



Introduction to the questions of evasion in designing a policy

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Studies Used

- | **IHS Study – *Ships Port Visits***
- | **2009 CE DELFT Study – *Technical support for European Action to reducing Greenhouse Gas Emissions from international maritime transport***
- | **2010 UMWELTBUNDESAMT: *Integration of Marine Transport into the European Emissions Trading System***



Types of Ship

- | **Some ships may evade more easily**

- | **Containers (IHS, CE DELFT):**
 - Part load or part discharge between three or more ports
 - Use large ports as hubs and from there use feeder vessels

- | **Other segments more bound to a certain port**



- EEA deep sea haul
- EEA feeder haul
- Alternative deep sea haul
- Alternative feeder haul



Geographical Scope

Distance/Route based system (CE DELFT, DE Study):

- | **highest evasion risk compared to scope covering EU territorial waters, Intra EU routes and time period scope.**
- | **high environmental effectiveness**



CE DELFT Proposal

Proposal from CE DELFT:

- | **Ships with single bill of lading will have to cover their emissions the last port of lading to the EU port**
- | **Ships with multiple bills of lading will have to cover their emissions from the last port of call to the EU port**



Some questions to be addressed

- | **Are the bills of lading reliable?**
- | **Do the potential “evasion ports” have sufficient capacity?**
- | **What about the ballast voyages? (voyages that take place between ports of discharge and loading ports where the vessel is carrying no cargo)**



Further Questions to be addressed

- | **How can we find a balance between environmental effectiveness and low evasion risk when designing a policy?**
 - | **Is it a question of trade offs?**
 - | **How can evasion be fully minimized?**
 - | **Assuming strong MRV and enforcement policies, can incentives be given to ensure compliance? which ones?**
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Thank you for your attention!

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