

European Commission
Directorate-General Climate Action
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Consultation on the revision of the policy on monitoring, reporting and verification of CO₂ emissions from maritime transport

The Swedish Shipowner's Association (SSA), consisting of 55 shipping companies controlling a fleet of approximately 400 vessels is grateful for the opportunity to provide input to the European Commission's latest consultation exercise on the revision of the policy on monitoring, reporting and verification of CO₂ emissions from maritime transport.

The SSA provided input on the subject at the first consultation (July 2017) where we did call for a full alignment of the EU MRV with the IMO DCS, in particular the definition of cargo, which we still opine. Our response to the first consultation can be seen here: http://ec.europa.eu/info/law/better-regulation/initiatives/ares-2017-3112662/feedback/F2063_en

With regards to the present consultation, SSA wishes to make the following comments, in addition to the answers we have provided to the questionnaire – which we are afraid could be taken out of context if read in isolation. Therefore, we request that this letter shall be read in conjunction with our answers to the questionnaire and; should the questionnaire with the SSA answers be published this statement is to be attached.

SSA strongly advocates full alignment of Regulation (EU) 2015/757 on the monitoring, reporting and verification of carbon dioxide emissions from maritime transport (the MRV regulation) with the IMO data collection system (DCS) for several reasons. The SSA notes that Recital 34 and Article 22.3 of the MRV Regulation commit the European Commission to reviewing Regulation (EU) 2015/757 and, if appropriate, to proposing amendments to align it with a global reporting system.

A full alignment with the IMO DCS will make submission of separate data to the EU system unnecessary. In addition, requiring ship operators to manage two distinct and separate reporting systems which collect the same data will add additional costs and administrative burdens for no overall benefit, while potentially undermining support among non-EU Member States for making further progress at IMO on the development of additional CO₂ reduction measures.

The SSA asserts that the IMO DCS is indeed an appropriate global reporting system, involving none of the complex and misleading cargo parameters for calculating transport work which is included in the EU MRV.

A full alignment of the EU MRV Regulation with the IMO DCS will therefore demonstrate the EU's continuing commitment to working with all IMO Member States towards a global solution for reducing GHG emissions from international shipping. This is particularly important as IMO develops, with the full support of EU Member States, its initial IMO Strategy for the reduction of GHG emissions, for adoption by MEPC 72 in April 2018

Another reason, but equally important, is that many non-EU Member States supported the adoption of the IMO DCS on the clear understanding that the EU would then align its regional system with what has been agreed for global application. A very important element of this understanding was that any data collected from individual ships would be anonymised.

Full alignment of the EU and IMO systems would therefore be well-received by non-EU Member States as clear evidence of the EU wishing to honour an implicit commitment to accept what has been agreed by IMO for global application. Significantly, this will help facilitate global agreement on a suitably ambitious IMO GHG reduction strategy containing additional candidate measures, including further CO₂ reduction measures that can be implemented globally in the short term, before 2023.

SSA therefore requests the Commission to undertake a full alignment with the IMO DCS without delay, in order to demonstrate its confidence in the work of IMO and in the interests of promoting further co-operation on GHG reduction at the global level.

Further, the SSA is of the opinion that the consultation document would have been easier to answer should it have had genuine full alignment as an option. "Full alignment" as envisaged by the Commission on page 9 will still require reports for voyages to and from EEA ports to be submitted to the EU system. It is our firm view that this is not full alignment; full alignment would be a single global data collection system, i.e. the IMO DCS.

Since we consider full alignment to be the only appropriate outcome it has been problematic in ranking the priorities of the EU MRV page 11 in terms of priority for alignment with the IMO DCS. The only correct answer should be that the two systems are either aligned or not aligned.

We sincerely hope our concerns as raised above will be duly taken care of as a matter of priority.

Yours faithfully,



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