fossil fuel imports, with the energy sector accounting for 76% of total $CO_2$ emissions in 2015. However, references to transportation in its Updated Nationally Determined Contribution (NDC) for the period 2020 – 2030 do not include maritime transportation.

Similarly, Saint Vincent and the Grenadines' 2016 NDC compared all sectors and emission sources and focused on key measures in the energy sector including energy generation, efficiency and transport, but excluded international aviation and shipping. However, during the discussions, participants noted progress in this regard as there are plans to incorporate GHG reduction in shipping into NDC Implementation Plans for Saint Vincent and the Grenadines and Jamaica respectively.

Participants identified the necessity for domestic legislation to be reviewed and updated to be compliant with the Strategy, for example, revising power transmission legislation to permit shore power generation, green fuel handling and storage. It was

also important to promulgate legislative amendments among operators in a timely manner as they became applicable.

## 4.11. Institutions and Bodies

Discussions highlighted the intersection of climate change and the maritime sector, particularly in the implementation of out-of-sector mechanisms. GHG and environmental focal points contributed insights and expressed readiness to collaborate on project identification and preparation in Jamaica and Saint Vincent and the Grenadines. Notably, the Centre of Excellence on the Blue Economy (COBE) at The University of the West Indies in Antigua and Barbuda emerged as a potential partner for advancing regional research and development initiatives on maritime decarbonization. This complements work being done in this area by MTCC- Caribbean and CSL experts.

Participants demonstrated a willingness to explore collective regional approaches to address climate and maritime challenges. However, to move from intention to action, relevant institutions, policymakers, and sector stakeholders must take proactive steps to bridge existing silos in the delivery of coordinated cross-sectoral efforts.

## 4.12. Just and Equitable Transition: Ensuring access to support for SIDS and LDCs

Participants expressed strong support for ensuring that Caribbean SIDS receive adequate support to achieve a just and equitable transition under the Strategy. They emphasized the need for a dedicated carve-out for SIDS in revenue arrangements, advocating for the principles of equity and fairness to guarantee a fair share of revenue distribution.

In keeping with the principle of leaving no one behind, there should be finance flows to allow for workforce reskilling, maritime education and safety training; access to innovation and opportunities; technology transfer and capacity building. The specifics of this remain to be negotiated.

Participants' enthusiasm for potential project opportunities was tempered by uncertainty surrounding the timeframe for revenue distribution and ongoing negotiations over the definitions of 'in-sector' and 'out-of-sector' uses. Additionally, questions arose about whether funding applications would be evaluated on a state-by-state or regional basis, and if success for one state could translate into shared benefits for other countries in the region.

Participants recommended that funds from the GHG levy should be allocated to key initiatives, including port modernization, enhanced bunkering capacity for transition fuels, developing onshore power infrastructure, and providing training for seafarers to operate new technologies. These investments would help SIDS and Least Developed Countries (LDCs) build capacity and resilience in alignment with the GHG Strategy, which references a just and equitable transition.

## 4.13. Regional Approaches – a role for governments and regional organizations

Participants emphasized the importance of addressing the anticipated increase in transportation costs at a regional level, given that most shipping lines serving Caribbean ports operate regionally. Cruise itineraries are inherently regional, and commercial carriers such as Tropical Shipping, Seaborne, King Ocean, and CMA CGM do not treat Caribbean islands as individual markets. Instead, markets are grouped into broader 'trades,' meaning that a policy decision by one state to invest in port modernization and expansion may not yield the expected benefits. While separating cruise and cargo ports could allow ships to dock without delays, there is currently no credit given for quicker turnaround times when ships move on to less congested destinations.

Pinnock and Ajagunna's (2012) nine policy recommendations for Caribbean maritime transportation reform include: an integrated approach to large strategic decisions; harmonizing maritime transport industry legislation; undertaking collective economic, social and environmental impact studies and acknowledging that regional organizations should provide services to member governments.

Participants felt that prudent management could enhance a country's product offering without increasing expense. Some process improvement measures were not directly aimed at climate change, however, would make sound economic sense and have indirect climate change benefits.

