

Carbon Regulations and Consequences

Maritime Day Åland

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23 May 2024

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- Introduction
- IMO/EU general status on GHG emissions
- EU ETS
- Fuel EU Maritime
- IMO CII
- Solutions

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Trading pattern ro-pax in the Baltic region

- 2023 traffic patterns for Passenger/Ro-Ro ships operating in the Baltic Sea and west of Sweden
- 140 unique vessels > 5000 gross ton



DNV in the Baltic+ Region

- High coverage of DNV surveyors in the Baltic+ region
- RoRo/RoPax hubs
- 400+ surveys/year on RoRo/RoPax vessels

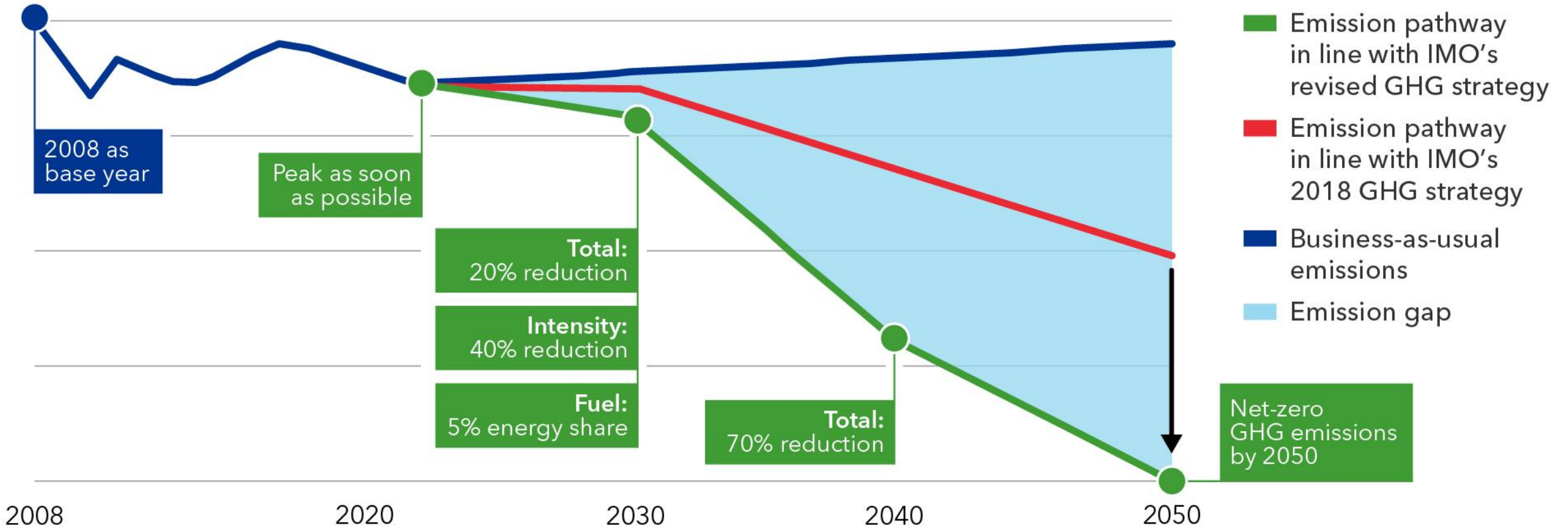


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Strengthened IMO strategy on GHG reductions (MEPC 80)

