CPMR ANSWER
To the EC targeted consultation on FuelEU Maritime Initiative

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The European Green Deal Communication emphasised the need to accelerate the transition to a low-emission and climate-neutral economy, including through the shift to sustainable mobility.

In this context, the 2020 Commission Work Programme announced a legislative initiative entitled "FuelEU Maritime - Green European Maritime Space". This initiative is designed as an important element of the upcoming “Strategy for a Sustainable and Smart Mobility”. It will aim at ramping-up the production, deployment and uptake of sustainable alternative marine fuels. It will also contribute to address the European Green Deal’s ambition of regulating access of the most polluting ships to EU ports and obliging docked ships to drastically reduce their emissions, including through using shore-side electricity.

In this context, the Commission has opened a public consultation to gather the views of citizens and stakeholders on this initiative.

The Conference of Peripheral Maritime Region (CPMR) welcomes the initiative. It echoes the messages adopted in its policy position of October 2019 on “Climate Neutral Transport for All”. Therefore, the CPMR believes that this FuelEU Maritime Initiative should:

- Contribute to reach climate neutral transport by 2050 at the latest,
- Take into account the sensitive situation of Europe’s peripheries,
- Consider the diversity of European Regions and territories,
- Ensure that Europe’s support is up to the task
- Clarify what is “clean”
- Encourage international convergence
Ensuring that maritime transport contributes to climate neutrality

In Europe, the maritime transport sector has taken important steps towards reducing significantly its carbon footprint over the last few years. It is important that the EU takes specific initiatives, within the framework of the Green Deal, to ensure and support the sector so that it can fully contribute to our common objectives. The CPMR therefore welcomes the FuelEU Maritime Initiative that should cover maritime traffic as well as port activities.

Taking into account Europe’s Peripheries

Maritime transport is a vital mode for many peripheral maritime regions. Especially for Islands and Outermost-Regions, as it is one of the two sole modes to connect them with the mainland. Maritime transport is actually their main or only transport mode for goods. Specific attention should therefore be given to those Regions in the context of the initiative. Unfortunately, past experiences have proven that important legislations aiming to reduce the impact of maritime transport could have a negative impact on regional accessibility, especially for islands. For example, the entry into force of the 0.50% sulfur limit in the Mediterranean on 1 January 2020, although it contributes to enhance the air quality, induced a significant increase of travelling costs between Mediterranean islands and the continent that put at risk their socio-economic balance. In that respect, carrying sound ex-ante analysis on socio-economic impact would open the door to considering the possibility of establishing new SECA in Europe.

In order to avoid this kind of negative side effect, the design of the FuelEu Maritime Initiative should include a sound ex-ante impact analysis with a focus on its potential socio-economic impact on peripheral maritime Regions, especially for islands and outermost Regions. The initiative should include tailor-made tools and measures to support its implementation in those Regions such as those provided for in article 107 of the Treaty of the Functioning of the European Union, at least for the first years of its entry into force.

Taking into account the diversity of European Territories

Europe is diverse, so are its Regions and its ports. For instance, access to clean fuels and renewable energy varies in the EU, not all ports have the same storage ability for clean fuels which can hamper their capacity to provide sustainable alternative to traditional fuels. This diversity makes ineffective a one-size fits all approach. It demands a goal-based and territorial approach instead of a too prescriptive one. The FuelEU maritime initiative must adapt to local and regional realities to facilitate its implementation and limit the adaptation challenges for the ports, maritime companies and maritime Regions.

Ensuring that EU’s support is up to the task

Electrification as well as ramping-up the production, decarbonisation of port activities, deployment and uptake of sustainable alternative marine fuels would demand major investment throughout the EU. A strong MFF is a necessary condition for success. Considering
the cuts CEF 2.0 has suffered, the CPMR share its doubts as to its ability to provide the necessary support to the European maritime transport sector to adapt to new requirements, especially, in the context of the COVID-19 crisis that has already severely impacted its economic stability.

The launch of this new initiative could be the opportunity to further develop alternative support measures for maritime transport. In that respect, the deployment of eco-incentives could prove to be an interesting option. The experience of the MedAtlantic Eco-Bonus could for instance be replicated in each Sea-Basin.

**Clarifying what is “clean”**

The FuelEU Maritime Initiative must clarify what “sustainable alternative marine fuels” is. The Directive on the deployment of alternative fuels infrastructure (94/2014) sets already a list. The initiative has to establish whether or not this list is its basis to identify clean fuels.

In parallel, the Initiative should valorise existing European innovative projects that are being developed in our Regions, including projects that offer alternative propulsion solutions to fuels. These projects, such as Neoline for instance, have grown thanks to the joint efforts of dynamic regional innovation ecosystems that should be encouraged. EU tools are key for successfully supporting innovation front-runners, universities, Regional and local authorities for them to innovate and work together.

**Encouraging international convergence**

Fighting climate change must be an international commitment, the EU will not achieve major successes alone. As the FuelEU Maritime Initiative aims to tackle this challenge, it is worth recalling that maritime transport is, in essence, a global sector. It means that our maritime transport sector faces an international competition. It also means that there could be several different standards in European sea-basins. The initiative must therefore include an international dimension that would focus on the efforts that the EU must undertake to influence the International Maritime Organisation and its work with European third Countries. It will demand strong commitments and clear successes to lead by example.
countries across Europe and beyond. Organised in Geographical Commissions, the CPMR works to ensure that a balanced territorial development is at the heart of the European Union and its policies.

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