

IMO Measures vs EU Measures

FUEL EU Maritime Regulation and ETS Directive

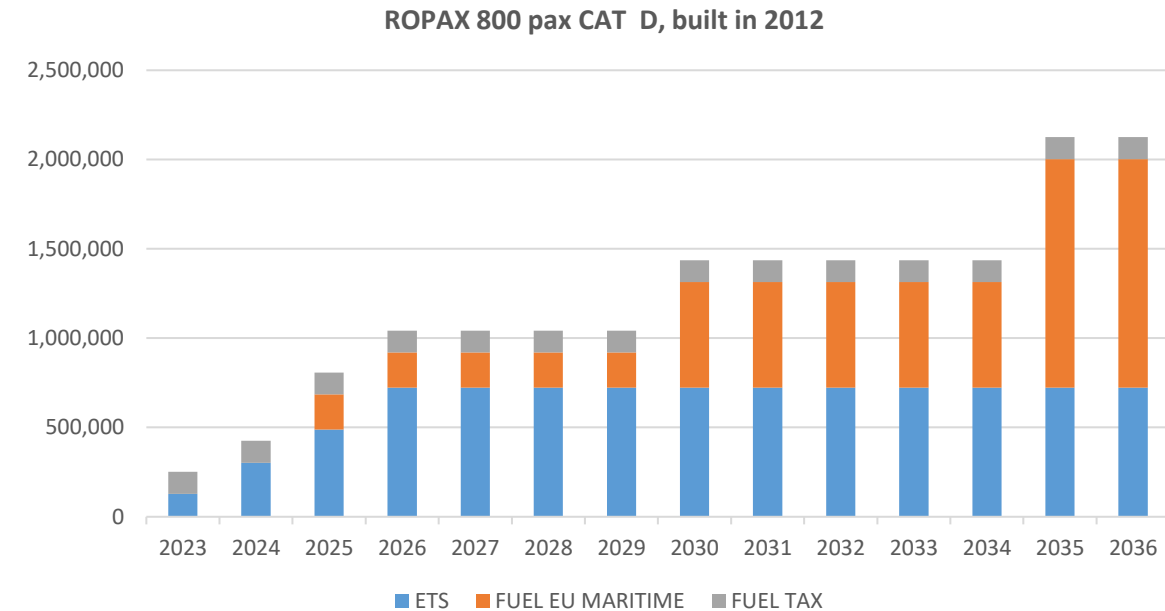
- Applicable to ships from 5000 GT
- 100% between ports in the EEA and 50% on international voyages entering or leaving the EEA.