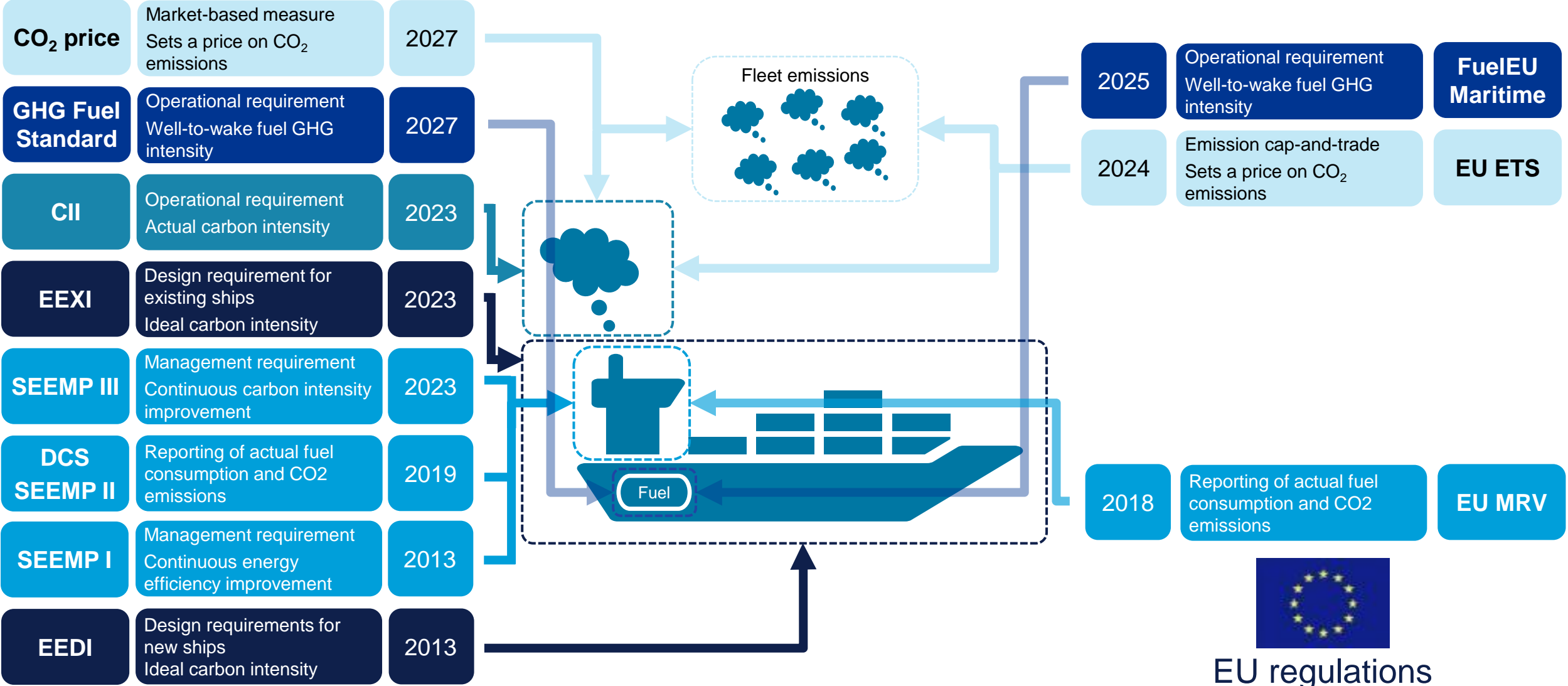
Units: GHG emissions



Total: Well-to-wake GHG emissions; **Intensity:** CO₂ emitted per transport work; **Fuel:** Uptake of zero or near-zero GHG technologies, fuels and/or energy sources

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The regulatory framework to reduce GHG emissions



