



ECSA

European Community Shipowners' Associations

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**European Commission proposal for a
DIRECTIVE OF THE PARLIAMENT AND OF THE COUNCIL
on the deployment of alternative fuels infrastructure**

LNG Refuelling Points for Maritime Transport

**ECSA POSITION PAPER
(29.11.2013)**

Regarding the implementation date for the refuelling points for LNG as discussed by the European Institutions within the framework of the Commission proposal for a Directive on the deployment of alternative fuels infrastructure¹, ECSA is supportive of the following European Commission's compromise text:

Member States shall ensure that:

- *an appropriate number of refuelling points for LNG is provided at their maritime ports to allow for the circulation of LNG ships and vessels throughout the Trans-European Transport (TEN-T) Core Network by 31st December 2019 at the latest. Member States shall co-operate with neighbouring Member States where necessary to ensure adequate coverage of the Network.*
- *refuelling points for LNG are available for all maritime ports of Trans-European Transport (TEN-T) Core Network by 31st December 2030 at the latest.*

Justification:

In response to Member States' views and concerns for non-binding targets, ECSA is of the view that the Commission's compromise text proposes full flexibility as to how to provide the LNG in order to respect local conditions and expected fuel demand. According to Article 2.8, LNG refuelling points can be on-shore (including tanks, but also mobile provision via trucks is possible) or off-shore (e.g. via bunkering barges). One might also see evolutions over time in specific ports, from initial provision via truck

¹ COM(2013)18 final

to a larger fixed infrastructure when demand is growing. In the said legislative proposal there is a **need for legal certainty issue whilst maintaining flexibility and the Commission's compromise proposal incorporates both elements.**

Furthermore, it should be noted that the reasoning behind the 2019 deadline for an appropriate number of refuelling points for LNG is to coincide with the compliance date of the Sulphur Directive outside SECAs (i.e. 01.01.2020). This would aim at facilitating the conditions to comply with the requirements of the Sulphur Directive.

As for the 2030 deadline to ensure the availability of LNG refuelling points for all maritime core ports, it should be underlined that the said obligation for Member States is not to have LNG Refuelling points to each single core port. If for example there is a Member State with 7 core ports in its territory, it could effectively meet this obligation by actually having only 3 or 4 LNG Refuelling points as long as it proves that some of these points are mobile (tracks or barges) ensuring the provision of refuelling service to more than one port (considering joint approaches between neighbouring ports).

It is also underlined that having an LNG bunkering infrastructure in place (being on-shore or off-shore) - subsidized by TENT-T - will help a quick development as it will lower the price of LNG at delivery to the ship.

Brussels, 29 November 2013.

The European Community Shipowners' Associations (ECSA), formed in 1965, comprises the national shipowners' associations of the EU and Norway. ECSA aims at promoting the interests of European shipping so that industry can best serve European and international trade and commerce in a competitive and free business environment, to the benefit of both shippers and consumers. The European Economic Area maintains its very prominent position with a controlled fleet of 40% of the global commercial fleet.

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