Process improvement measures such as the Maritime Single Window being implemented among Caribbean SIDS should continue to be a Caricom / OECS endeavour with legislative changes to allow for a Central Repository to collect the requisite electronic Advance Passenger and Advance Cargo forms. This could contribute to GHG emissions reduction by improving vessel transit times with less time emitting in port.

Regionalism remained a central theme in the discussions. Participants recognised that Caribbean SIDs represent a small market, and that the challenges implicit in the mid-term measures could best be met as a regional unit.

# 5. Conclusions and Recommendations

Focus group discussions with stakeholders highlighted several dimensions regarding mechanisms for reducing GHG emissions in maritime transportation. Interests varied in the four participating countries, based on factors such as geography and economies of scale.

CSL's modelling results demonstrated the region's heterogeneity, as seen in trade volumes, for example Saint Lucia imports ten times more than it exports, while Jamaica imports four times more than it exports.

Discussions in the Southern islands (Saint Vincent and the Grenadines and Saint Lucia) focused on the implications of short sea shipping, the cruise/cargo port dynamic, and the trickle-down impacts on livelihoods.

Participants in the Northern islands, (Jamaica and Antigua and Barbuda), being less impacted by short sea shipping and less reliant on a single carrier, saw opportunities for port modernization and bunkering of alternative fuels to capitalize on new technologies.

The costs of implementing the IMO GHG Strategy may compound existing charges and reduce profit margins for businesses driven by profit imperatives. Some attention is being given to process improvements that could alleviate the impact of the levy, particularly ahead of any potential injection of revenue. Regional approaches to trade facilitation in the maritime transportation sector should be considered where feasible.

Countries with international registries, such as Antigua and Barbuda, Saint Vincent and the Grenadines, and Jamaica, may have vessels that are already compliant under other regimes due to the licensing processes conducted in their U.S. and European offices. This group of countries continue to have regard to the impacts of the mid-term measures on ships that fly their flag.

Achieving policy coherence will require a strong centre-of-government focus to coordinate national policies and strategies and enact necessary legislative revisions and amendments.

The region's vulnerability to the effects of climate change were consistently identified by participants. As such, identifying strategies to mitigate disproportionate negative impacts is a critical next step.

A key takeaway from the focus group discussions was the importance of including the right stakeholders at the table, including government, the private sector, and other key stakeholders to discuss the potential impacts and ways of lessening the impact of the mid-term measures. Participants expressed support for broader national-level discussions, continued dialogue and research, and ensuring that SIDS voices remain active in international negotiations.

While participants trusted their maritime authorities to act in the national interest, disparities in preparedness and readiness to articulate positions were noted. GHG focal points and ambassadors will play a critical role by staying informed, facilitating communication between national and international spheres, and advocating for the region's interests.

The Caribbean Shipping Lanes (CSL) Project’s convening power was evident, and participants welcomed the discussions, acknowledging that shipping is not typically a priority topic. The project has demonstrated not only the attributes of a conventional project but also the momentum of a broader movement, advocating for the region’s maritime interests and driving a unified approach to international negotiations.

# 6. Policy Recommendations

1) **Continued evaluation of carbon pricing and other mechanisms as the negotiations evolve:** CSL's analysis of the pros and cons of a universal levy, and counter proposals such as flexibility compliance mechanisms, SIDS exemptions, or phased implementation of carbon pricing can aid in national assessments. Building on these analyses can inform decision-making, the conduct of gap/needs assessments, accelerating country readiness to implement mid-term measures and consolidating progress toward the Strategy's ambitious targets.

2) **Ensure Equitable Revenue Disbursement:** A clearer regional position is needed on fair and equitable revenue distribution from carbon pricing mechanisms. Caribbean States need to establish transparent mechanisms for fund distribution, while negotiating for direct, timely, and predictable access to the GHG Strategy Implementation Fund to be administered by the IMO. Caribbean SIDS must continue to advocate for technical and financial support in upgrading trade infrastructure to ensure the maritime sector's smooth transition.

3) **Engage High-Level Policymakers and Private Sector Stakeholders:** Finance, trade, and climate ministries should be engaged alongside regional industry bodies to align public and private sector strategies with the GHG Strategy. In most cases, the focus group discussions were the first step in wider stakeholder engagement on emissions reduction in international shipping at the national level.