FUEL EU

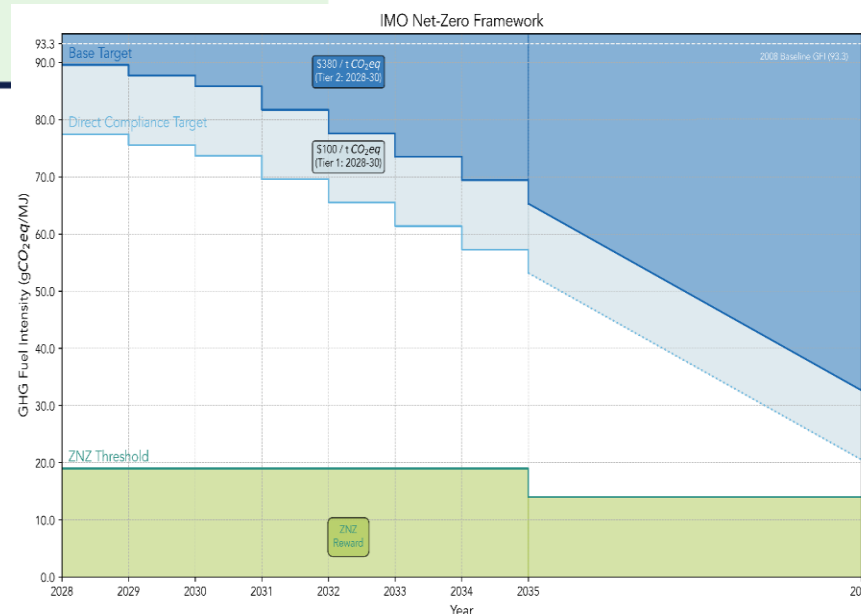
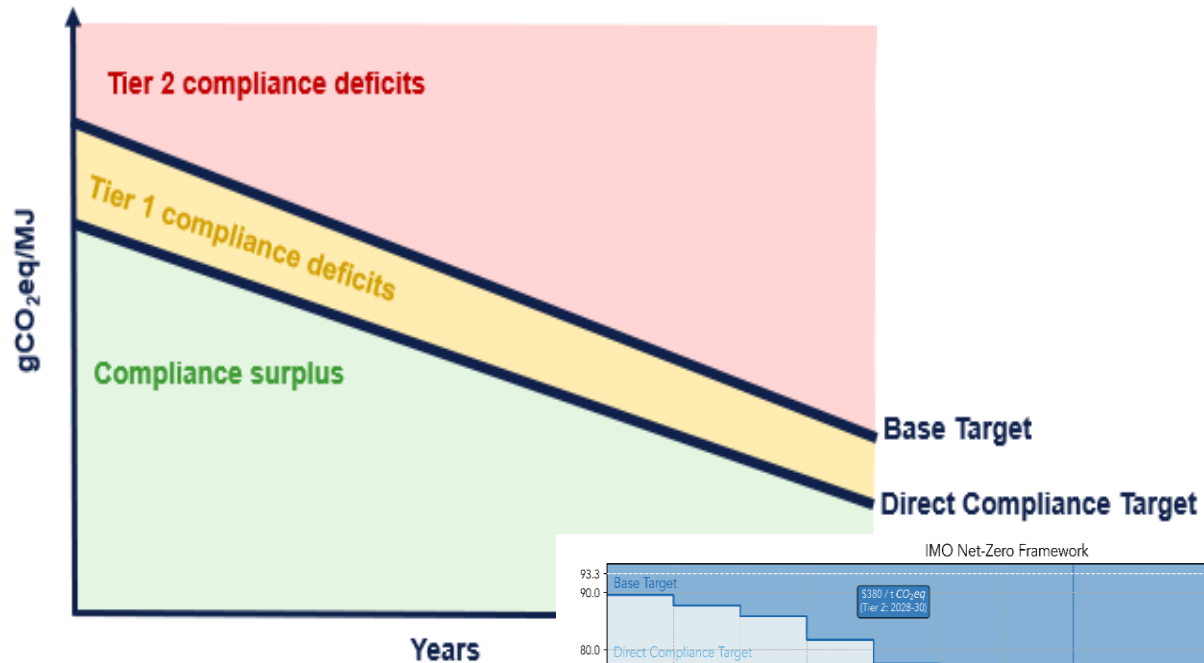
- Greenhouse gas intensity “well to wake” (well to tank + tank to wake) based on the energy used [GHGEI, (grams CO₂eq/MJ)]:
- Port electrification and use of OPS in passenger and container ships
- Multipliers for RFNBOs from 2025 to 2035

