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## **WORKING DOCUMENT**

From:	General Secretariat of the Council
To:	Working Party on Shipping
N° Cion doc.:	10327/21 INIT + 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 the Member States - the Netherlands

Delegations will find, attached, comments from the **Netherlands** on the above mentioned subject.



## NL answers to the questions concerning FuelEU Maritime

**The Netherlands welcomes the discussion on the scope and ambitions of FuelEU Maritime, as included in the non-paper of 11 March and we'd like to provide in written input the answers (in line with the input in the Shipping Working Group of 18 March).**

### Questions

*1.a - Pouvez-vous accepter la proposition de la Commission concernant le périmètre géographique pris en compte (100% des émissions pour les trajets intra-UE et dans les ports de l'UE, et 50% des émissions pour les trajets extra-UE)?*

The Netherlands welcomes the Commission proposal regarding the geographic scope and the percentages for respectively intra- and extra-EU voyages and doesn't see a reason to raise the percentage of extra-EU.

*1.b Souhaitez-vous modifier le seuil de taille des navires (jauge brute supérieure à 5000) couverts par les obligations du règlement ?*

The Netherlands emphasizes the importance of have a consistent scope with EU-ETS and MRV. The Netherlands sees the merits in an extension of the scope, with the inclusion of ships between 400 and 5000gt. We see several reasons for this inclusion: This segment of the fleet has a significant share in (the emissions of) intra-EU operations; there are renewable energy carriers (with lower energy density) which are suitable for operating on these short distances and in smaller ships; it avoids a different treatment of ships <5000gt and >5000gt; inclusion of this segment can trigger the increased use of renewable energy (and – in combination with ETS – incentivise the investment in them).

It is important to do this in close consideration with the revision of EU-ETS and MRV and potentially allowing a longer period of implementation for this segment. In the link with AFIR, in a possible extension, we see the merits of making an exception for this segment (between 400 and 5000gt) in an obligation to use on-shore power supply (in article 5).

*2.a Pouvez-vous accepter la proposition de la Commission concernant les cibles d'intensité carbone proposées à l'article 4 ? Seriez-vous ouverts à certaines des évolutions suggérées par des délégations mentionnées ci-dessus ?*

The Netherlands sees a potential gap between the transport targets of RED (13% reduction in 2030) and the limit (in particular in 2025 (2%) and 2030 (6%)) for GHG intensity of FuelEU. In a study performed for the Netherlands, it is concluded that this can lead to a mismatch and a possible discrepancy in fuel supply to the different modes of transport, especially for countries with a higher share of maritime fuel supply. We see the merits of increasing the ambition of FuelEU in 2025 and 2030, also to avoid the risk of technology/fuel lock-in and to stimulate the uptake of renewable fuels. Given the availability and the business case, the possibilities of a higher ambition (e.g. 9% in 2030) should be assessed.

*2.b Pouvez-vous accepter la proposition de la Commission concernant la prise en compte des carburants? Seriez-vous ouverts au traitement différencié de certaines classes de carburants, et si oui selon quelles modalités ?*

The Netherlands supports the Commission proposal to align the sustainability and GHG saving criteria with those of RED. Concerning the use of RFNBOs and RCFs, the default values in Annex II should be closely examined (also depending on the GHG emission calculations in the forthcoming delegated act for RED), taking into account their carbon sources.