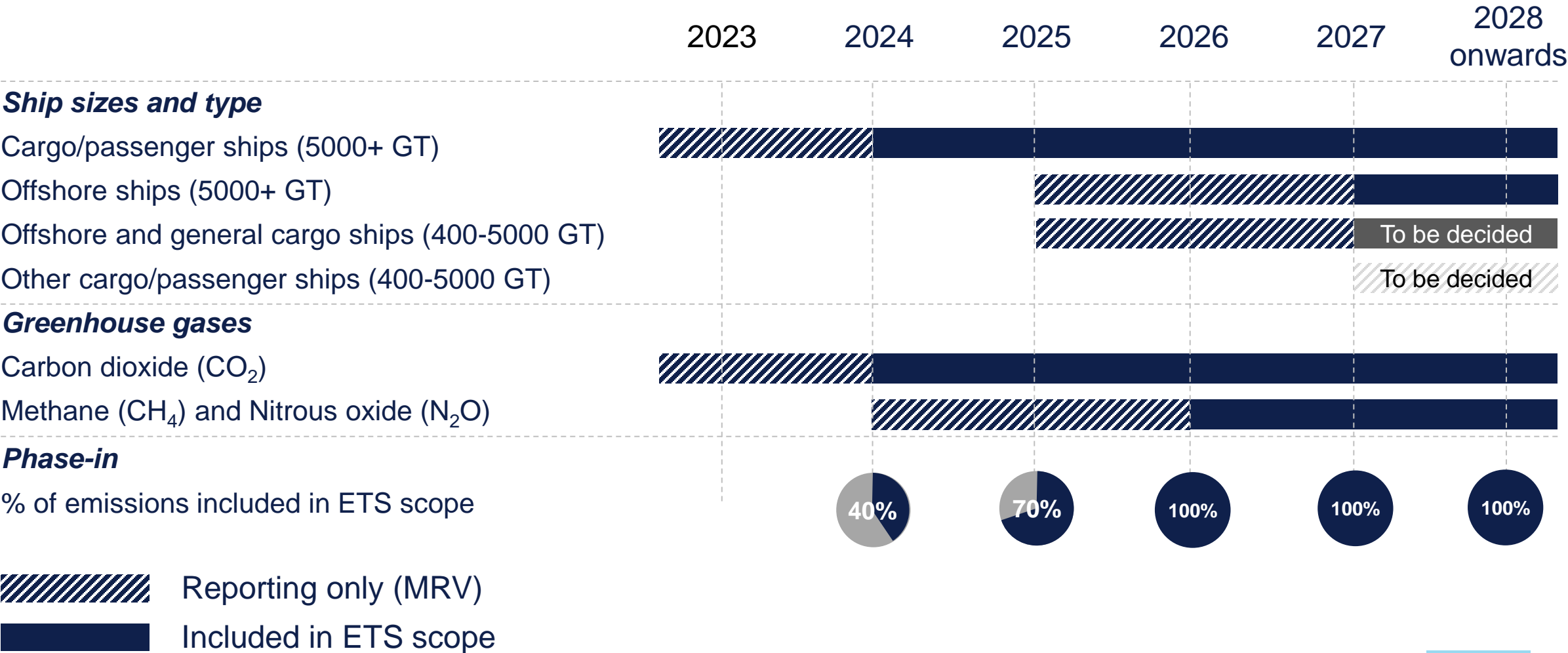
EU regulations



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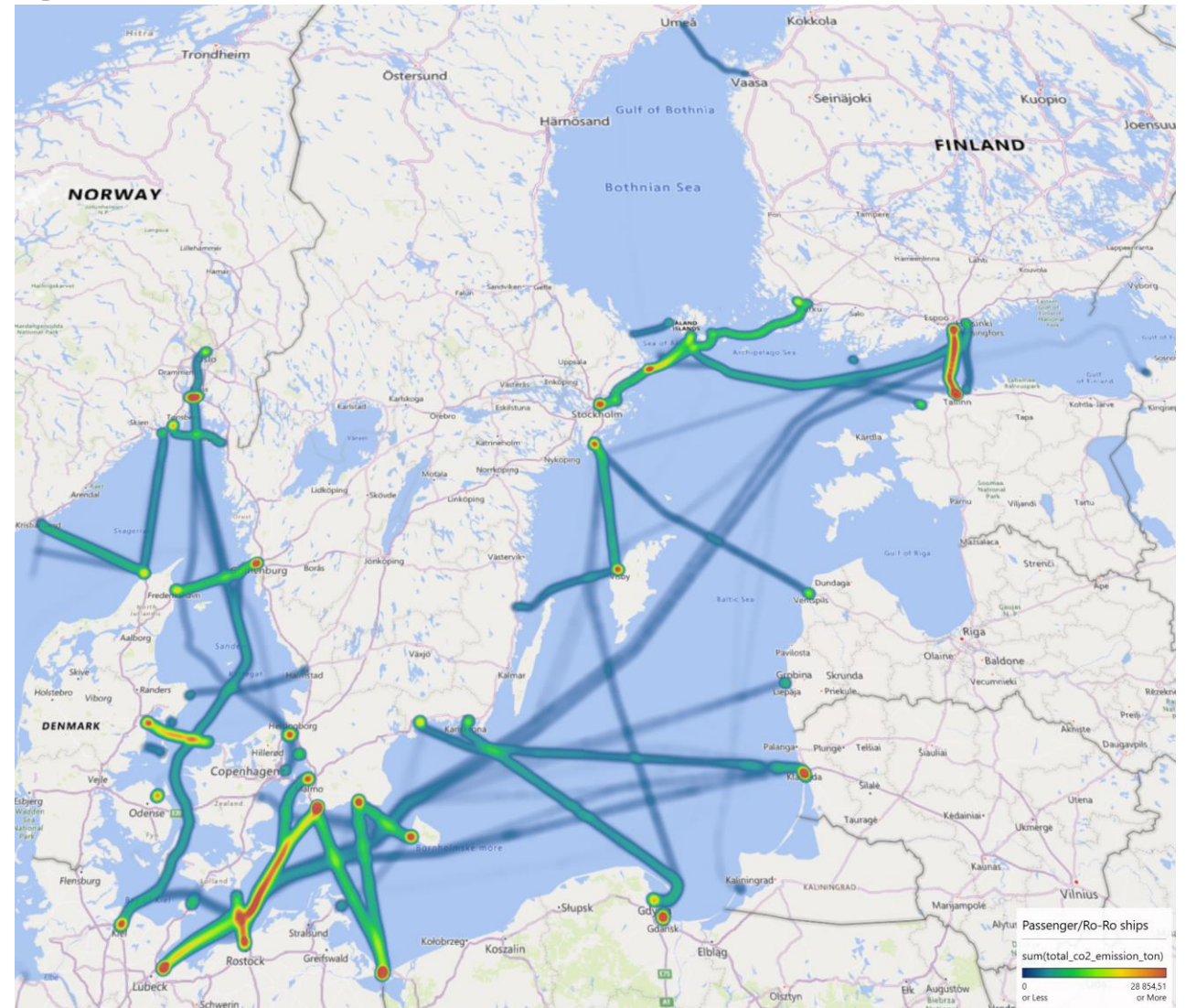
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Shipping to be included in the EU Emissions Trading System from 2024



