

Comments on Annex II in Proposal for a Regulation of the European Parliament and of the Council on the use of renewable and low-carbon fuels in maritime transport and amending Directive 2009/16/EC, COM(2021) 562, 2021/0210 (COD)

Table 1 in Annex II presents default factors for various potential maritime fuels. Regarding the liquid biofuels listed in Table 1, only existing pathways on the market today are included. However, referring to Directive (EU) 2018/2001, Annex V, several emerging biofuel pathways are listed which may be highly relevant as maritime fuels but is not included in Table 1 in Annex II. There is thus an inconsistency in Table 1 in Annex II regarding liquid biofuels and renewable fuels of non-biological origin (e-fuels), the former only including existing commercial fuels and the latter representing future emerging fuels. To be consistent and complete, also emerging liquid biofuels shall be added and included in Table 1 in Annex II. According to Directive (EU) 2018/2001, Annex V, following liquid biofuels and pathways are relevant as maritime fuels and should be included in Table 1 in Annex II:

1. Methanol from waste wood / farmed wood (thermal gasification in free-standing plants)
2. Methanol from black-liquor gasification (integrated with pulp mills)
3. Fischer-Tropsch diesel from waste wood / farmed wood (thermal gasification in free-standing plants)
4. Fischer-Tropsch diesel from black-liquor gasification (integrated with pulp mills)
5. DME from waste wood / farmed wood (thermal gasification in free-standing plants)
6. DME from black-liquor gasification (integrated with pulp mills)

In addition to the emerging biofuel pathways listed above referring to Directive (EU) 2018/2001, Annex V, biogenic methanol can be produced in pulp mills from black liquor by an extraction and purification process. This is exemplified in a new commercial production facility integrated with a pulp mill in Mönsterås, southern Sweden, own by Södra Skogsägarna (<https://www.sodra.com/en/global/Bioproducts/biomethanol/>). Thus, this existing methanol production system should also be included as maritime fuel in Table 1 in Annex II:

7. Methanol from black liquor by extraction and purification (integrated with pulp mills)

TtW data for this new commercial production system need to be complemented before adding in Annex II, Table 1.