

Summary ECSCA position

FuelEU Maritime

ECSCA welcomes

- Increased climate ambition
- Objective to foster uptake of cleaner fuels
- Flexibility to meet fuel targets
- Well-to-wake approach
- Multiplier for shipping in RED

ECSCA concerned about

- Substantial enforcement loopholes undermining environmental objectives
- Verification relying on paper documents
- Lack of consistency with other proposals (RED and RefuelEU Aviation) by making ships and not fuel suppliers subject to fuel standards
- Unnecessary administrative burden (new MRV and double reporting)
- Penalising ships for lack of Onshore Power Supply

ECSCA recommends

- Consistency with RED and ReFuelEU Aviation
- Shared responsibility between EU fuel suppliers & shipping companies to meet FuelEU targets
- EU fuel suppliers responsible for fuel availability and compliance with quality and safety requirements
- Shipping companies purchase cleaner fuels available in EU ports
- Fostering demand by bridging the price gap between cleaner and conventional fuels:
 - Sector-specific fund & investment of EU ETS revenues in energy transition
 - Use of carbon contracts for difference under EU ETS innovation fund
 - Introduction of multiplier of 4 for cleaner fuels in FuelEU
- OPS exemption if infrastructure is not available
- Additional port infrastructure requirements for more fuel types such as hydrogen and ammonia
- Special conditions applying to ice classed vessels