



Malta's written comments on Block C of the Proposal for a Regulation of the European Parliament and of the Council on the use of renewable and low-carbon fuels in maritime transport and amending Directive 2009/16/EC

Following its intervention during the Shipping Working Party on 28 January 2022, Malta would like to submit its written comments, in particular with respect to the several possible approaches for strengthening the supervision of verification activities (Part II), as listed in the Presidency's non-paper (WK 935/2022):

Detailed comments:

- **PART II**

Approach 1 – Malta would like to place a scrutiny reservation.

Approach 2 – Malta is not convinced of the need to strengthen the system of verification.

Approach 3 – In principle Malta can support that the verification system be regulated by ROs in terms of the same provisions of Regulation (EC) No 765/2008. In the shipping sector, ROs are more familiar with how this industry operates.

Approach 4 – Whilst Malta understands the need for the independence of the verifier, we do not necessarily see the need for having a different RO, from the RO that classes the ship.

Approach 5, 6 and 7 – Malta has concerns that these additional provisions to strengthen the verification process could make the process excessively cumbersome and increase administrative burden.

Approach 8 – Malta does not see the necessity for this provision. Any support from EMSA should already be possible in terms of the current of mandate of EMSA, and there is no need to include such provisions in this legislation.

Approach 9 – The proposals are seen in a positive light; however, this needs further consideration.

Approach 10 – Malta can agree in principle.

Further reactions in relation to MS' comments on Block C:

Article 14

Malta fully supports BE's comments on Article 14. It is pertinent that all proposals in the package for shipping are aligned. Placing clearly the obligation on the old company to submit the data to the new company in the case of change of company across all the



Proposals is considered the best solution as in this way the new company will not be held accountable for circumstances beyond its control.





Council of the European Union
General Secretariat

Brussels, 15 February 2022

WK 2178/2022 INIT

LIMITE

TRANS
MAR
ENV
ENER

IND
COMPET
ECO
RECH
CODEC

This is a paper intended for a specific community of recipients. Handling and further distribution are under the sole responsibility of community members.

WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Shipping
N° Cion doc.:	ST 10327/21 ADD 1-3
Subject:	Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the use of renewable and low-carbon fuels in maritime transport and amending Directive 2009/16/EC - Comments from Member States - Malta

Delegations will find attached comments from Malta on the above subject.