

# Including maritime transport emissions in the EU's greenhouse gas reduction commitment

General Information	
<p>Are you answering as an individual or on behalf of an organisation or institution? -single choice reply-(optional)</p>	<p>I am answering on behalf of an organisation or institution (company, NGO, public authority, ...)</p>
<p>Please select the option which is the best description of your organisation (1 choice only). -single choice reply-(optional)</p>	<p>company / professional association</p>
<p>Please enter the name of your organisation. Please briefly describe which stakeholders (or members) you represent. -open reply-(optional)</p>	
<p>BP2S - Bureau de Promotion du Shortsea Shipping SPC France - Shortsea Promotion Centre France</p>	
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<p>Please enter an email address for contact purposes (to be used in case of clarification questions only): -open reply-(optional)</p>	<p>shortsea@shortsea.fr</p>
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General context	
<p>Do you consider that the maritime sector should contribute to European emission reduction efforts as other sectors? -single choice reply-(optional)</p>	<p>No</p>

Please substantiate your answer.

-open reply-(optional)

Le transport maritime ne devrait pas être sujet à un système de réduction des émissions de CO2 en Europe car les autres modes de transports terrestres n'y sont pas soumis. Dans le cas de la création d'un système européen, le shortsea shipping souffrirait d'un déficit de compétitivité au regard des autres modes de transport. C'est par ailleurs le mode maritime qui contribue le plus efficacement à la décongestion des routes européennes. Un tel système irait à l'encontre des politiques de report modal et d'intermodalité/comodalité mises en place au sein de l'Union depuis 2001. Dans le cas de la création d'un tel système nous rappelons l'obligation et la nécessité de réaliser des études d'impact sur le shortsea shipping pour éviter toute perte de compétitivité par rapport aux autres modes de transport en concurrence directe.

Do you consider that revenues should primarily be used to support investments to reduce emissions in the maritime sector?

Yes

-single choice reply-(optional)

Do you consider that revenues should primarily be used for international climate change finance? -single choice reply-(optional)

No

Do you consider that revenues should be used for other purposes? -single choice reply-(optional)

No

Please substantiate your answer.

-open reply-(optional)

Les revenus/bénéfices devraient pouvoir contribuer au renouvellement/modernisation de la flotte. Les infrastructures portuaires devront aussi être considérées. La remotorisation/amélioration technologique est indispensable pour diminuer les rejets. Mais celle-ci ne peut être prise en charge uniquement par l'armateur : elle doit être accompagnée d'investissements portuaires simultanés.

## Definition of the scope

### Routes covered

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Do you think that **routes related to search and rescue, fire fighting or humanitarian operations authorised by the appropriate competent authority** should be excluded from the scope ?

-single choice reply-(optional)

Do you think that **routes performed exclusively for the purpose of scientific research or for the purpose of checking, testing or certifying vessels or equipment** should be excluded from the scope ?

-single choice reply-(optional)

Do you think that **routes performed in the framework of public service obligations in accordance Council Regulation (EEC) N° 3577/92 of 7 December 1992 applying the**

Yes

**principle of freedom to provide services to maritime transport within Member States (maritime cabotage)** should be excluded from the scope ?

-single choice reply-(optional)

Do you think that **routes performed from or to a Least Developed Country as defined by the United Nations** should be excluded from the scope ?

-single choice reply-(optional)

Do you consider that any other routes should be considered for exclusion ?

-single choice reply-(optional)

Please substantiate your answer.

-open reply-(optional)

Do you have any other remarks on the routes covered? **Yes**

-single choice reply-(optional)

Please substantiate your answer.

-open reply-(optional)

L'idée des politiques de report modal depuis 2001 est de favoriser le shortsea shipping en alternative et complémentarité des autres modes de transport eu Europe. Une réglementation régionale ne couvrant pas les autres modes de transport mettrait à bas cette politique. Il faut décongestionner les voies terrestres et considérer l'équation globale et les conséquences systémiques.

