



European Shipowners | ECSA response to the European Commission's consultation on Taxonomy Delegated Acts – amendments to make reporting simpler and more cost-effective for companies

Executive Summary:

• **Strategic Role of Shipping for European Security**

European shipping is an asset for Europe and a cornerstone of the energy, food and supply chain security of the continent. European shipping controls 35% of the global tonnage. European shipping makes Europe a leader in the global supply chains and contributes to the competitiveness of the European economy, which is heavily reliant on trade.

• **Competitiveness through simplification**

Administrative burden should be reduced in practical operations.

Simplification should ensure that reporting and disclosure requirements across the different regulatory acts are consistent in order to avoid increasing complexity and overlapping requirements.

• **Revising the EU taxonomy: removing cargo restrictions**

As a priority, ECSA strongly recommends the removal of cargo-related restrictions from the current technical screening criteria of the EU taxonomy.

• **Ensure access to finance for key investments**

Ensure access to adequate and competitive financing in the EU.

1. Strategic role of shipping for European security

European shipping is an asset for Europe and a cornerstone of the energy, food and supply chain security of the continent¹. European shipping controls 35% of the global tonnage, across all key shipping segments, such as bulk carriers, container vessels, and energy carriers. The sector accounts for over €127.8 billion in GDP impact, employs 685,000 people directly². Even in times of geopolitical uncertainty, European shipping makes Europe a leader in the global supply chains and contributes to the competitiveness of the European economy, which is heavily reliant on trade. International trade is 57% of the global GDP. The EU is

¹ [Deloitte study on the Competitiveness of the European Shipping Industry, 2025](#)

² [CE Delft study on the Economic Value of European Shipping, 2025](#)



significantly more reliant on trade, which represents on average 100% of the EU's GDP compared to key economies like China (37%) and the US (27%). European shipping enables 76% of the EU's external trade, supports energy and food security, and is central to the decarbonisation of the European economy.

European shipping controls around 35% of the global fleet, which is significant considering that the European economy represent 15% of the global GDP, but global competition is intensifying. The share of EU-controlled fleet has declined from 39.5% over recent years. At the same time, shipping centres in Asia and the Middle East are offering more attractive and predictable business environments. To remain a global maritime leader, ensuring a globally competitive environment in Europe while supporting the green and digital transitions is key. A business-friendly environment and adequate ship finance plays an essential role in this.

2. A business-friendly environment: competitiveness through simplification

European Shipowners | ECSA welcome the efforts of the European Commission to reduce the administrative burden. This is particularly important considering that 90% of European shipping companies operate less than 10 vessels.

The 2025 Deloitte Competitiveness Study³ shows that business-friendly conditions—such as regulatory predictability, simplified procedures, and alignment with international rules—are common features of successful global maritime hubs.

Today, European shipping faces a growing administrative burden which leads to disproportionate compliance costs, especially for smaller companies, and risks undermining Europe's attractiveness as a maritime hub. A meaningful simplification is essential. A fit-for-purpose taxonomy that enables the maritime sector's transition, while safeguarding competitiveness and supply chain security can play a role here.

European Shipowners | ECSA welcomes that the European Commission is proposing to reduce the burden under the Taxonomy Regulation. Currently, finance providers and investors have to report and disclose under the Taxonomy Regulation. Even if their reporting burden is reduced, in order to comply with the requirements, they still need data from their clients. Therefore, there may be still an indirect reporting obligation from shipping companies towards their banks and investors. Reducing the burden for the economic actors which are under the scope of the Taxonomy Regulation may not be translated directly into reducing burden for shipping companies. **European Shipowners | ECSA, therefore, calls for the European Commission to ensure that the administrative burden is also reduced in practical operations.**

European Shipowners | ECSA also calls the European Commission to make sure that reporting and disclosure requirements across the different regulatory acts are consistent in order to avoid increasing complexity and overlapping requirements.

³ [Deloitte study on the Competitiveness of the European Shipping Industry, 2025](#)



3. Revising the EU taxonomy: removing cargo restrictions

As a matter of priority, European Shipowners | ECSA strongly recommends the removal of cargo-related restrictions from the current technical screening criteria of the EU taxonomy. As clearly stated in ECSA's position, shipowners do not control the type of cargo transported—this is determined by global market forces. Penalising shipowners based on cargo type could lead to unintended consequences, distort investment signals, and undermine the availability of sustainable finance. (Annex 1: ECSA position on Cargo requirements)

The taxonomy should remain focused on the maritime economic activity itself, recognising the environmental performance of the vessel and not the market-driven nature of the goods it transports.

4. Financing the transition: to maintain competitiveness

To maintain and advance its competitive edge vis-à-vis its key global competitors, EU shipping needs access to competitive financing in Europe.

For the EU, there is a lot at stake in this respect. Adequate financing helps to maintain shipping companies' presence in Europe, which in turn ensures that the related added value will remain in Europe and that innovative and sustainable solutions for shipping can be developed and promoted from Europe. Having a strong ship financing community in Europe also benefits the European maritime cluster and the European economy at large.

With increasingly stricter banking capital requirements and many European banks scaling down their ship finance activities, it is essential to reverse this trend in ship financing whilst at the same time to look at financing tools that are best suited for the shipping industry. In this light, and given the market impact of taxonomy definitions, it is even more vital that the taxonomy provides the right incentives for investors to finance the energy transition of the shipping industry.

Bridging the investment gap—estimated at over €40 billion annually—requires a taxonomy that is usable in practice, tailored to the sector's needs, and able to unlock private finance for the transition.

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SHIP FINANCING

ECSCA input on the future maritime taxonomy definitions with a focus on the treatment of cargo

ECSCA welcomes the initiative of DG MOVE to conduct a study on the EU maritime taxonomy as an input to the work of the Sustainable Finance Platform.

