



EUROMOT

The European Association of Internal
Combustion Engine and Alternative
Powertrain Manufacturers

POSITION PAPER

Comments on Marine Power
Systems and the Sustainable
Transport Investment Plan
(STIP)

2 September 2025

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

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COMMENTS ON MARINE POWER SYSTEMS AND THE SUSTAINABLE TRANSPORT INVESTMENT PLAN (STIP)

02 September 2025

Executive Summary

EUROMOT welcomes the European Commission’s Sustainable Transport Investment Plan (STIP) and its ambition to accelerate the decarbonisation or preferably de-fossilization of transport. Marine power systems, ranging from inland waterway vessels to oceangoing ships and recreational craft, play a vital role in European mobility, trade, and industrial resilience. This position paper outlines the sector’s specific needs and offers recommendations to ensure STIP supports a technology-neutral, lifecycle-based, and globally aligned approach to marine decarbonisation.

Key requests:

1. Supports Technology Neutrality

- Avoid prescribing specific technologies.
- There exist no “single silver bullet solution” due to the diverse composition of the sector of many different ship types, power demands, voyage patterns, and last but not least different span of lifetime and ownership of vessels.
- Enable innovation across internal combustion engines (ICEs), hybrids, fuel cells, and electric systems.
- Use Life Cycle Analysis (LCA) and Well-to-Wake (WtW) metrics to assess climate impact, supporting GHG reduction technology innovation.

2. Invest in Marine Infrastructure

- Develop bunkering infrastructure for low-carbon and renewable fuels.
- Expand charging infrastructure for electric vessels.
- Tailor infrastructure to vessel type, operational profile, and geography.



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EU Transparency Register Id. No. 6284937371-73

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PRESIDENT

Dr Holger Lochmann

GENERAL MANAGER

Dr Peter Scherm

3. Ensure Fuel Availability

- Prioritise access to drop-in fuels (e.g. HVO, e-fuels, biomethane, and e-LNG) and renewable fuels such as e-methanol and e-ammonia.
- Support competitive pricing and secure supply chains for sustainable fuels.
- Remove the barrier of the so called “additionality” criteria for renewable hydrogen production to enable faster ramp-up and supply of renewable Hydrogen and e-fuel production.

4. Enable Retrofit and Transition Pathways

- Facilitate use of low-carbon fuels in existing fleets.
- Provide transition periods and incentives for gradual adoption.

5. Recognise the Needs of End Users

- Ensure the path to decarbonisation enables the retention of the capability of the applications in which the internal combustion engines and alternative powertrains are installed.
- Ensure resilience of fundamental supply chains.

6. Align with Global Maritime Frameworks

- Review and alignment of FuelEU and ETS to ensure coherence with IMO regulations.
- Promote European leadership in marine decarbonisation technologies.

Marine Sector Overview

Marine applications are diverse, encompassing:

- Inland waterway transport: flexible, and essential for regional logistics.
- Seagoing vessels: high energy demand, long voyages, and global regulatory alignment.
- Recreational craft: long lifespans, low annual usage, and fragmented ownership.

Marine power systems must deliver dependable, resilient, efficient, and adaptable energy across varied operational profiles. EUROMOT members provide technologies that support these needs while advancing decarbonisation through fuel flexibility, hybridisation, and energy efficiency.

Key Challenges faced

- Infrastructure gaps: Lack of bunkering and charging facilities for renewable and drop-in fuels.
- Fuel availability: Limited access to renewable and drop-in fuels at competitive prices. End-users across the industries served by EUROMOT members generally need to compete for business. They may be reluctant to purchase new high-value products for which availability of the required energy carrier is uncertain or the price is uncompetitive.
- Lifecycle emissions: Need for Life Cycle Analysis (LCA), enabling GHG reduction technology innovation, to assess true climate impact.
- Technology diversity: No single solution fits all vessel types or use cases.



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- Global alignment: IMO and EU regulatory coherence is essential for competitiveness.

Recommendations for STIP

1. Support Fuel Diversity and Lifecycle-Based Decarbonisation

- Promote drop-in low carbon and renewable fuels (e.g. HVO, e-fuels, biomethane, e-LNG, e-methanol and e-ammonia).
- Many in-use products are already capable of operation on certain alternative energy carriers with little or no modification. Ensuring such energy carriers are available and making it attractive for existing end-users to switch to them has the potential to rapidly accelerate decarbonisation.
- Recognise the role of internal combustion engines (ICEs) operating on drop-in and renewable fuels.
- Use Life Cycle Analysis (LCA) and Well-to-Wake (WtW) metrics in policy design, which supports GHG reduction technology innovation.