Emissions in the Baltic region

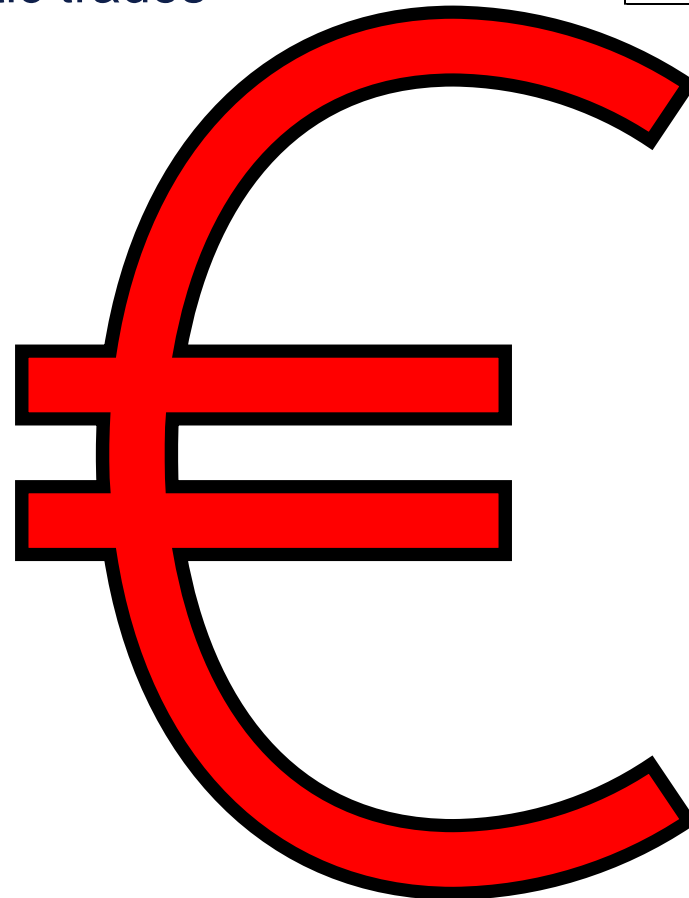
- Geographical distribution of fuel consumption for Passenger/Ro-Ro ships operating in the Baltic Sea and west of Sweden
- 140 unique vessels > 5000 gross ton
- Total fuel estimate of ~1.6 million toe
- CO₂ emission ~ 4.9 million ton



What does this mean for the industry?

- EU ETS will increase the cost of ROPAX significantly for the baltic trades

| | 2024 | 2025 | 2026 |
|------------------------------|-------------|-------------|-------------|
| ROPAX additional cost EUA@70 | 122 372 675 | 214 152 181 | 305 931 687 |
| ROPAX additional cost EUA@90 | 157 336 296 | 275 338 518 | 393 340 740 |



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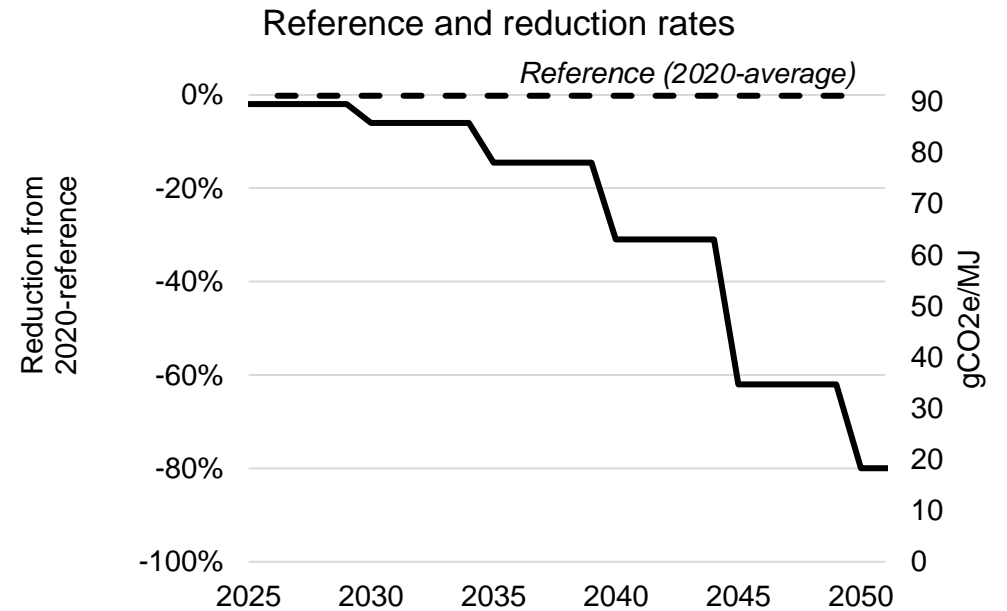
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FuelEU Maritime – requirements to lifecycle GHG intensity of energy

- Requirement to the yearly **average well-to-wake GHG intensity of energy** used on-board:

$$\text{Well to Wake GHG intensity} = \frac{gCO_{2eq}}{MJ}$$

- All ships above 5000 GT transporting passengers or cargo
- 50% of energy used on voyages between EU and non-EU ports, 100% of energy used on intra-EU voyages and when at berth
- Includes CH₄ and N₂O and electricity received, rewards for using wind power
- Compliance can be banked and pooled**, with some limitations across periods, ships and companies
- Mandatory 2% RFNBO use from 2034, if use in 2031 is less than 1%. Equivalent fuels with a similar or higher decarbonisation potential can be accepted.



