

## EUROMOT POSITION

### FUEL EU MARITIME

8 November 2021

---

#### General comments

**EUROMOT welcomes the FuelEU Maritime proposal from the European Commission as a tool to overcome the barriers for the uptake of low and zero carbon fuels in shipping.** EUROMOT members are committed to advancing the development of engine technology and propulsion systems capable of operating on such fuels.

As the ship's energy efficiency is not considered in this proposal, it remains important to keep the focus on increasing the energy efficiency of ships by additional efforts. Further, EUROMOT would like to underline that the availability of low and zero carbon fuels is a necessary prerequisite for achieving the intended effect of the proposal.

#### Well-to-wake approach

In the view of EUROMOT, a well-to-wake approach is crucial for low and zero carbon fuels in order to provide a clear legal framework and to ensure global net reduction of GHG. Verification of well-to-tank emissions should be performed according to acknowledged international standards, be transparent regarding assumptions and sources and be based on verified documentation of feedstock and pathways. **EUROMOT therefore fully supports the well-to-wake approach proposed in FuelEU Maritime.**

#### Pooling mechanism

EUROMOT sees a need for incentivizing first movers to drive the uptake of engines and propulsion systems capable of operating on low and zero carbon fuels. Against this background, **EUROMOT supports the possibility for pooling of compliance for fleets** as one potential measure for that purpose. It is the assessment of EUROMOT that the pooling mechanism would make (net)zero fueled ships more competitive in a short-term perspective.

### **Energy from electricity**

EUROMOT supports initiatives to incentivize the uptake of low/zero carbon fuels in a goal-based and technology neutral way. In the view of EUROMOT, the proposal in Annex I to set the well-to-tank GHG intensity of electricity to zero cannot be considered as technology neutral and could lead to an increase in GHG intensity if the electricity used has a higher WtT GHG intensity compared to the fuel actually used on board. **Thus, we propose to include the GHG intensity of electricity in the calculation of the annual average well-to-wake GHG intensity by deleting the corresponding sentence on page 2 of Annex I.** In this context we note that Annex I already contains a necessary default factor for electricity (for the case of an EU electricity mix).

### **Tank-to-wake emission factors**

EUROMOT supports the possibility to use actual values for tank-to-wake emission factors based on a certification scheme as proposed in article 9.3. This option, however, should be applicable for all fuels, including fossil fuels. The possibility to use actual values instead of the default values for all fuels will incentivize the efforts to reduce non-CO<sub>2</sub> GHG emissions in the tank-to-wake perspective. Hence, **EUROMOT supports the option to use actual values for TtW emission factors for all fuels, including fossil fuels.**

### **Zero emission technologies**

EUROMOT notes that the list of zero emission technologies in Annex III allows for fuel cells “*powered by renewable and low carbon fuels*”. In our understanding, this means that fuel cells in ports could be powered by fuels that are not net zero GHG (e.g. LNG or methanol).

In the view of EUROMOT, this approach is not in line with the well to wake consideration in the proposal and the current definition of the zero emission (zero CO<sub>2</sub>), and, furthermore, is not technology neutral.

EUROMOT acknowledges the definition of zero emission as to have also zero emissions of air pollutants. As the focus in this proposal is on reducing GHG emissions, EUROMOT would **propose to consider a “near zero” approach regarding pollutant emissions**, allowing for the use of engines in port running on (net) zero carbon fuels and with emission reduction technology reducing emissions to “near zero levels” (to be defined), using e.g. filters, SCR catalyst.

### **Procedures for measurement and certification of tank-to-wake emissions**

EUROMOT notes that the procedures for measurement and certification of tank-to-wake emission factors will be developed in a committee procedure.

This is a highly technical issue, and **EUROMOT therefore encourages to engage industry experts in the development of such procedures, for example through the ESSF.** EUROMOT members have experience with emission measurements and are ready to contribute to the work on TtW emission factors and measurement procedures.

---

EUROMOT – 2021-11-08

#### **For more information please contact:**

EUROMOT aisbl - European Association of Internal Combustion Engine Manufacturers  
Rue Joseph Stevens 7, 1000 Brussels, Belgium  
Dr Peter Scherm – General Manager  
Phone: +32 (0) 289321-41  
Email: peter.scherm@euromot.eu  
www.euromot.eu



EUROMOT aisbl · Rue Joseph Stevens 7 · 1000 Brussels · Belgium

A European Interest Representative · TVA BE 0599.830.578 · RPM Brussels  
EU Transparency Register Id. No. 6284937371-73

A Non-Governmental Organisation in consultative status with the UN Economic Commission for Europe (UNECE) and the UN International Maritime Organisation (IMO)

PRESIDENT

Dr Holger Lochmann

GENERAL MANAGER

Dr Peter Scherm

**EUROMOT** is the European Association of Internal Combustion Engine Manufacturers. It is committed to promoting the central role of the IC engine in modern society, reflects the importance of advanced technologies to sustain economic growth without endangering the global environment and communicates the assets of IC engine power to regulators worldwide. For more than 25 years we have been supporting our members - the leading manufacturers of internal combustion engines in Europe, USA and Japan - by providing expertise and up-to-date information and by campaigning on their behalf for internationally aligned legislation. Taken together, the EUROMOT member companies employ about 200,000 highly skilled and motivated workers. The European market turnover for the business represented exceeds 25 bn euros.

**OUR MEMBERS**



[www.euromot.eu](http://www.euromot.eu)



EUROMOT aisbl · Rue Joseph Stevens 7 · 1000 Brussels · Belgium  
 A European Interest Representative · TVA BE 0599.830.578 · RPM Brussels  
 EU Transparency Register Id. No. 6284937371-73  
 A Non-Governmental Organisation in consultative status with the UN Economic Commission for Europe (UNECE) and the UN International Maritime Organisation (IMO)

**PRESIDENT**  
 Dr Holger Lochmann  
**GENERAL MANAGER**  
 Dr Peter Scherm