

From: [Fanny Lossy](#)
To: [ECSA - Committee Safety & Environment](#); [ECSA - National Associations](#)
Cc: [ECSA - Secretariat](#)
Subject: ECSA C-13911 For information – EU ETS: Preliminary findings on the monitoring of risks of evasion
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[C-13911 Annex 1 - 20241003_essf-cceg presentation on ets evasion monitoring.pdf](#)

To ECSA - Committee Safety & Environment
ECSA - National Associations
ECSA - Secretariat

Ref. ECSA C-13911

10-10-24

For information – EU ETS: Preliminary findings on the monitoring of risks of evasion

Dear Members,

On 3 October, DG CLIMA presented its preliminary findings on the monitoring of risks of evasion following the implementation of the EU ETS in maritime transport to the EU MRV/ETS expert group (see enclosed presentation). The monitoring covered the first half of 2024.

In summary, the Commission did not find clear evidence of evasive behaviour due to EU ETS extension to maritime transport so far. While some significant changes in traffic have been observed, they seem mainly related to impacts of the Red Sea crisis. The main findings are the following.

Risk of relocation of transshipment:

- No reduction in port calls, container movements, or transshipment activity at EU ports that could be directly attributed to EU ETS.
- East Mediterranean EU and non-EU ports, except some Turkish ports, have experienced a decline in activity since the Red Sea attacks, while West Mediterranean ports are seeing increased traffic.
- Route changes show more calls to non-EU ports, but no replacement of EU transshipment port calls.
- Several non-EU ports have started to invest for greater capacity well before 2024.

Evasive port calls & changes in order of port calls risk:

- No significant increase in port calls at non-EU ports (UK, North Africa, Turkey) by vessels calling in EU ports.
- Longer voyage distances detected, likely due to operational changes related to the Red Sea situation.
- Changes to routes were announced some operators mainly to increase the number of destinations served (including EU ports) or to mitigate delays arising from the situation in the Red Sea.

Shifting demand to other transport modes with higher environmental impacts:

- No evidence of modal shift for goods entering the EU was found.

Use of ships below size threshold to avoid EU ETS:

- No overall increase in the use of ships below the 5,000 GT threshold on intra-EU or extra-EU voyages.

Assigning best performing vessels to EU routes:

- There is a very similar technical efficiency distribution for vessels used on voyages to EEA ports, so there is no evidence that shipowners assign the

best performing vessels to intra-EU voyages.

Next steps

Monitoring of evasive behaviour will continue, in particular considering the EU ETS phase-in approach and FuelEU implementation, ongoing investments at neighbouring non-EU ports and recent announcements of routes changes for 2025.

The Commission will produce a report based on the data and findings from the ongoing monitoring, which will be published by the end of the year.

Background

In accordance with article 3gg of the ETS Directive, the Commission has to monitor the implementation of the ETS in relation to maritime transport, and more specifically the possible risk of evasion and the impacts of the EU ETS on the overall competitiveness of the maritime sector in the Member States. If appropriate, the Commission could propose measures to ensure the effective implementation.

The data sources used for this monitoring include publicly available sources (Eurostat, UNCTAD, THETIS-MRV and Official national and ports statistics) as well as MARINFO database, SafeSeaNet database and commercial databases and reports. A dedicated tracking and visualisation tool was developed by EMSA (see slide 10). The ECSA Secretariat was not consulted in this process.

I remain at your disposal if you have any questions.

Best regards,

Fanny

Fanny Lossy

Director
Climate, Environment & Maritime Safety

Bd. du Régent 43-44
1000 Brussels, Belgium

+32 2 510 61 30
fanny.lossy@ecsa.eu
www.ecsa.eu



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