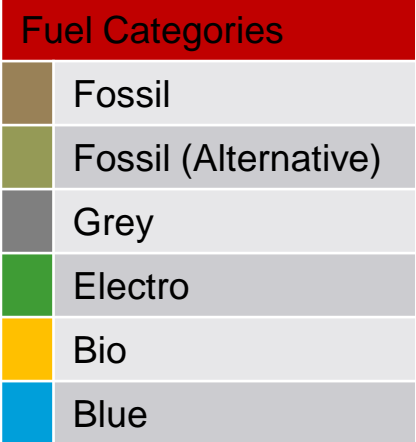
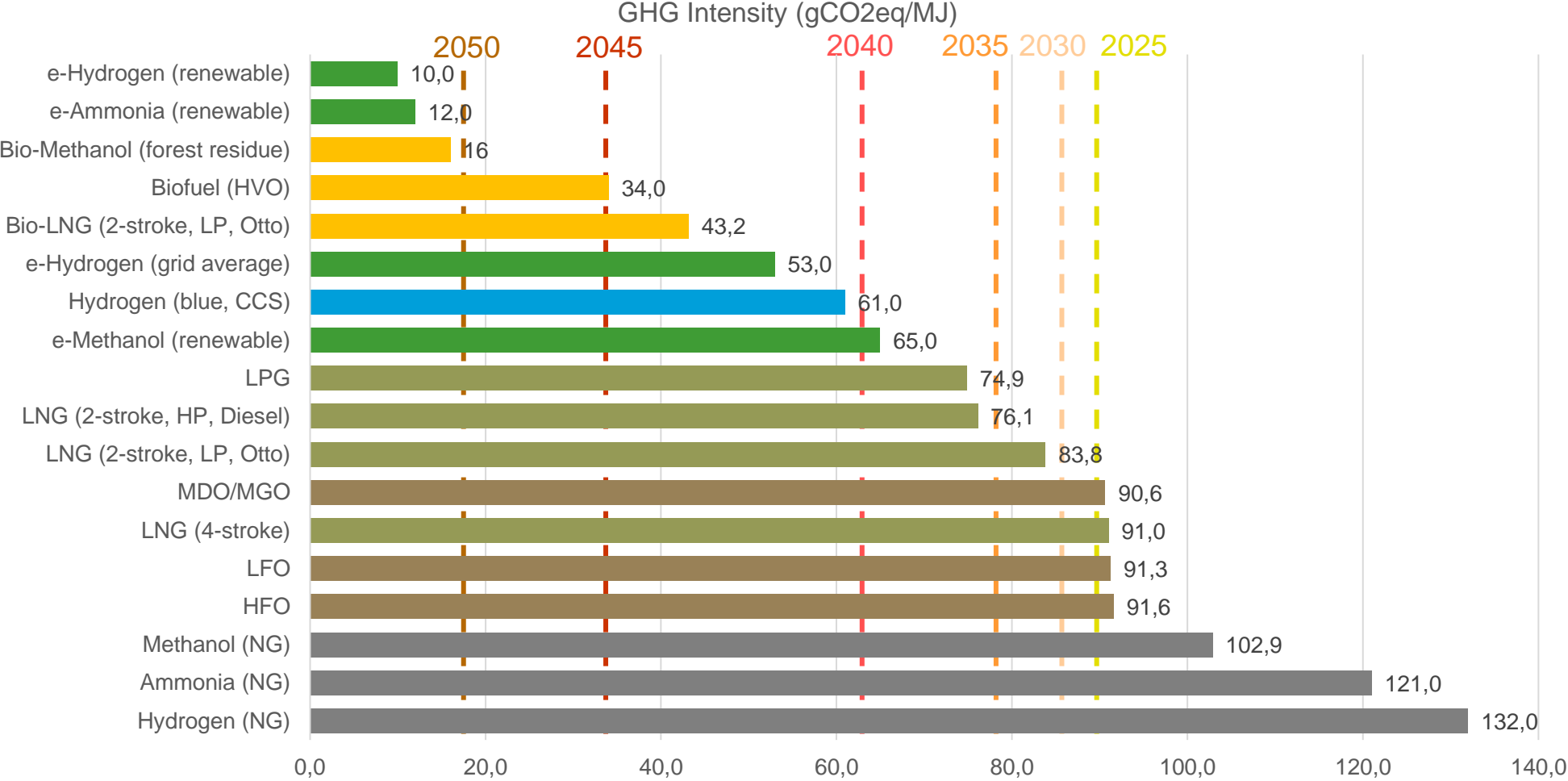
- Requirement to the **use of shore power**:

- From 1 January 2030 for **container and passenger ships** not using zero-emission technologies: **connect to shore power while at berth in TEN-T ports** for more than 2 hours

| Reduction | 2025 | 2030 | 2035 | 2040 | 2045 | 2050 |
|--|------|------|-------|------|------|------|
| Reduction (%) | 2% | 6% | 14.5% | 31% | 62% | 80% |
| Required GHG intensity (gCO _{2e} /MJ) | 89.3 | 85.7 | 77.9 | 62.9 | 34.6 | 18.2 |

