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Introduction

On 25 July 2018, the HELCOM secretariat circulated the overview report of the EnviSuM project, focusing on use of alternative fuels by ships operating in the Baltic Sea. CLIA Europe would like to share with HELCOM Maritime 18 the expertise and knowledge of its members and herewith provides a response to HELCOM overview Alternative fuels for shipping in the Baltic Sea Region. The draft was presented at the EnviSuM Workshop held on 23 March in St. Petersburg and the Green Team 2 meeting held on 17 May in Turku. CLIA Europe did not participate in those meetings.

CLIA Europe would like to thank the HELCOM Secretariat for inviting feedback from the industry to the HELCOM overview Alternative fuels for shipping in the BSR. Please find below and attached the comments and suggested improvements of the cruise industry to the circulated draft.

Please note that we have focussed on the first half of the document and have not provided detailed feedback on the second half. To facilitate the inclusion of the expertise of our members would require too extensive amendments to the content as well as the structure of the document.

It seems that the document has been based on inappropriately dated/stale information (e.g. the reference to DNV GL 2014 study and emission comparison of 2015 without taking into account the CO₂ gain when reducing methane slip). Furthermore, the text contains imprecisions, mixes facts and opinions and we note that possibly, the language used may be an issue and we suggest that you assess the editing to better convey the intended message. It is sometimes not clear if actions are planned, executed or to be accomplished as a remaining part of a current project. The included listing of LNG events or official texts is not helpful in supporting any meaningful conclusions, also they are sometimes dated like the TEN-T ones that elapsed in 2015.

To conclude, CLIA Europe is concerned about the credibility and actual purpose of this document which provides little added value, except with the possibly positive exemption of the list of actions in the Baltic area, if correct.

We apologise for being so negative in our comments at this stage and we are very much look forward to discussing this topic further with HELCOM and its members and to contributing our industry’s knowledge and expertise.

CLIA Europe will join the HELCOM Maritime 18 meeting in Hamburg in September and we look forward to engaging and to providing positive contributions to these important developments.

Action requested

The Meeting is invited to discuss the information provided in this submission and the attachment and to act accordingly.