

# ECSCA position on FuelEU Maritime

## ECSCA is 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 welcomes

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

## ECSCA recommends

- Robust enforcement by making EU fuel suppliers responsible for fuel standards
- Fostering demand by bridging the price gap between cleaner and conventional fuels through:
  - ✓ Sector-specific fund & investment of ETS revenues in energy transition
  - ✓ For instance the use of carbon contracts for difference under innovation fund
  - ✓ Higher multiplier in RED
- Integrate the necessary information into the existing EU MRV Regulation
- OPS exemption if infrastructure is not available