Note: the above is subject to final adoption by the Parliament and Council

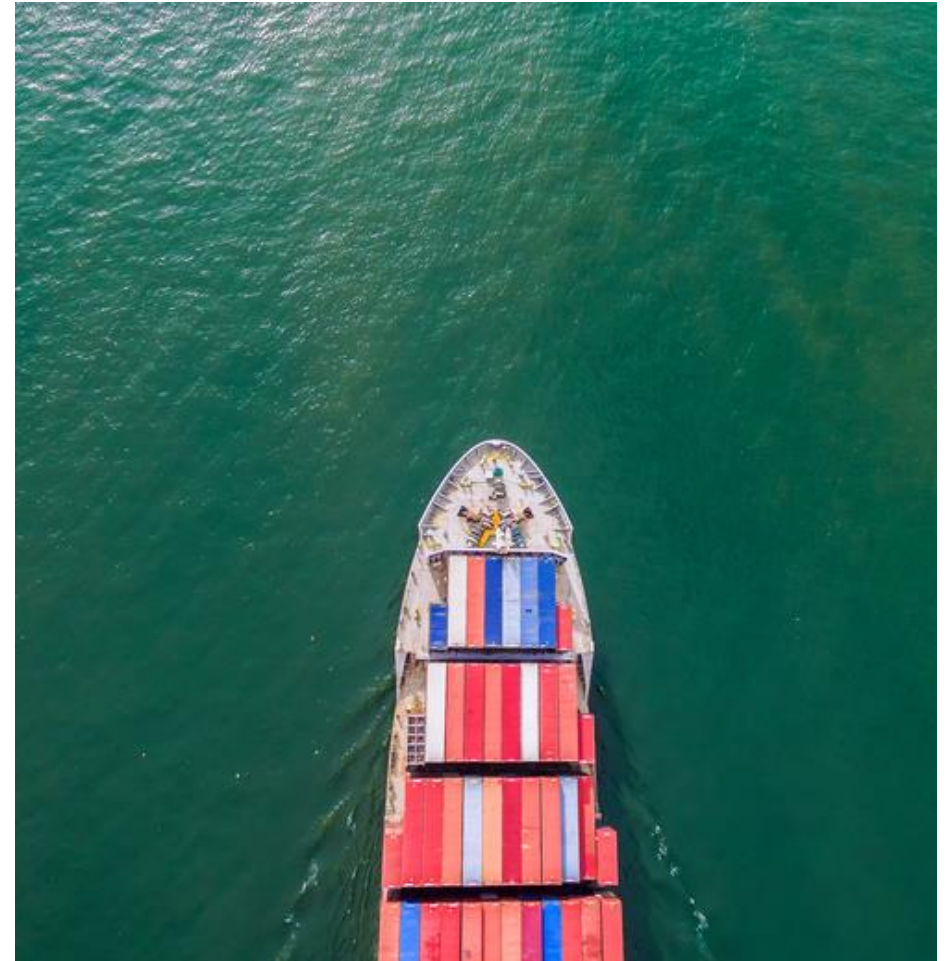
GHG Intensity limit



- Values are based on assumption and may vary once LCA is finalized.
- LNG (with high pressure 2-stroke engine) and LPG are the two fossil fuels compliant options until 2040.
- Sources: FuelEU regulation, MEPC documents, JRC default values for transport fuels

EU ETS and FuelEU Maritime compliance options

| Option | EU ETS | FuelEU Maritime |
|---|--------|-----------------|
| Fossil LNG/LPG | + | + |
| Sustainable biofuels | ++ | ++ |
| Renewable fuels of non-biological origin (RFNBO), recycled carbon fuels (RCF) (e.g. e-methanol) | ++ | ++ |
| Shore power | ++ | ++ |
| Wind assisted propulsion | ++ | + |
| Energy efficiency | ++ | N/A |
| Onboard carbon capture and storage | ++ | ? |
| Compliance balance (borrow, bank, pool) | N/A | + |
| Pay penalty | N/A | O |



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- **IMO CII**
- Solutions

CII - Carbon Intensity Indicator rating

Scope:

- Cargo, ro-pax and cruise ships above 5000 GT
- GT-based for vehicle carriers

Requirements:

- Every year from 2023: Annually calculate and report Carbon Intensity Indicator and rating A to E.
- Each ship needs to achieve rating C or better

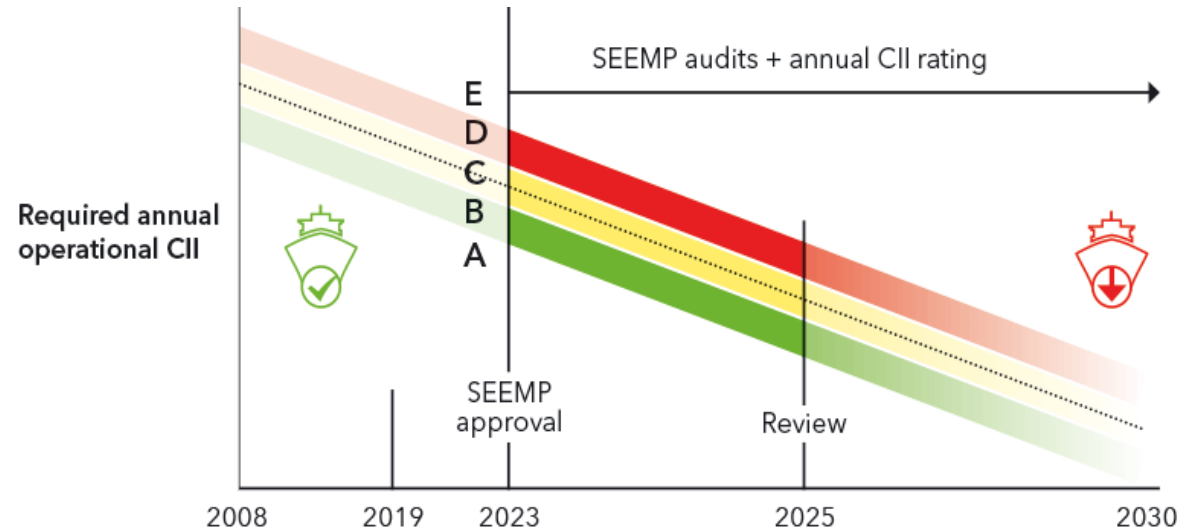
Enforcement:

