



**EUROMOT**

The European Association of Internal  
Combustion Engine and Alternative  
Powertrain Manufacturers



**POSITION PAPER**

**Comments and Review of  
Maritime Technical Screening  
Criteria under the EU Taxonomy  
Climate Delegated Act**

**22 August 2025**

The logo for EUROMOT, featuring the word "EUROMOT" in white, bold, uppercase letters on a dark green rectangular background.

The European Association of Internal  
Combustion Engine and Alternative  
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## **EUROMOT POSITION**

# **COMMENTS AND REVIEW OF MARITIME TECHNICAL SCREENING CRITERIA UNDER THE EU TAXONOMY CLIMATE DELEGATED ACT**

**22.08.2025**

### **Executive Summary**

- The current maritime Technical Screening Criteria (TSC) under the EU Taxonomy Climate Delegated Act are not fit for purpose, primarily due to their lack of technology neutrality.
- The criteria rely on zero tailpipe CO<sub>2</sub> emissions and design-based efficiency metrics (e.g., EEDI/EEXI), which are not applicable to all vessel types.
- We recommend a shift to a well-to-wake emissions assessment, aligned with IMO methodologies, to better reflect actual climate impact.
- Updates to the Delegated Regulation (EU) 2021/2139 are needed to incorporate recent technological and legislative developments, including FuelEU Maritime and the revised EU ETS.
- Criteria should be made more usable and verifiable through clear thresholds, standardized documentation, and simplified compliance pathways.

### **Introduction**

As active members of the European Sustainable Shipping Forum (ESSF), we welcome the opportunity to contribute to the work stream on ship finance. Our objective is to support the improvement of the EU Taxonomy criteria for maritime transport, ensuring they are fit for purpose, technology-neutral, and aligned with the sector's decarbonization pathways. This paper outlines our position on the current maritime-related Technical Screening Criteria (TSC) and proposes concrete recommendations for their revision.



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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)

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## Are Current Maritime TSC Fit for Purpose?

We believe the current maritime TSC, particularly those under Sections 3.3, 6.10, 6.11, and 6.12 of the Climate Delegated Act (Regulation (EU) 2021/2139), are not fit for purpose. The primary reason is the lack of technology neutrality in the criteria, which currently emphasize zero tailpipe CO<sub>2</sub> emissions as the main eligibility condition.

This approach:

- Disadvantages vessels using renewable fuels (e.g., biofuels, e-methanol, ammonia) that do not achieve zero tailpipe emissions but offer significant lifecycle GHG reductions.
- Combines fuel use with additional efficiency metrics (e.g., EEDI/EEXI), which are not applicable across all vessel types, particularly retrofitted or specialized ships.
- Fails to reflect the full climate impact of maritime operations, which should be assessed on a well-to-wake basis.

## What Concrete Changes Are Needed?

We propose the following changes to improve the TSC:

- **Adopt a well-to-wake GHG emissions approach** to assess climate performance, in line with the IMO's lifecycle assessment methodology.
- **Remove mandatory coupling with EEDI/EEXI** or other design-based efficiency metrics that are not universally applicable.
- **Allow for multiple compliance pathways**, including:
  - Use of renewable and low-carbon fuels with certified GHG savings.
  - Retrofitting measures that demonstrably reduce lifecycle emissions.
  - Operational improvements and digital solutions that enhance energy efficiency.

## Are Updates Needed for Technological or Legislative Changes?

Yes. The Climate Delegated Act (Regulation (EU) 2021/2139) must be updated to reflect:

- **Technological advancements** in alternative fuels, propulsion systems, and retrofitting solutions.
- **New EU legislation**, such as FuelEU Maritime and the revised EU ETS for shipping, which introduce lifecycle-based emissions accounting and fuel GHG intensity thresholds.
- **Market developments**, including the emergence of green shipping corridors and voluntary carbon intensity standards.

These updates are essential to ensure alignment between the EU Taxonomy and the broader EU regulatory framework for maritime decarbonization.

## How Can Criteria Be Made More Usable and Verifiable?

To enhance usability and verifiability, we recommend:

- **Clear, measurable thresholds** for well-to-wake GHG emissions, harmonized with FuelEU Maritime.
- **Standardized documentation and certification** for fuel sustainability and emissions performance (e.g., through recognized third-party schemes).
- **Simplified compliance pathways** for smaller operators and retrofitted vessels, avoiding excessive administrative burden.
- **Digital tools and templates** to support reporting and verification, integrated with existing EU MRV and IMO DCS systems.

## Conclusion

We urge the European Commission to revise the maritime TSC to ensure they are inclusive, technology-neutral, and aligned with real-world decarbonization efforts. A well-to-wake, performance-based approach will better reflect the diversity of sustainable solutions in the maritime sector and support the EU's climate goals.

We remain committed to contributing constructively to the work stream and look forward to further dialogue.

## **THIS IS EUROMOT**

EUROMOT, the European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers, represents the key manufacturers of internal combustion engines and alternative powertrains installed in industrial non-road mobile machinery, marine and stationary applications that are operating in Europe and worldwide.

Founded in 1991, we provide an unparalleled heritage and hub of expertise for businesses, authorities, regulators, and public stakeholders worldwide. In partnership with major sector associations and institutions, it is our mission to drive smart regulation and sustainable innovation.

Delivering dependable power for society at high energy conversion efficiency with low emissions remains a key objective of EUROMOT member companies. EUROMOT asserts internal combustion engines and alternative powertrains are a key enabler to address the additional societal need for decarbonisation across multiple industry sectors. This can be achieved by continuing to advance the development of highly efficient energy conversion systems capable of operating on low and net-zero Greenhouse Gas (GHG) energy carriers.

Headquartered in Brussels, EUROMOT is a European interest group, and our profile is registered in the EU Transparency Register under the identification number 6284937371-73. We have been granted consultative status at the United Nations IMO (International Maritime Organization, London) and United Nations ECE (Economic Commission for Europe - Geneva) and other relevant stakeholders.

EUROMOT member products are extremely complex, internal combustion engines typically have between 1200 to over 2000 components and (electric) motors have more than 200 parts. The scale of the number of components gives an insight into the high complexity of these devices. Moreover, EUROMOT members' products are highly integrated complete systems for power supply. These need to be adapted to the respective application or end use to fulfil the required work task, for example the quality of the operating fuels and the operating conditions (temperature, humidity, harsh chemical environment).

## **OUR MEMBERS**



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



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