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## WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Shipping
N° Cion doc.:	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 - Italy

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

# Italy comments on the FuelEU Maritime Regulation

## wk03260.fr22

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Italy wishes to thank the Presidency for the compromise text in document WK 3260.fr.22, very useful for the debate. Please find below our comments and suggestions on the questions of Part II.

### Question n°1)

Use of IPCC AR 6 values or refer to the Directive (EU) 2018/2001:

Due to the close connection between the FuelEU proposal and the RED directive, Italy prefers the use of the Directive (EU) 2018/2001.

### Question n°2)

*BDN:*

Italy prefers option 1, as the creation of a new model could imply further administrative burden; the alignment to the international scene is also important.

### Question n°3)

Liquid biofuel pathway:

Italy prefers option 2 because, for the WtT emissions, where the type of raw materials is fundamental, a reference is made to the RED II directive for the various categories of biofuel, while the TtW emissions is only for the type of finished fuel.

### Question n°4)

Rely on JEC study numerical values, as proposed, or make reference to the upcoming delegated act:

Italy prefers the reference to the delegated act already in the text, with the aim of giving a lasting reference. In this regard, Italy would like to point out that is necessary to adopt the related delegated act that has been expected for years.

### Question n°5)

Italy prefers to amend the EEDI/EEXI Guidelines to define PWind and PTot in order to globally harmonize such definition.