- If rating D for 3 consecutive years or rating E: develop and implement an approved corrective action plan as part of SEEMP III to achieve rating C or better
- Annual Statement of Compliance issued

Review to be conducted by 1 January 2026, e.g.:

- Reduction factors for 2027-2030
- Strengthened corrective actions
- Need for enhancement of the enforcement mechanism

$$\text{CII} = \frac{\text{Annual fuel consumption} \cdot \text{CO}_2 \text{ factor}}{\text{Annual distance travelled} \cdot \text{Capacity (DWT or GT)}} \cdot \text{Correction factors}$$



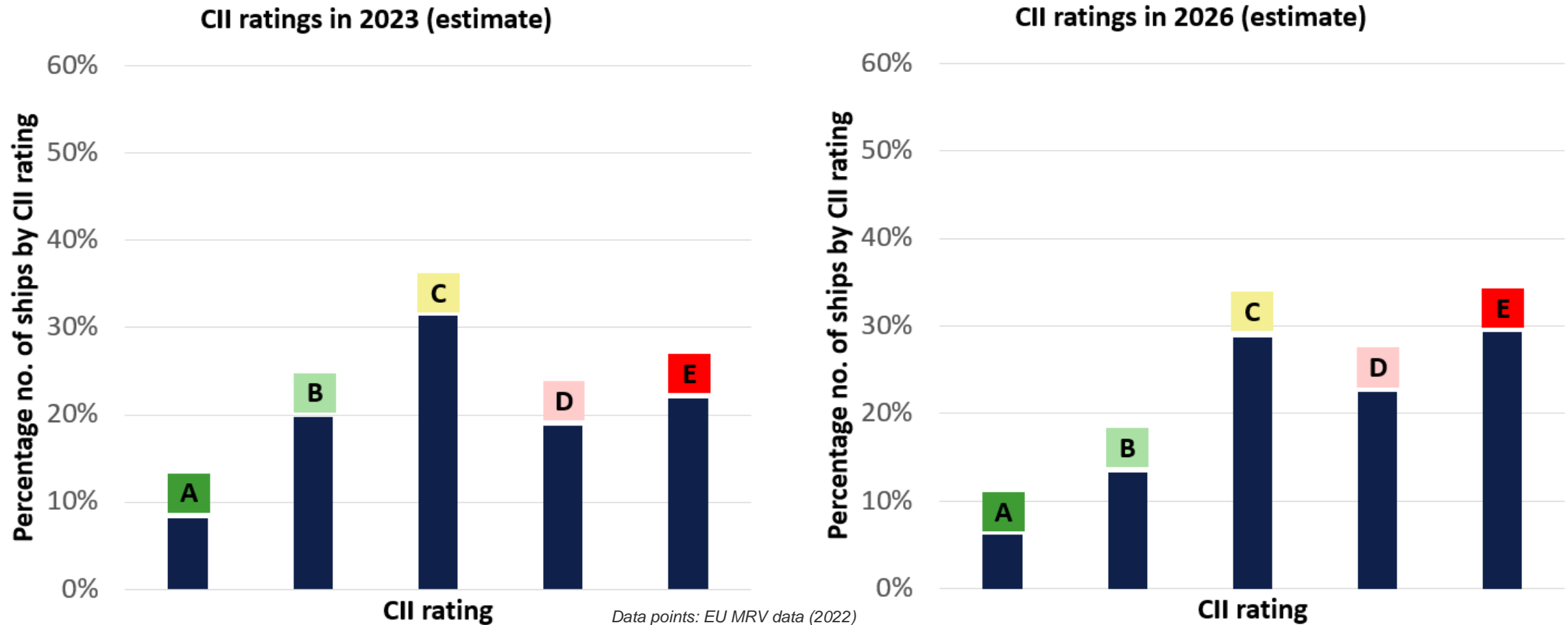
| Year | Reduction from 2019 ref. (mid-point of C-rating band) |
|-----------|---|
| 2023 | 5 % |
| 2024 | 7 % |
| 2025 | 9 % |
| 2026 | 11 % |
| 2027-2030 | To be decided |



Carbon Intensity Indicator (CII) review

- **Phased approach** agreed
 - **Data-gathering** phase until MEPC 82, autumn 2024
 - **Data analysis and potential amendments** to the CII by MEPC 83, summer 2025
- **No immediate changes to the CII framework**
 - This includes correction factors and voyage adjustments
 - **Potential amendments in 2025** include:
 - **CII reduction requirements** from 2026 to 2030 to be aligned with the revised GHG Strategy ambitions
 - **Correction factors** and/or additional metrics
 - Revised **enforcement** mechanism
 - Application of **LCA guidelines**

Percentage of ships in different categories based on 2022 data.



