

# SHIP FINANCING

## **ECSA GENERAL FEEDBACK - PUBLIC CONSULTATION ON THE REVISED CLIMATE, ENERGY AND ENVIRONMENTAL AID GUIDELINES (CEEAG)**

**ECSA would like to contribute to the European Commission's work on the review of the CEEAG.**

**ECSA welcomes the broadening of the scope of the Guidelines in support of clean and transitional technologies. However, ECSA is of the view that the current definition of 'clean transport vehicle' is not fit for purpose and blocks transitional initiatives that reduce greenhouse gas emissions significantly.**

**ECSA believes that supporting the transitioning of the entire shipping and maritime industry is key to reach the EU Green Goals. Definition of clean and environmentally efficient projects should be fit for purpose. To assist in setting such a definition, ECSA provides a list of guiding principles that should be taken into account.**

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### **The European shipping industry is dedicated to be at the heart of the green future**

The shipping industry is committed to becoming climate neutral as soon as possible. Alternative ship propulsion technologies, such as wind-assisted propulsion, and low carbon or fossil free fuels available worldwide (for example

methanol, ammonia and hydrogen) and collaboration with partners in the maritime and logistics supply and value chain are the key to ultimately reach full decarbonisation. European shipowners cooperate with the shipbuilding sector, ports, equipment manufacturers and the research community in order to reach and implement as soon as possible even more innovative and sustainable solutions, which will drive the entire maritime industry towards a truly sustainable future, including in key areas such as air and GHG emissions, waste management, and do no harm to marine life. The European shipping industry embraces these challenges and is committed to taking the global lead for clean shipping.

Additionally, it is highlighted that in an unprecedented move, the international shipping community has recently announced plans to create the first collaborative shipping R&D fund, the International Maritime Research Fund, intended to eliminate CO2 emissions from international shipping. The proposal includes core funding for R&D activities necessary to develop innovative and sustainable solutions of USD 5 billion over a 10-year period.

### **The EU shipping industry's role in global competitiveness is a strategic asset of the EU and of the EU Green Deal**

76% of the EU's external trade is shipped by sea and 40% of the world fleet is controlled by European shipowners. Shipping is at the very heart of global trade as 90% of all goods are transported by sea. The European shipping industry is a success story with global presence and a geostrategic asset for the EU.

With its diverse fleet of container ships, tankers, passenger ships, bulk carriers,

offshore service vessels and many other specialised ships, the EU shipping industry contributes a total of EUR 149 billion to the EU's annual GDP. The shipping sector contributes to strategic goals such as transport of essential goods, development and maintenance of offshore renewable energy, safe ports and coastal protection.

**Supporting transition of the shipping sector towards a green future is key in order to reach the EU Green Deal ambitions whilst at the same time safeguarding the competitiveness of the EU Shipping Industry**

Given the fact that clean technologies and fuels are not yet (fully) proven and competitively applicable at a large scale at this point in time, transition is key<sup>1</sup>. Continuous efforts focus on lowering emissions, however, these efforts are capital intensive. In order to transition the entire shipping industry, available and affordable funding is necessary such as subsidies for R&D, upscaling and long term finance. In this regard, ECSA considers it vital that conditions defined to provide environmental aid ensure that transition measures towards a green economy are acknowledged and accepted and, hence, the aid given will encourage and support the industry's initiatives towards sustainability.

**The current definition of 'clean transport vehicle' is not fit for purpose**

ECSA strongly opposes the narrow definition of "clean transport vehicle" for

sea and coastal vessels (Point 2.4 (20) e and f of the draft CEEAG). This approach is inadequate for the sector for the following reasons:

- The definition is based on the definition of green economic activities under the Climate Delegated Act of the Taxonomy Regulation. This definition was developed for an entirely different purpose. In addition, this definition, being based on the Taxonomy Technical Screening Criteria, does not address transition. The European Commission themselves state that "*the EU Taxonomy does not currently define how activities other than green are to be treated. It does not define or categorize any activities as 'improving the current levels of environmental performance' but not reaching the level of substantial contribution*"<sup>2</sup>. Additionally, the Taxonomy definition has not yet been put in practice, there is no evidence of its impact and usability;
- The definition fails to recognise the specificities of the waterborne transport sector and the diversity of the shipping industry. A "one-size-fits-all approach" is counterproductive at both levels. The power levels needed and trade distances sailed differ per type of vessel: a tugboat cannot be compared with an offshore vessel and that cannot be compared with a deep sea bulk vessel.
- This definition will block the scale-up of potential sustainable and promising solutions in maritime transport such as use of renewable and low carbon fuels (e.g. climate neutral e-fuels) which will

<sup>1</sup> Even the European regulator recognises that transitional activities have a value in the greening process, for example in Regulation EU 852/2020 Article 10 point 2

<sup>2</sup> European Commission Communication, COM (188) 21.04.2021. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021DC0188&from=EN>

provide a significant decrease of GHG emissions during the transition.

In this light, ECSA is of the view that the Commission should follow a technology neutral approach and fit the conditions and definitions for purpose. This is essential to avoid disincentivising (innovative) clean technologies and to stimulate a rapid development of environmentally efficient solutions for waterborne transport.

In this light, ECSA strongly supports that for the CEEAG conditions, which recognise the parameters of the transition, are set and would welcome the inclusion of the specific characteristics of the shipping industry when defining these parameters. This could include, but is certainly not limited to the following characteristics:

- The shipping industry is characterised by a diversity of ship types representing different proportions of the world fleet: containers, bulk carriers, tankers, passenger ships, (offshore) service vessels. This diversity implies diversity in characteristics and technical solutions which should be taken into account;
- The shipping industry is characterised by a diversity of operations of its fleet : tramp shipping - liner shipping, deep sea - short sea shipping. The particularities of these modes of maritime transport should be taken into account;
- Asset life-time is long: facilitate the development of future technologies without downgrading the ones we assessed as transition technologies today and support vessels to be retrofitted throughout their lifetime;
- For most of the goods transported by the shipping industry today, there exists no alternative: shipping is the most efficient and lowest emission transport

available and shipping has already undertaken significant steps towards decarbonisation. We acknowledge that there are more steps to take and we are ready to do so;

- Shipping has an impact on the entire supply chain, as almost 90% of the world's goods are transported by sea.

Additionally, ECSA would like to support this process by providing a set of guiding principles attached in Annex I.

**For more information, please contact:**

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