## Type of ships covered

Do you see reasons for excluding any particular ship category? **No**

-single choice reply-(optional)

Are there other categories than those mentioned above which should be included ? **Yes**

-single choice reply-(optional)

Please substantiate your answer.

-open reply-(optional)

La grande plaisance. Par ailleurs, ce ne sont pas les types de navires qui doivent être considérés mais plutôt les types de route/services

## Reliance on shipping

Do you consider that the reliance on shipping at a local or regional level should be taken into account? **Yes**

-single choice reply-(optional)

If yes, how should this be taken into account?

-open reply-(optional)

Les régions les plus dépendantes en transport maritime (entre autres les régions périphériques et ultra-périphériques) seront les plus

gravement touchées par une possible augmentation du prix du transport maritime. Il faut absolument conserver une égalité de traitement entre les modes routiers et maritime.

## Evasion / avoidance

Please provide us specific examples, analysis, data, etc. on this potential issue. Please note that any additional study, example, analysis, etc. can be uploaded or sent to [clima-eccp-ships@ec.europa.eu](mailto:clima-eccp-ships@ec.europa.eu) -open reply-(optional)

Risque de re-routage vers Tanger-Med

## Compensation fund

Who should manage a compensation fund? Please substantiate your answer.

-open reply-(optional)

Il est souhaitable que le fond soit géré par une instance internationale (OMI par exemple) ou mandaté au niveau international (EMSA par exemple) avec des critères identiques et une redistribution organisée suivant des modèles uniformes. Un fond de compensation a moins d'éléments spéculatifs qu'un ETS et est moins compliqué. Le fond de compensation peut être affecté à des investissements dans des navires.

Do you think that several compensation funds could be feasible? Yes

-single choice reply-(optional)

Please substantiate your answer.

-open reply-(optional)

Les fonds pourraient être divisés entre les différents types de navires pour faciliter les comparaisons entre les différents programmes d'amélioration techniques et de réduction des émissions.

### Option 1 : Contribution-based approach

Do you consider that contributions to a compensation fund should, in the initial years of a system, be limited? Yes

-single choice reply-(optional)

If you consider that contributions to a compensation fund should, in the initial years of a system, be limited, should this contribution be initially reduced by reference to contributing a percentage of a certain carbon price? No

-single choice reply-(optional)

If you consider that contributions to a compensation fund should, in the initial years of a system, be limited, should this contribution be initially reduced by pre-set levels of contribution in financial terms? Yes

-single choice reply-(optional)

In the event that revenues are needed for international climate finance, how long should a transition take to full contribution (please specify

a year)? -open reply-(optional)

## Option 2 : Target-based approach

How can compliance be ensured?

-open reply-(optional)

Do you consider that option 1 could achieve the emission reduction required effectively and efficiently? -single choice reply-(optional) Partially agree

Do you consider that option 2 could achieve the emission reduction required effectively and efficiently ? -single choice reply-(optional) Disagree

## Mandatory emission reductions per ship

Do you consider that option 1 could achieve the emission reduction required effectively and efficiently ? -single choice reply-(optional) Disagree

Do you consider that option 2 could achieve the emission reduction required effectively and efficiently? -single choice reply-(optional) Partially agree

Please substantiate your answer.

-open reply-(optional)

Do you consider that the target can be set on an other basis? -single choice reply-(optional) No

Please substantiate your answer. -open reply-(optional)

Autres bases trop complexes

Do you consider that a mechanism that rewards early movers should be explored -single choice reply-(optional) Yes

If yes, what kind of mechanism could be implemented? -open reply-(optional)

Des réductions d'impôts Un accès facilité au crédit Des subventions et/ou autres aides plus facilement obtenues.

Do you consider that a mechanism that creates incentives to go beyond the mandatory emission reduction should be explored? -single choice reply-(optional) No

# Emission trading system

Do you consider that financial support (either directly as free allowances or some of the revenue generated from allowances) should be given during a transitional period?

