

Feedback Zeevaarttafel Internet consultation 'Besluit energie vervoer'

6 January 2021

In light of the great challenge for the maritime sector to reduce its climate impact, the Zeevaarttafel believes that the renewable fuel volumes built up for the maritime sector, stimulated by the opt-in scheme, should be handled carefully. Possibly international mandates will be announced soon (FuelEU Maritime initiative), and this will have in particular an impact upon the Netherlands which has the largest bunker sector in Europe.

In a renewable fuel refining process, more and less processed hydrocarbons fuels are produced simultaneously, the lesser processed hydrocarbon fuels, usually reaching higher GHG-reductions, being suitable for use in engines for seagoing shipping.

The Platform recommends making good use of these renewable fuels in different quality grades. This is stimulating circular developments. Deployment of sustainable biofuels in the shipping sector replaces fossil fuels and as such has a positive effect on the overall decarbonization of the shipping sector. Moreover, it strengthens the business case for upscaling production of renewable fuels for aviation and for road transport. These synergies can create interesting economic propositions for the Netherlands.

In this regard, the Platform would like to better understand the position of the ministry how it intends to stimulate the deployment of renewable fuels in the maritime sector. The introduction of the opt-in was meant as a starting engine for renewable fuels in this sector. It is quite concerning to discontinue the use of these volumes, to only realize that these will be needed again anytime soon.

Notably, given the scale of maritime bunkering in the Netherlands and the expected international targets (perhaps already announced in Q1 of 2021), it is important for the Netherlands that the sector is well prepared for and adjusted to a changing playing field.

According to the Zeevaarttafel the exclusion of the shipping sector from the HBE system, without a separate mandate or system in place is a bad signal to the sector and investments previously done. The sector needs a more secure climate to make investments to ensure the increase of renewable fuels. The Zeevaarttafel believes in a continuation of the opt-in for as long as there is not a separate mandate:

- under the condition of a yearly volumetric limit (to avoid competition with the road sector)
- should include at least both Annex IX A and Annex IX B fuels
- The opt-in should be replaced by an international sector mandate to ensure continuity.
- The end date should depend on the start date of international regulation or a dedicated (international) mandate/regulation for shipping. This to prevent a gap.

The use of the HBE-system is recommended as a national instrument for the Netherlands to comply with international mandates. It is a technology-neutral system that provides flexibility to introduce various renewable energy carriers.

Stakeholders in the sector have consistently advocated for the introduction of a 'HBE Zeevaart' over the past two years. The sector has made clear that a 'HBE Zeevaart' would be helpful and

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parties don't consider an additional 'HBE Zeevaart' including the several categories as very complex to implement in their operations.

A 'HBE Zeevaart' offers you the possibility to a.) set a limit to the annual volume that can be used within the opt-in scheme and b.) prepare the system for the implementation of international agreements.

Therefore, the Zeevaarttafel recommends introducing a HBE Zeevaart to ensure continuity.