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SECRETARÍA GENERAL DE TRANSPORTES Y MOVILIDAD

DIVISIÓN DE ESTUDIOS Y TECNOLOGÍA DEL TRANSPORTE

## PROPOSAL FOR A REGULATION FOR THE DEPLOYMENT OF INFRASTRUCTURES FOR THE SUPPLY OF ALTERNATIVE ENERGY FOR TRANSPORT

## (09/05/22) Comments by Spain on the FR Presidency proposal of 6 May 2022

Ref.	Text & proposals for amendment	Comments on recitals & annexes
Recital (7)	Liquefied methane is likely to play a continued role in maritime transport, where there is currently no economically viable zero-emission powertrain technology available. The Communication on the Smart and Sustainable Mobility Strategy points to zero-emission seagoing ships becoming market ready by 2030. Fleet conversion should take place gradually due to the long lifetime of the ships. Contrary to maritime transport, for inland waterways, with normally smaller vessels and shorter distances, zero-emission powertrain technologies, such as hydrogen and electricity, should enter the markets more quickly. Therefore, liquefied methane is expected to no longer play a significant role in inland waterway transport. Transport fuels such as liquefied methane need increasingly to be decarbonised by blending/substituting with liquefied biomethane or renewable and low-carbon synthetic gaseous e-fuels (e-gas) for instance. Those decarbonised fuels can be used in the same infrastructure as gaseous fossil fuels thereby allowing for a gradual shift towards decarbonised fuels.	Liquified methane Including further references —definition (29a) of article 2—, general call for coherence within the European legal framework. In this case, both Regulation on the internal markets for renewable and natural gases and for hydrogen, and Renewable Energy Directive, currently under discussion. Inland waterway transport Clarification.
Recital (32)	Shore-side electricity facilities can serve maritime and inland waterway transport as clean power supply and contribute to reducing the environmental impact of seagoing ships and inland waterway vessels, while at port. Under the FuelEU maritime initiative, ship operators of container and passenger ships need to comply with provisions to reduce emissions at berth. Mandatory deployment targets should ensure that the sector finds sufficient shore-side electricity supply for ships that are moored at the quayside in TEN-T core and comprehensive maritime ports to comply with those requirements.	Clarification.

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New recital (34d)	As the main goal of shore side electricity supply is to reduce emissions at port and considering the technical and operational complexities to convert alternate into direct current, such conversion for battery recharging systems as part of the potential electrical demands of seagoing vessels should be responsibility of the vessel.	Linked to clarification of recital (32).
Annex II 4.3.	Technical specifications for shore-side battery electricity recharging points for maritime vessels, featuring interconnectivity and system interoperability for maritime vessels.	In line with the comment to the definition (58) of Article 2, where we object to obligations to supply electricity in direct current, these technical specifications should refer exclusively to alternating current.
Annex II 4.5.	Technical specifications for vessel-to-port grid communication interface in automated shore-side electricity supply and battery recharging systems for maritime vessels.	

Ref.	Text & proposals for amendment	Other comments on articles
2. (3) (b)	'renewable fuels': means renewable fuels as defined in Article 2, point (22a) of Directive (EU) 2018/2001,	General call for coherence within the European legal framework. There should not be different definitions for the same concept.
2. (58)	'shore-side electricity supply' means the provision of shore-side electrical power at alternate current through a standardised interface to seagoing ships or inland waterway vessels, moored at the quayside;	Linked to clarification of recital (32) and new recital (34d), and there must be full consistency between this dossier and that of FuelEU Maritime. Furthermore, it is unfeasible to make it compulsory to supply in direct current because of the implications this has on the design of the infrastructure and supply equipment. It should be the ships that have the current rectifiers to convert alternating current to direct current. The aim should be to power the ship's electrical systems while in port, which operate on alternating current. If the ship wants to recharge its batteries, it can request the necessary power, but not require a DC supply
9.1. (c)	TEN-T core and TEN-T comprehensive maritime ports, for which the average annual number of port calls of ships that are moored at the quayside over the last three years by seagoing passenger ships above 5000 gross tonnes other than seagoing ro-ro passenger ships and seagoing high-speed passenger craft is above [50], are equipped to provide each year shore-side electricity supply for at least [90%] of the total number of port calls of seagoing passenger ships above 5000 gross tonnes other than seagoing ro-ro passenger ships and seagoing high- speed passenger craft that are moored at the quayside at the maritime port concerned.	<ul><li>25 calls implies having to guarantee supply 1 call per 2 weeks. This requisite is excessive and may not be justified from the point of view of the economic profitability of the investment necessary to guarantee this supply, particularly for ships with high energy demand while in port.</li><li>50 calls, 1 per week, would not condition the social and economic profitability of the investment.</li></ul>

Ref.	Text & proposals for amendment	Other comments on articles
11.1.	Member States shall ensure that an appropriate number of refuelling points for liquefied methane are put in place at TEN-T core maritime ports referred to in paragraph 2, to enable seagoing ships to circulate throughout the TEN-T core network by 1 January 2030. Member States shall cooperate with neighbouring Member States where necessary to ensure adequate coverage of the TEN-T core network.	While there has been significant deployment of the gas bunkering market in the last 5 years, there are still some developments to come, particularly in the ultra- peripheral regions (Canary Islands), where the profitability of investments is adjusted, and the developments delayed. As liquified methane supply includes biogas and synthetic LNG, this extension should not be seen as a truce to fossil fuels.
12 2.	As of 1 January 2030 at the latest, Member States shall take the necessary measures to ensure that the electricity supplied pursuant to paragraph 1 comes from the electricity grid or is generated on site without using fossil fuels.	It is necessary to review this paragraph because it is not a practical proposal. The Government would have to set up very detailed and exhaustive authorisation procedures, which would cause delays, lead to increased bureaucracy, and require carrying out periodic on-site inspections.



Council of the European Union General Secretariat

Brussels, 11 May 2022

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## WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Transport - Intermodal Questions and Networks
N° prev. doc.:	ST 7592/22 REV4
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Subject:	<ul> <li>Fit for 55 Package - AFIR: Proposal for a Regulation on the deployment of alternative fuels infrastructure, and repealing Directive 2014/94/EU</li> <li>Further revised Presidency compromise</li> <li>Comments from Spain</li> </ul>

Delegations will find in the annex, comments from Spain on the subject mentioned above.