4) **Enhanced Regional Coordination and Negotiation Capacity:** Findings from focus groups emphasize the need for strong regional coordination. A unified Caribbean voice is essential for securing equitable maritime outcomes. Enhancing negotiating capacity will allow regional representatives to effectively articulate collective national positions. Negotiating teams must continue to adopt a unified Caribbean position with support from the Caribbean Community (CARICOM) and the Organisation of Eastern Caribbean States (OECS).

5) **Strengthen Alliances through Expanded South-South Cooperation:** Caribbean States need to consolidate alliances with South-South cooperation groupings and articulate well-reasoned positions supported by solid data. Strengthening partnerships with South-South alliances, including the Pacific and African groupings, will enhance the Caribbean's influence in ongoing IMO negotiations. Negotiations at ISWG-GHG 18 benefited from African, Caribbean and Pacific voices being heard.

6) **Data-Driven Advocacy:** National authorities should validate the qualitative data gathered through the focus group discussions, using on-the-ground statistics to present a compelling case for mitigating negative impacts on Caribbean SIDS.

7) **Prioritize Port Modernization and Logistics Reform:** Upgrading infrastructure, through port modernization for alternative fuels such as green hydrogen, ammonia, and biofuels, can help offset cost increases and improve the efficiency of maritime trade in the region. Addressing existing supply chain inefficiencies, retrofitting ports to accommodate new fuelling technologies, developing projects for revenue disbursement to facilitate investment in bunkering infrastructure are critical steps to prepare for the transition to low-carbon shipping while maintaining trade competitiveness. Seeking appropriate financing and developing innovative strategies to achieve these outcomes is needed.

8) **Reinforce Regional Food Security Frameworks:** Recommendations from CSL's assessments can inform policy decision making and mitigate potential disruptions from the levy. Building on initiatives such as the CARICOM 25 by 25 Initiative to reduce reliance on food imports can mitigate food security impacts on livelihoods and welfare.

**Image 1: Group photos from various Focus Group Discussions**

# Appendix 1

FOCUS GROUP DISCUSSION QUESTIONS

**Question One – Perceptions about the Universal Levy**

1. What do you think about the IMO's GHG Strategy's measure of imposing a universal levy on ships to reduce emissions?

**Question Two – Perceptions about the Universal Levy**

2. Do you think imposing a universal levy on global shipping emissions can accelerate the transition to greener maritime practices in (Country x)? Please explain.

**Question Three – Operational and Economic Impacts**

3. What do you think will be the biggest challenges in implementing a universal levy on ship emissions?

    3.1 Do you foresee any opportunities in this regard? Please explain.

**Question Four – the Universal Levy and Energy transition**

4. Do you believe the levy will effectively incentivize shipping companies and fuel suppliers to adopt low-emission technologies?

**Question Five - Commodities and food security sensitivity**

5. What are the key commodities that (Country x) imports and exports? How might a universal levy impact costs in relation to these commodities in terms of:

    5.1 The costs of importing these goods (freight costs)
    Impacts on small businesses and local distributors
    Impacts on prices in local markets and stores

**Question Six**

6. What are typical transport costs paid on imports as a proportion of goods value: for example, on a supermarket shelf, if a large pack of rice costs $20, how much of that price is derived from transportation?

    6.1 How does this vary *across* important common commodity types, especially 'essential goods'? i.e. food vs fuels, construction materials?

**Question Seven - Global Fuel Standard (Operational and Economic Impacts)**

7. Do you think (Country x) stands to benefit from the adoption of the proposed technical measure (a global goal – based fuel standard) by 2030 or 2040? Please explain.

    7.1 Do you see the combination of a levy with the global fuel standard as feasible options for SIDS such as (Country x)? Please explain.

**Question Eight**

8. What transitions and measures are needed to facilitate zero or net-zero GHG maritime fuel utilisation in (Country x)'s maritime and related sectors?

    8.1 What opportunities and challenges exist regarding refining and distribution of alternative fuels?

**Question Nine - Cruise Ship Industry Sensitivity**

9. How might compliance with the global fuel standard affect cruise ship operations such as routing, scheduling, or port visits?