ETS

- Contribution from ton 0

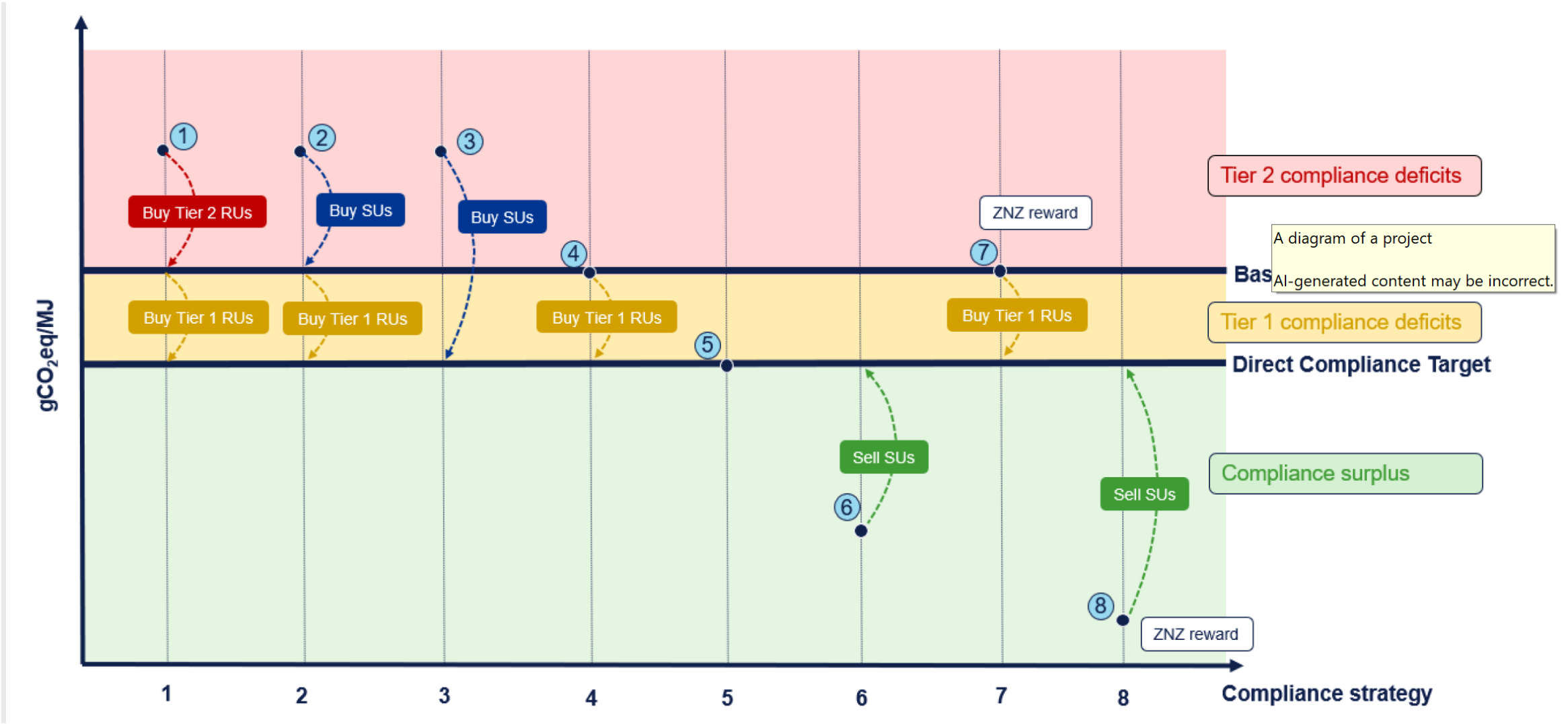


Net Zero Framework/Greenhouse Gas Fuel Standard

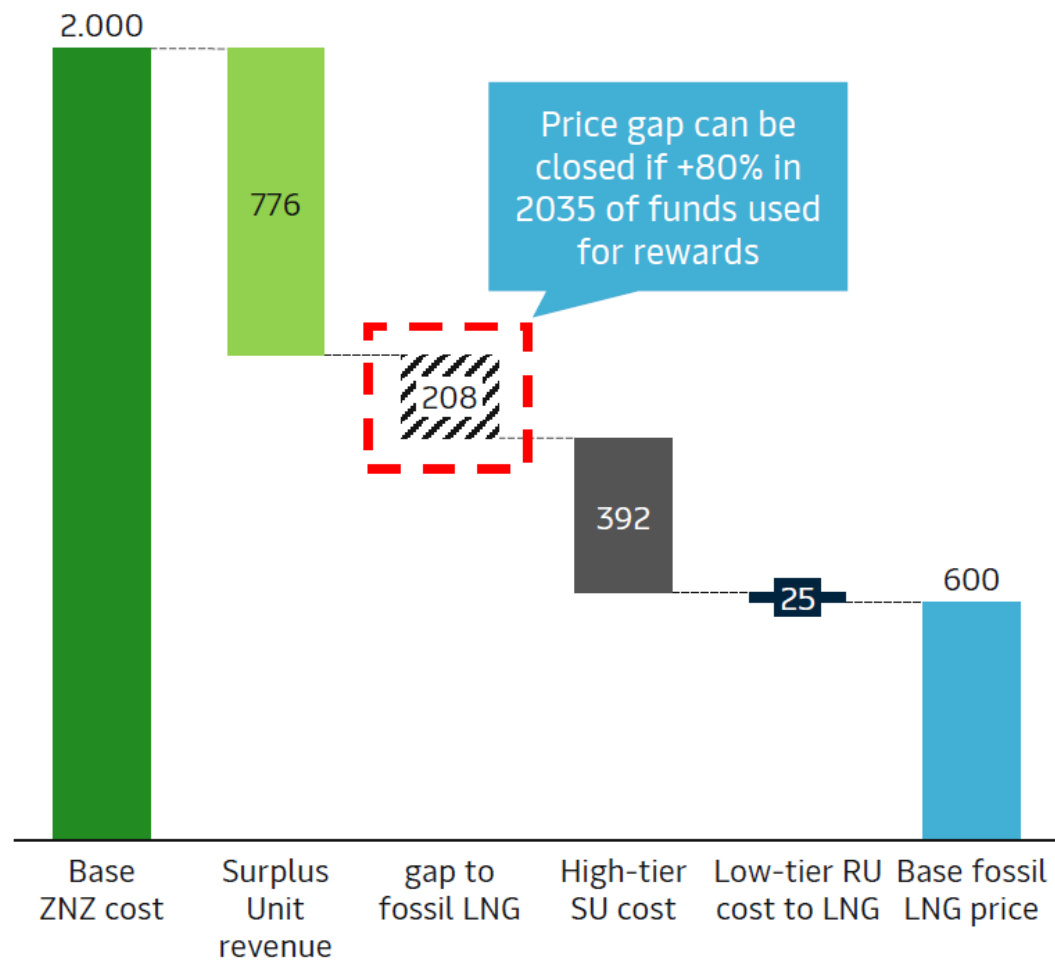


- The ship pays for two, one, or no tiers until it lowers its index into the green zone by purchasing “remedial units” (buying CO_2).
- If the index is above the upper line, it pays a Tier 2 remedial unit (RU) at 380 USD/ton CO_2 until reaching the tier 2 annual reference index, and Tier 1 RU at 100 USD/ton CO_2 until reaching the tier 1 reference index.
- If it stays in the green zone, it generates a “surplus.”

Net Zero Framework/ Greenhouse Gas Fuel Standard



Net Zero Framework/ Greenhouse Gas Fuel Standard



Two-tier system as-is

- Reward level
- Fuel certification
- Lifecycle analysis
- RFNBO multipliers

Net Zero Framework/ Greenhouse Gas Fuel Standard

- The GFS decarbonization path is gradual until 2035, allowing transitional fossil fuels like LNG and the use of biofuels with no incentive to change.
- GFS would not sufficiently incentivize synthetic fuels (RFNBOs) unless with very high rewards.
- IMO's lifecycle analysis could conflict with RED III directive on first-generation biofuels.
- GFS excludes domestic emissions, justifying the continuation of FUEL EU and ETS, but simplification is urgent.

Net Zero Framework vs ETS&FUEL EU

European regulations should align with international standards to avoid gaps and overlaps. “Have your say” open for ETS.

ETS:

- GFS is a market-based measure. In 2028, there will be double contribution.
- ETS would need 100% alignment with IMO. If maintained, EU vs non-EU distortion will continue.

FUEL EU:

- Adjust its curve to the GFS base level?
- Imitate the surplus credit system?
- Revise its penalty and reward system?
- Imitate GFS’s “possible technological neutrality”?
- Harmonize emission factors and align lifecycle analysis?

Otherwise, the economic and administrative burden will be extremely high.

2026 is a key year for the sector to express opinions and influence Member States and the Commission.