



ECSA

European Community Shipowners' Associations

DIRECTIVE 2012/27/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 25 October 2012 ON ENERGY EFFICIENCY

Implementation of energy audits and energy management systems in the maritime sector

ECSA POSITION PAPER

ECSA acknowledges the need to collect information about energy consumption from international shipping and from a broader perspective can see value in a common framework of measures for the promotion of energy efficiency within the EU as aimed at with the Energy Efficiency Directive 2012/27/EU. ECSA is however concerned with the implementation at EU Member States level of Article 8 on energy audits and energy management systems of the Directive creating additional and unnecessary administrative burdens and costs for European shipping companies, as it is essentially a duplication of some of the existing industry efforts without leading additional benefit for the shipping industry.

In this respect, we would like to highlight with the present document the existing European and international requirements on maritime transport fulfilling the energy management systems as required under the Energy Efficiency Directive.

Firstly, the International Maritime Organisation (IMO) adopted mandatory technical and operational measures in July 2011, in particular the Energy Efficiency Design Index (EEDI) for new ships and the Ship Energy Efficiency Management Plan (SEEMP) for existing vessels, which will mitigate the expected increase in GHG emissions. By implementing the EEDI and the SEEMP, the IMO has applied the first ever application of global measures for a specific industry.

Secondly, the EU Regulation on monitoring, reporting and verification of carbon dioxide emissions from maritime (MRV Regulation), entering into force on 01 July 2015, will require shipping companies to submit to verifiers a ship CO₂ emissions monitoring plan and methodology for approval and reporting of their emissions. The EU MRV Regulation should be considered as a contribution towards finding an appropriate global solution for CO₂ monitoring from international shipping to be decided in the IMO.

In particular, SEEMP is a management tool for ship operators to establish a mechanism to improve a ship's operational and energy efficiency in a cost-effective manner. Effectively, the SEEMP plan includes objectives, monitoring, measurements, goals and evaluation accomplishing the purpose of the Energy Efficiency Directive to identify

energy savings opportunities on ships. It recommends therefore the use of the IMO Energy Efficiency Operational Indicator (EEOI), currently a voluntary monitoring tool to measure and improve the fuel efficiency of a ship in operation.

In addition, the ISO standard 14001 - containing procedures for selecting the best measures for a particular vessel and then setting objectives for the measurement of relevant parameters, along with relevant control and feedback features - has dominated the shipping industry. Its 2015 update will provide companies with a more integrated process and will strengthen their commitment to sustainable development and resource use, climate change and environmental protection.

In the implementation process by EU Member States, some discrepancies have been observed on how to deal with maritime transport. The envisaged or already in place national systems vary, from new auditing schemes (like ESOS in the UK¹) disregarding or going beyond common practices already in use in the maritime sector, to straightforward approaches using the references to existing international SEEMP and ISO 14001 standards.

ECSA advocates the avoidance of unnecessary administrative burden and duplication with the implementation of the EU MRV system and existing SEEMP requirements. Therefore, ECSA urges EU Member States to accept that using SEEMP and ISO 14001 standards should be sufficient to comply with the Energy Efficiency Directive auditing requirements and consequently exempt shipping from taking any additional measures.

Brussels, 10 March 2015

The European Community Shipowners' Associations (ECSA), formed in 1965, comprises the national shipowners' associations of the EU and Norway. ECSA aims at promoting the interests of European shipping so that industry can best serve European and international trade and commerce in a competitive and free business environment, to the benefit of both shippers and consumers. The European Economic Area maintains its very prominent position with a controlled fleet of 40% of the global commercial fleet.

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¹ The Energy Savings Opportunity Scheme (ESOS) was established in the UK to implement Article 8 on Energy audits and energy management systems under the EU Energy Efficiency Directive.