    9.1 Do you foresee challenges for (Country x) as cruise ship operators adapt to new fuel standards and/or the levy?

    9.2 Do you consider that changes in fuel costs and emissions levies may influence the pricing of cruise vacations for consumers?

    9.3 What impact if any, do you think this will have on (Country x)'s tourism product?

**Question Ten - Just and Equitable Transition and Revenue Distribution**

10. The Strategy commits to promoting a just and equitable transition. What do you think this could look like for (Country x)?

    10.1 Do you think funds generated by adoption of a global fuel standard together with a levy should be utilised *within* the international maritime transportation sector or *in* and *out* of the sector for achieving wider climate change and ocean health goals in SIDS?

**Question Eleven**

11. How can the IMO ensure transparency and fairness in the collection and use of funds from the levy?

    11.1 What do you think the criteria for distribution of such funds should be?

    11.2 Do you think there should be a dedicated allocation for Small Island Developing States (SIDS) within the revenue arrangements?

**Question Twelve**

12. What specific projects or initiatives do you think should be prioritized for implementation with this revenue in (Country x)?

12.1 What criteria, if any should be included for such projects or initiatives?

12.2 Are there initiatives between the maritime and environment sectors in (Country x) that are useful for utilising the revenue and supporting climate change adaptation?

# Appendix 2

Stakeholder Agencies

**Antigua and Barbuda**
Attorney General's Chambers
Chamber of Commerce
Climate Change Ambassador
Department of Environment
Department of Fisheries
Department of Statistics
Ministry of Agriculture, Land, Fisheries and the Blue Economy
Ministry of Finance & Corporate Governance
Port Authority
Sailing and Yachting Committee
West Indies Oil Company
Focal Point: Antigua and Barbuda Department of Marine Services and Merchant Shipping (ADOMS)

**Jamaica**
Jamaica Manufacturers and Exporters Association
Kingston Freeport Terminal Limited
Kingston Wharves Limited
Ministry of Agriculture, Fisheries and Mining
Ministry of Economic Growth and Job Creation
Ministry Science, Energy, Telecommunications and Transport
Petrojam Limited
Planning Institute of Jamaica
Port Authority of Jamaica
Private Sector Organization of Jamaica
Shipping Association of Jamaica
Focal Point: Maritime Authority of Jamaica

**Saint Lucia**
Attorney General's Chambers
Cruise Port
Defence Force
Freight Broker
Investment Agency
Ministry of Commerce
Ministry of Health
Police Force

Shipping Agent
Solid Waste Management
Focal Point: Saint Lucia Air and Seaports Authority

**Saint Vincent and the Grenadines**
Attorney General's Chambers
Coast Guard
Customs and Shipping Agents
Ferry Services
Fisheries Division
Forestry Department
National Emergency Management Organisation
Port Authority
Sustainable Development Unit
Focal Point: Saint Vincent and the Grenadines Maritime Administration

# Glossary

| | |
|---|---|
| Carbon Intensity Index (CII) | A short-term measure under the IMO GHG Strategy that links GHG emissions to transport work |
| Flexibility Compliance Mechanism (FCM) | A proposed mechanism which would grant Flexible Compliance Units (FCUs) to ships that exceed the requirements |
| GHG Fuel Intensity (GFI) | The amount of greenhouse gas emissions produced per unit of energy used by a fuel which reduces gradually to minimize the impacts of the fuel transition on States |
| Greenhouse (GHG) gases | Gases covered by the LCA Guidelines namely carbon dioxide ($CO_2$), methane ($CH_4$) and nitrous oxide ($N_2O$) |
| LCA Guidelines | Guidelines issued by the IMO covering well-to-tank, tank-to-wake and well-to-wake emissions of all possible marine fuels and energy carriers |
| Transport work | The amount of cargo carried over distance travelled |

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## About Caribbean Shipping Lanes

The Caribbean Shipping Lanes (CSL) Project, housed at the Shridath Ramphal Centre, supports the Caribbean's engagement in International Maritime Organization GHG negotiations. With funding from the United Nations Foundation and support from the University College London and the Belize Port Authority, CSL enhances regional coordination, research, and advocacy for sustainable and climate-resilient maritime policies.

