
From:

Sent: Wednesday, October 03, 2012 5:43 PM

To: ENV AIR

Cc:

Subject: Report on shipping emissions - Europa comments

Dear Madam,

Dear Sir,

EUROPIA and CONCAWE welcome the report from VITO on emissions from shipping that will form the basis to study the possible establishment of new emission control areas in European Seas. We have reviewed the report and considered the 6 questions suggested by the Commission's Air Quality team. EUROPIA and CONCAWE would like to offer the following comments:

- With respect to questions 1, 2 and 3, the report appears to provide a solid shipping emissions inventory split over the different European sea areas. The overall methodology used is consistent with earlier work completed by Entec for CONCAWE and referenced in the report. At this moment we have not been able to complete a detailed review of current and projected emission inventories versus this earlier work and we may be able to offer some more detailed comments later on. From our first review, we observe that the sustained growth assumptions for shipping out to 2050 may be too optimistic, which would lead to an overestimate of future emissions. We also observe that the effects from the current focus on energy efficiency in shipping (adoption of the Energy Efficiency Design Index (EEDI) and Ship Energy Efficiency Management Plans (SEEMP) by IMO) have not been factored into the projection. To complete further review, it would be useful to gain access to the data underpinning the VITO report at a more detailed level, including the gridded data that has been submitted to EMEP and IIASA for their further work.
- Concerning question 4, we are concerned that the soot particle filters considered in some scenarios are at this moment only an emerging technology, for which actual performance and actual installation and operating costs need to be demonstrated in practice on board large ships before such data can be used as a basis for a potential regulatory initiative.
- With respect to questions 5 and 6, we can only emphasize the importance of adequate sensitivity analysis, in particular where it concerns long term projections. Future deployment of scrubbing technology is one such case. We would also recommend to include consideration of the climate impact of the different scenarios, including effects of increased energy use and GHG emissions in the refining sector where different fuels are involved and the effects of short lived climate forcers.

We hope that these comments will be taken into consideration as the work is progressed and we are looking forward to make further contributions to the debates.

Yours sincerely,

*Executive Officer,
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