ECSCA is of the strong view that cargo-carried should not be in the scope of EU shipping economic activity when defining the EU maritime taxonomy.

Shipowners do not control the market demand and supply of the goods transported, therefore penalising the shipowners' economic activities by restricting financial means would be unfair and would lead to negative unintended consequences for EU shipowners and the EU maritime cluster.

ECSCA would like to reiterate that the European shipping industry is committed to taking the global lead for clean shipping¹.

The European shipping industry is a capital intensive industry and many vessels are one of a kind. For the shipping industry, it is also key to ensure access to innovative and sustainable solutions which can drive the entire maritime industry towards a greener and more sustainable future, including in key areas such as GHG and air emissions, waste management, and to do no harm to marine life. At the same

time, taxonomy definitions will directly impact the cost and the availability of finance for the European shipping industry.

To maintain and advance its competitive edge *vis-à-vis* its key global competitors (notably in the Far East), access to competitive financing in Europe is crucial. For the EU, there is a lot at stake in this respect, since adequate financing helps to maintain shipping companies' presence in Europe, which in turn ensures that the related added value will remain in Europe and that innovative and sustainable solutions for shipping can be developed and promoted from Europe. Having a strong ship financing community in Europe also benefits the European maritime cluster and the European economy at large.

In this light and given the market impact of the taxonomy definitions, it is vital that the taxonomy is targeting that economic activity which has the power to initiate the transition.

ECSCA, therefore, would like to express its views on how the cargo should be treated under the EU maritime taxonomy from the point of view of the EU shipping industry.

Cargo should not be in the scope of EU maritime economic activity

The European Commission's "Taxonomy Regulation" aims at developing a unified classification system on which activities can be considered environmentally sustainable for financial services. The purpose of this legislative proposal and the related TEG's Technical Report on EU Taxonomy is to channel investments into economic activities, where these economic activities are considered green. ECSCA understood that the previous work of the

¹ ECSCA position on Ship Finance, January 2020

Technical Expert Group points towards an asset based economic activity definition, which translates into vessels when we look at EU shipping.

In this light, ECSCA is of the view that under the EU maritime taxonomy a clear distinction should be made between the treatment of cargo, and the maritime activity per se.

The European regulators consider that some types of goods should not be recognized under the taxonomy due to their potential not to satisfy either of the following: the significant contribution to at least one environmental goal and the do no significant harm (DNSH) principle to the others.

ECSCA would like to draw the attention to the important feature of cargo – in the meaning of transported goods – namely, that it depends on a number of exogenous market- and industry factors, which the shipping industry cannot influence.

A striking example

The following example demonstrates the issue. A vessel is being built to carry liquid cargo. A shipowner investing in a vessel can possibly choose for a green solution in terms of what type of fuel or energy carrier the vessel is using. Let us assume that the vessel is running purely on electricity provided by renewable energy sources, and hence it is a zero emitting vessel which does not do significant harm (DNSH) to the other environmental objectives.

In principle, the ship can carry different liquid cargos, some of which may be fossil fuel based, some of which not. For instance a product tanker in principle can carry biomass as ingredients to biofuels. The type of goods carried by the vessel depends on the market demand and supply of the given good. Shipowners do not control this demand, but certainly can

provide the fastest and most environmentally friendly way for global and regional transport.

Additionally, with regards to the influence of shipowners on market demand and supply, we have to point to the role of charterers in international shipping and especially in bulk shipping where they are a 'structural' part of the carriage of seaborne trade. Ships are in effect hired out to charterers who use them to transport cargoes that they obtain, own or control. The vessels, their owners and operators are under contractual obligation to carry such cargoes as per the charterers requirements and instructions.

It becomes even more complicated when one realises that for example product tankers can carry different cargo in the different cargo tanks at the same time while container vessels carry many different cargoes as a rule even in the same container.

If the characteristics of the cargo are part of the financing conditions for new vessels, it creates a number of issues. First, many vessel types can carry many different types of cargo, making it impossible to determine the characteristics of the cargo to be carried over the life time of a vessel (and even for the duration of a time-charter contract).

Second, our shipowner can face a higher cost of funding for the same "green" vessel due to the cargo characteristics.

Third, given the strong, globally competitive market, the shipowner cannot transfer the higher cost to the customers. In that case, building a zero-emission ship will not be financially supported and the objectives of the Taxonomy Regulation will not be fulfilled. In addition, other competitors with cheaper – but less green – vessels, from outside Europe will take over these customers and/or other modes of transport will be chosen, which become

relatively cheaper, but environmentally less efficient. Finally, the risk of penalising small- and medium size shipowners is also apparent, given that large companies have more channels to access financing outside Europe.

Unintended consequences

Shipping is the most efficient transport mode available and has been undertaking successful steps towards decarbonisation.

Including cargo in the scope of maritime economic activity under the EU taxonomy bears the risk of:

- penalising shipowners through financial means for activities they do not have an influence on;
- discouraging transport by European shipowners for certain goods without added value in terms of environmental objectives;
- damaging the competitiveness of the EU shipping industry;
- penalising SMEs in the long term;
- unintended shift of transport modalities towards environmentally less efficient transport modes.
- Creating very complex and even impossible to solve implementation and enforcement problems

In this context, ECSA calls the European Commission to exclude cargo from the scope of maritime economic activities under the EU Taxonomy.

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ECSA is a trade association representing the national shipowners' associations of the EU, Norway and the UK. The European shipowners control 39.5% of the global commercial fleet. ECSA promotes the interests of European shipping so that the industry can best serve European and international trade in a competitive free business environment to the benefit of shippers and consumers.