-single choice reply-(optional)

If yes, and in the event that revenues are needed for international climate finance, how long should a transition take?

-open reply-(optional)

Should shipping be able to acquire emission reductions from other sectors? -single choice reply-(optional)

Should shipping be able to sell emission reductions to other sectors?

-single choice reply-(optional)

Please substantiate your answers -open reply-(optional)

Do you consider that an ETS could achieve the emission reduction required effectively and efficiently?

-single choice reply-(optional)

Disagree

Please substantiate your answer -open reply-(optional)

Cela semble trop compliqué et susceptible de spéculation. Certains pourraient s'en échapper (ex : la Chine). Risque d'inégalité dans l'application.

## Tax

### Tax on fuel

Do you consider that the evasion risk can be avoided when setting a tax on bunker fuel?

-single choice reply-(optional)

Yes

If yes, what specific measures could be developed to avoid/reduce the risk of evasion? -open reply-(optional)

Do you consider that a tax on fuel could achieve the emission reduction required effectively and efficiently?

-single choice reply-(optional)

Partially agree

Please substantiate your answer.

-open reply-(optional)

Seul le shortsea shipping est piégé : la taxe sera générale et les navires shortsea ne pourront éviter à une telle taxe. Les modes terrestres (avec lesquels le shortsea doit être compétitif) ne seront pas soumis à ces règles. Il est fondamental que des études d'impact soient réalisées sur le shortsea shipping afin d'éviter de grever sa compétitivité.

## Tax on emissions

Do you consider that a tax on emissions could achieve the emission reduction required effectively and efficiently? -single choice reply-(optional)	Disagree
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Please substantiate your answer -open reply-(optional)

Elle serait beaucoup plus difficile à calculer que la taxe sur le fuel.

## Choice of policy options

Compensation fund -single choice reply-(optional)	1
Mandatory emission reduction per ship -single choice reply-(optional)	3
Emission trading system -single choice reply-(optional)	3
Tax -single choice reply-(optional)	2
Environmental effectiveness (ensure effective emission reduction in line with the 2°C objective) -single choice reply-(optional)	No opinion
Maintain the competitiveness of the EU -single choice reply-(optional)	No opinion
Maintain competitiveness of the EU maritime sectors, while giving them the first mover advantage, by providing incentives to increase fuel efficiency before the rest of the world adopt specific measures -single choice reply-(optional)	1
Enforceability (Ensure appropriate monitoring, reporting and verification while keeping administrative burden to the minimum) -single choice reply-(optional)	1
Consistency with the related EU policies -single choice reply-(optional)	1
Vulnerability: Exposure to/Risk of evasion -single choice reply-(optional)	1
Timeliness (Consistency with timing of application of measures and interaction with policy progress in international fora) -single choice reply-(optional)	No opinion
Should other criteria be used? -single choice reply-	Yes

(optional)

Please substantiate your answer. -open reply-(optional)

Risque de report modal à l'envers. Il est important de rester constant dans les politiques européennes (notamment celles de report modal).

Regardless of the option proposed, should the maritime sector be in principle authorized to use international credits (e.g. from the Clean Development Mechanism) for its compliance ?

-single choice reply-(optional)

Should the maritime sector be authorized to use international credits subject to quantitative and qualitative limits, along the same lines as for other sectors?

-single choice reply-(optional)

## General comments

Please feel free to give any additional comments. -open reply-(optional)

Attention aux actions qui pénaliseraient le shortsea. Il est très important que tous les modes de transports en intra-européens soient traités de manière à éviter les distorsions de concurrence et favoriser les modes les plus globalement favorables à l'environnement. Pour atteindre cet objectif, il est nécessaire que les Commission réalise des études d'impact sur le shortsea shipping afin de conserver l'équi-compétitivité avec les modes de transport concurrent en intra-européen (modes terrestres majoritairement). Il ne faut pas oublier les engagements de mobilité durable en Europe.