NOTE TO THE FILE

ECSA Board Meeting

30 June 2022

Participants COM: R. Lesovici (CAB VAlean), (DG MOVE)

Context: we were invited to present the Fitfor55 package to the ECSA Board meeting.

Main points discussed in the meeting:

- Shared responsibility with fuel suppliers in FuelEU: Commission took the opportunity to
 highlight the relevant elements that would deem impracticable a proposal for shared
 responsibility with Fuel Suppliers. RED was highlighted as the key instrument that should
 contain all relevant requirements on Fuel Producers/ Suppliers. Topic was more marked by
 Union of Greek Shipowners. Responsibility of fuel suppliers to be defined in a context of fuel
 supply contracts between operators.
- Fuel Non-Availability Report (FONAR): Highlighted by ECSA as a cornerstone of the shipowners proposal – FONAR was reiterated by ECSA as an essential possibility for operators to justify non-availability of compliant fuel. The demonstration of compliance with FuelEU is however based on the average GHG intensity of the energy used onboard, not allowing to determine what would be "non-compliant" fuel.
- Fuel Availability: ECSA expressed concerns. Commission used the opportunity to underline the relevance of the work just started by the Renewable and Low-Carbon Fuels Alliance.
- Fuel Certification: Some shipowners raised concerns regarding the quality of fuels, especially if/when purchased outside the EU. Further questions raised regarding the reassurance of quality of blended fuel products.
- Scope of Emissions for FuelEU vis-à-vis ETS: discussed the scope of emissions both in FuelEU maritime and ETS, with shipowners raising concerns regarding the Well-to-Wake VS Direct Stack Emissions, respectively, of both approaches. Commission highlighted the development of Delegated Acts in ETS which will consider differentiation based on biogenic/renewable synthetic origin of carbon-based fuels.

Roxana Lesovici