

## **The City of Stockholm's feedback to the consultation on *FuelEU Maritime***

The City of Stockholm welcomes FuelEU Maritime. The initiative aims to decarbonise maritime transport through a holistic approach but it also emphasizes economic and social impacts to a greater extent than environmental benefits. The environmental benefits focus on air emissions and noise related directly to combustion of fossil fuels, omitting the potential of promoting resource-efficiency and circular economy through the use of locally-produced fuels such as biomethane, reduction of oil pollution to waterways, etc. There are wider benefits to the decarbonisation of maritime transport and logistics to consider.

Sweden has a large potential for producing biofuels from farmland and forestry. Limitations proposed/already set up by the EU hinder an increase in domestic biofuel production. Increased biofuel production from farmland and forestry could be beneficial for the environment and give increased independence from fossil fuels and improve the economic viability of farms. The commission needs to take into account though that the situation is different in different member states and restrictions necessary in some countries should not be applied across all EU.

The City of Stockholm welcome the proposal to enhance predictability about investments in sustainable alternative fuels. Measures should also be taken to ensure that sustainable alternative fuels are promoted e.g through discounts or other instruments used to facilitate production/use of alternative fuels. Environmentally-differentiated charges (fairway dues, port fees) have been used to achieve some forms of compliance whilst promoting transition to more sustainable practice; such instruments could be used to promote rapid transition to the most sustainable alternative fuels.

The emphasis on OPS is positive and here renewable electricity is key. In this context it is important to have a technology neutral approach. Alternative solutions that achieve the same goal, a low/zero emission port area, should also be encouraged. The potential impacts on grid capacity in urban areas (e.g related to the electrification of vehicle fleets) need to be emphasized. The

adoption of OPS by some ship-owners and ports is slow – a mix of compulsory measures and incentives promoting high performance is likely to have impact. One compulsory measure could be mandatory OPS for vessels at berth. This requires costly investments in infrastructure by ports and the profitability is uncertain. The introduction of a fund from e.g ETS to support green port investments, that otherwise would not be economically viable, would be beneficial.

It should be expensive to dock in ports without OPS and/or to operate auxiliary engines in port areas. The model used need to be competitive, otherwise the shipping companies will choose the port that has lowest fees which in turn could lead to more road transports.

FuelEU Maritime need to consider environmental impacts of vessels both at sea and in port, but also measures to address port operations, onward transportation and supply chains (see World Ports Sustainability Programme) within the port city and hinterland. It is vital that ports and port cities address challenges in a coherent, collaborative way with regard taken to the demands placed on vessels but also to e.g. propulsion of road vehicles. Efforts should be made to improve environmental performance of vehicles accessing port areas – such systems require harmonisation with both urban access restrictions and a standardised approach across Europe. The Commission could also consider measures to limit access, for worst-performing vessels/vessels deemed non-compliant, to key ports and in particular to port areas in urban conurbations.

The transition to alternative fuels require parallel efforts to align European/national policies more coherently to ensure that sustainable alternative fuels can be produced, distributed and used efficiently.