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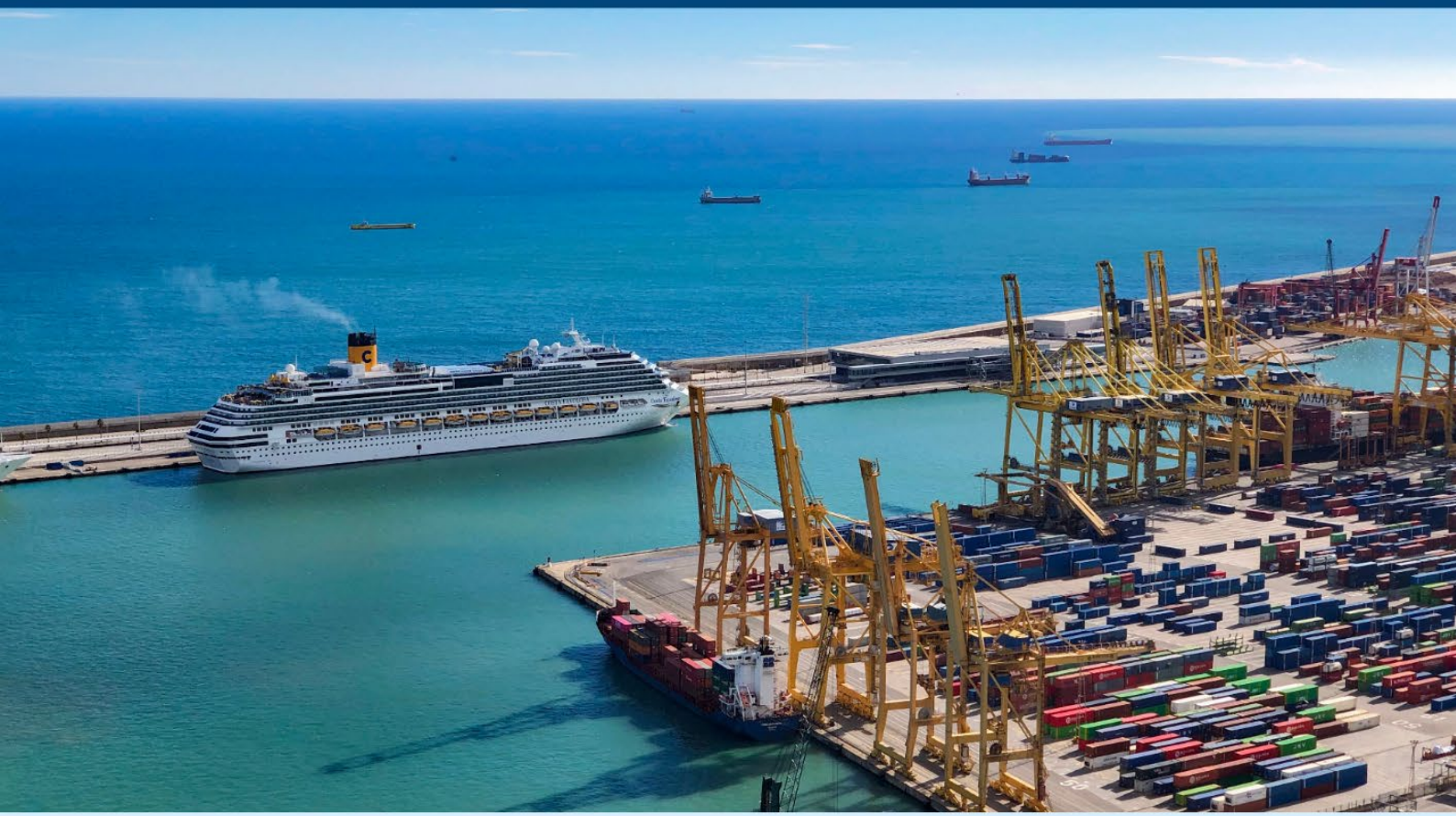

CARIBBEAN SHIPPING LANES