

EBU position paper: regarding voluntary emission standards on existing engines (CESNI/PT (17)a 61 rev. 1) related to the CCNR ad hoc meeting 26th of September, 2017

The European regulation for marine engines for inland shipping, the so-called 'Non Road Mobile Machinery' (NRMM) Regulation is in force. That means that from the first of January 2019 new marine engines with a power output of less than 300 kW must meet the new NRMM regulation criteria. For marine engines with a power output above 300 kW new criteria apply from the first of January 2020.

As for now the CCRII criteria from the CCNR are in force until the NRMM regulation comes into force. CCNR is organizing an ad-hoc meeting to work out the possibility of voluntary standards on emissions for existing engines on the 26th September 2017.

EBU position as for now:

In the past EBU has advocated implementation of the United States Environmental Protection Agency (EPA) Tier 4 standard for several reasons. We also have proposed that this standard - with necessary transitional provisions- should apply for existing engines. The European Commission has refused the EBU proposal to implement EPA Tier 4 for inland shipping.

Our environmental objective is to make all necessary changes and adaptations to international, European and national regulations to integrate the use of innovative technologies and processes. Besides that we are in need of specific aid schemes or fiscal incentives for the investments necessary for the transition to a greener inland shipping industry.

Relevant question is how to proceed further to reach our objectives. The relation between benefits (for society) and the cost (for ship-owners) is to be considered. As for now shippers are not paying voluntary for environmentally friendly transport. The impossibility to charge shippers for those transports is a fact in a free market.

What are the expected benefits associated with voluntary standards?

“Prima facie, the development of common criteria could helpfully support the implementation of national or international investment programs. If voluntary standards include international and transparent criteria, it will be easier to identify the practical solutions eligible for subsidy programs. As reminder, subsidies cannot cover compliance to the legal requirements (in this case NRMM Regulations) but only solutions beyond the legal requirements (greener solutions).”

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Do we achieve the expected benefits with voluntary standards? EBU very much doubt the possibilities for subsidy by developing common criteria or solutions beyond legal requirements. Speeding up greening can be subsidized based on the argument that otherwise existing engines still will be used, repaired or overhauled for several years. There is no legal requirement to change engines or diminish emissions apart from existing regulation such as CCRII. Nevertheless several companies are actually working with all sorts of equipment to reach less harmful emissions. EBU is working on subsidies to speed up of greening and has asked for incentives.

Voluntary emission standards on existing engines in inland shipping?

As EBU we have now taken the position that a voluntary standard on emissions is undesirable. There are serious doubts on the effectiveness of such a standard. Significant reason is the uncertainty and consequences of this standard. The question what it really means for ship-owners is uncertain. Every new standard means inevitability more complexity and costs for ship-owners. We are in favor of keeping the existing Stage V standard as it is. Accelerate of greening can be done by subsidizing additional costs of Stage V engines. The environmental advantage will be huge. Then ship-owners are sure their engine is in the near future sufficient for the environment and also for demands from the European administration.

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