2. Invest in Marine Infrastructure

- Develop bunkering stations for renewable fuels and shore-power and charging infrastructure for electric and hybrid vessels.
- Tailor infrastructure to vessel type, operational pattern, and geographic context.

3. Enable Retrofit

- Support retrofit solutions for existing fleets to use low-carbon fuels.

4. Ensure Technology Neutrality

- Avoid prescriptive mandates; allow industry to innovate across ICEs, hybrids, fuel cells, and electric systems.
- Evaluate technologies based on operational efficiency, safety, and feasibility.

5. Recognise the needs of End Users

- Ensure the path to decarbonisation enables the retention of the capability of the applications and resilience in which the internal combustion engines and alternative powertrains are installed. The continued ability to deliver dependable power to perform the intended task wherever it is needed is critical to ensure end-user acceptance to replace existing products.

6. Align with Global Maritime Frameworks

- Coordinate with IMO regulations, FuelEU Maritime, and ETS to ensure consistency.
- Support European leadership in marine technology and fuel innovation.

Conclusion

Marine power systems are essential to Europe's transport and industrial ecosystem. EUROMOT urges the Commission to ensure STIP reflects the complexity and diversity of marine applications, supports fuel and infrastructure deployment, and enables a balanced, inclusive, and future-proof decarbonisation strategy.



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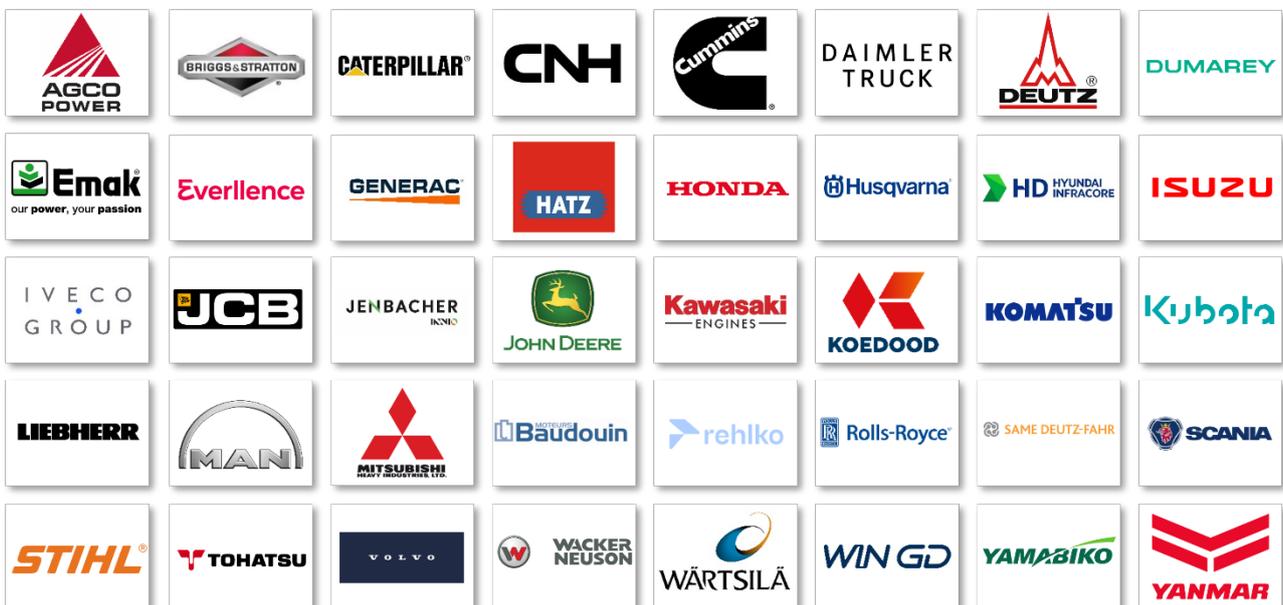
EUROMOT, the European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers, represents the key manufacturers of internal combustion engines and alternative powertrains installed in industrial non-road mobile machinery, marine and stationary applications that are operating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

OUR MEMBERS



www.euromot.eu



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Contact Us

EUROMOT aisbl

The European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers

Aliénor Poher
Senior Manager Regulatory Affairs
and Sustainability



+32 (0) 28 93 21 42



Rue Joseph Stevens 7
1000 Brussels - Belgium



alienor.poher@euromot.eu



www.euromot.eu

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RPM Brussels

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