Ms. Charlina Vitcheva
Director-General for
Maritime Affairs and Fisheries (MARE)
European Commission
Rue Josef II 99
1000 Brussels
Belgium

Dun Laoghaire, 6 August 2021

Subject: NWWAC feedback on the initiative "CO2 emissions of engines – methodology for their reduction"

Dear Ms Vitcheva,

The North Western Waters Advisory Council welcomes the opportunity to provide feedback on the draft Implementing Regulation establishing the European Maritime, Fisheries and Aquaculture Fund and amending Regulation (EU) 2017/1004 as regards the identification of energy efficient technologies and the specification of methodology elements to determine the normal fishing effort of fishing vessels.

The present feedback has also been examined by the MEDAC, CC RUP and SWWAC Executive Committees who agreed to grant their support after contribution to the final draft by some of their members.

First of all, the NWWAC would like to highlight that in this day and age, modern (gas oil) engines must lead to a large reduction of environmental impact according to the IMO-legislation. In addition, the European fishing industry has already taken many steps through efficient technologies that contribute to a reduction of CO2 emissions. Examples are the use of Cruise Control, econometers and specific training for crew members. The NWWAC therefore recommends taking this into account when establishing reference points for the reduction measurement.

Moreover, NWWAC members wish to point out that, as a primary sector, the fishing sector provides the necessary and sustainable food to EU citizens with the lowest carbon footprint of all healthy and nutritious protein sources. However, it is important to note that the impact of fishing on carbon rich ecosystems like seagrass meadows, which are known to contribute to the fight against climate change, are not taken into account when calculating the footprint of fish protein. Specific comments and feedbacks to the articles included in the draft Implementing Regulation are provided below.

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- Article 1:

Article 18 (5) second paragraph point (a) says that *« the new engine uses energy efficient technology and the age difference between the new and replaced engine is at least 7 years* ». NWWAC members are concerned about the list of "energy efficient technologies", including hydrogen, ammonia and alternative fuel. These technologies are not mature yet and it is unlikely that these will be successfully adapted to work on fishing vessels before the end of the European Maritime, Fisheries and Aquaculture Fund (EMFAF) programming period until 2027.

- Hydrogen and other new technologies have several limits, especially related to storage on board, which can compromise catch storage, affecting EU management by capacity of the fishing effort, in turn potentially impacting the crew accommodation and ship's safety areas.
- While ammonia certainly has the energy potential for a marine fuel, to date most of it is the product of a highly carbon-intensive process. The supply of "green" ammonia, produced using carbon-neutral methods, still needs to develop properly. Other challenges including toxicity, corrosiveness, slow ignition, and NO emissions are also still being investigated.
- It is not clear what the text refers to when it mentions "any other zero direct (tailpipe) CO_2 emission fuel".
- For what concerns engines powered by electricity, in view of the technologies currently being developed for transport on land and future difficulties in calculating the engine power of an electric motor, this technology will hardly be available for fishing vessels before 2027.
- Only electric/fuel hybridization seems to be within reach (in the short term). However, the degree of hybridization required is not specified.
- It is not clear why the text is only mentioning fuel cells and not internal combustion as well, which has shown to be cheaper. Also, the list mentions only the ICE hybrid and not the fuel cell hybrid.
- There is not mention of new zero-carbon vessel propulsion technologies like wind-assist technology which can dramatically lower fossil-fuel carbon emissions in the short term, and help prepare the industry for a new era of scarce and more expensive future zero-carbon fuels.

- Article 2:

Article 18 (5) second paragraph point (c) seems complicated to implement (and likely to slow down funding applications if a thorough case-by-case study is needed). The measure based on the average of ten representative fishing trips over the three calendar years preceding the application for support implies that it will be necessary to define what a "representative trip" is. In particular, this can be complicated for mixed fisheries and vessels which change activity during the year (e.g. a trawler that alternates between bottom and pelagic fishing). Moreover, the definition of "representative trip" has to integrate parameters which are not always easy to measure: characteristics and fishing patterns, time spent at sea, fishing travel/activity, engine power used, associated sea conditions, etc. The NWWAC recommends considering an average based on annual consumption and accompanied by certification from the engine manufacturer of a better efficiency of the replacement engine, based on a comparison of engine specific consumption and type of engine.

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It is important to not limit the list to what is now considered to be a "efficient" technology. This list should be left open, to take into account other technologies that are not listed or do not exist today. Otherwise, there is the risk that it would strongly limit the applicants' possibility to be eligible for the replacement or modernization of the engine (article 18.2 point (d)).

NWWAC members also highlights that the bureaucratic procedures for verifying emission reductions or fuel consumption should not unduly slow down the effectiveness of the measure.

Moreover, the NWWAC points out that it is regrettable that under the new fund there is no support for alternative emission reduction measures that don't induce fishing overcapacity for all categories of fishing vessels. It is the NWWAC's view that any contribution to achieving the Green Deal objectives through investment in energy efficient technologies should be eligible for such support, but only when such measures don't induce overcapacity and overfishing of the EU fleet.

Finally, the NWWAC notes that this policy, as well as international commitments, seem to be framed solely on CO_2, but all GHG should be considered in the transition. For example, LNG may represent a solution to comply with regulations reducing CO_2 emissions, however methane has a stronger GHG effect than CO_2. We recommend that research is carried out looking at costs for fishing vessels (including small-scale vessels) for the different groups of fuels, including fuels from renewable electricity, bio-fuels and blue fuels derived from natural gas on land, with carbon sequestration equipment on the production process, to estimate what the sum of the capital cost, i.e. the investment made on the vessel for storage for example, and the actual fuel cost would be and their evolvement over the next decades. Results from this analysis could support the definition and adaptation of national and international strategies towards fleet decarbonisation.

Thank you for your attention on this matter. We look forward to hearing from you soon.

Yours sincerely,



Emiel Brouckaert
NWWAC Chairman

Also signing on behalf of:
Giampaolo Buonfiglio, MEDAC Chairman
David Pavón González, CC RUP Chairman
Aurelio Bilbao, SWWAC Chairman

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