Data points: EU MRV data (2022)

Reference line and rating boundaries: MEPC.353(78)

Reduction factors: MEPC 76/WP.4

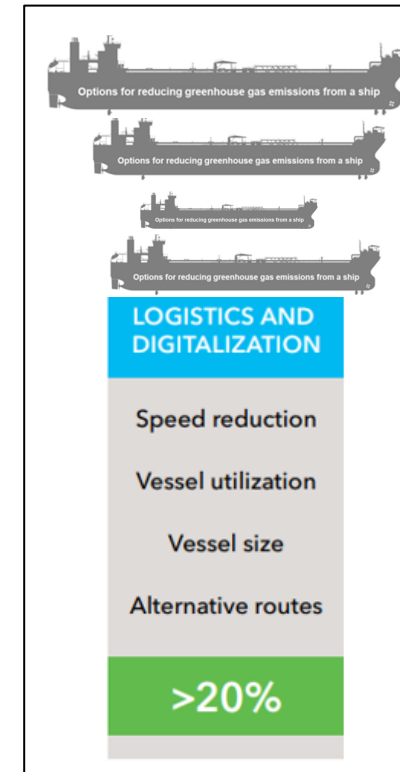
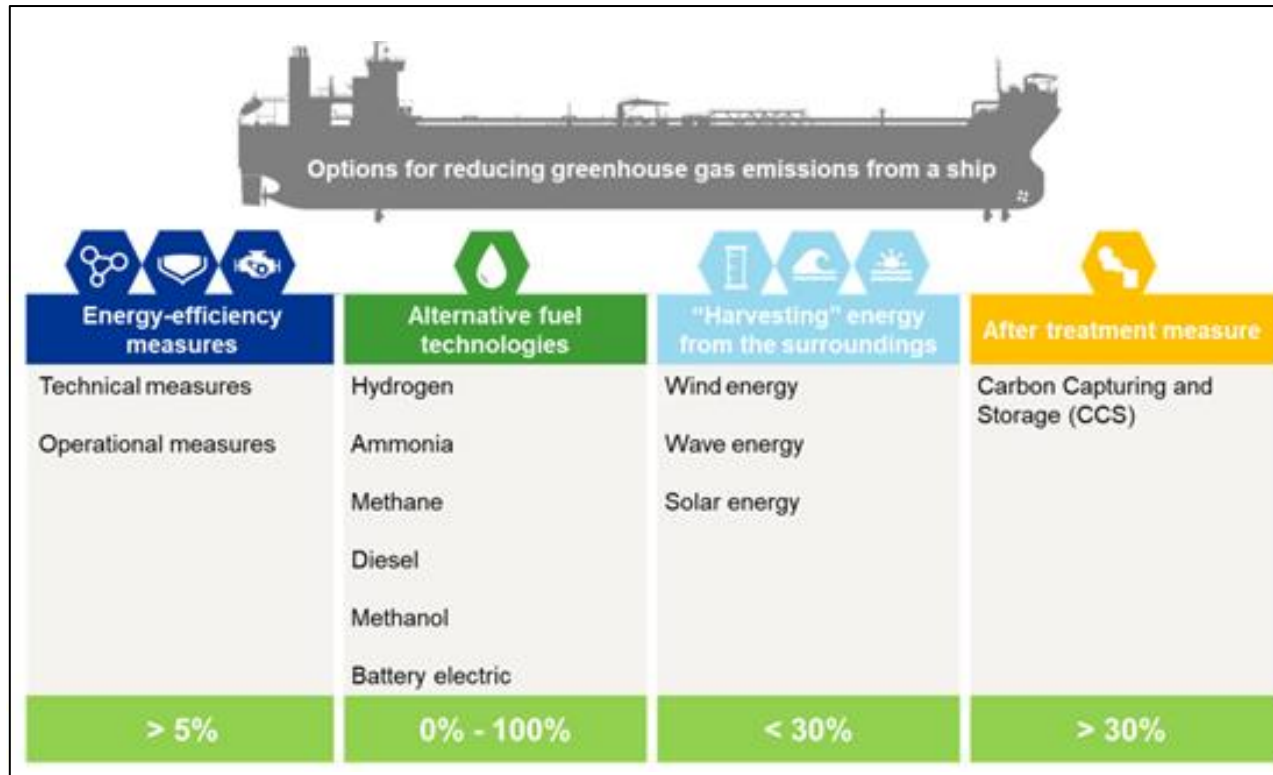
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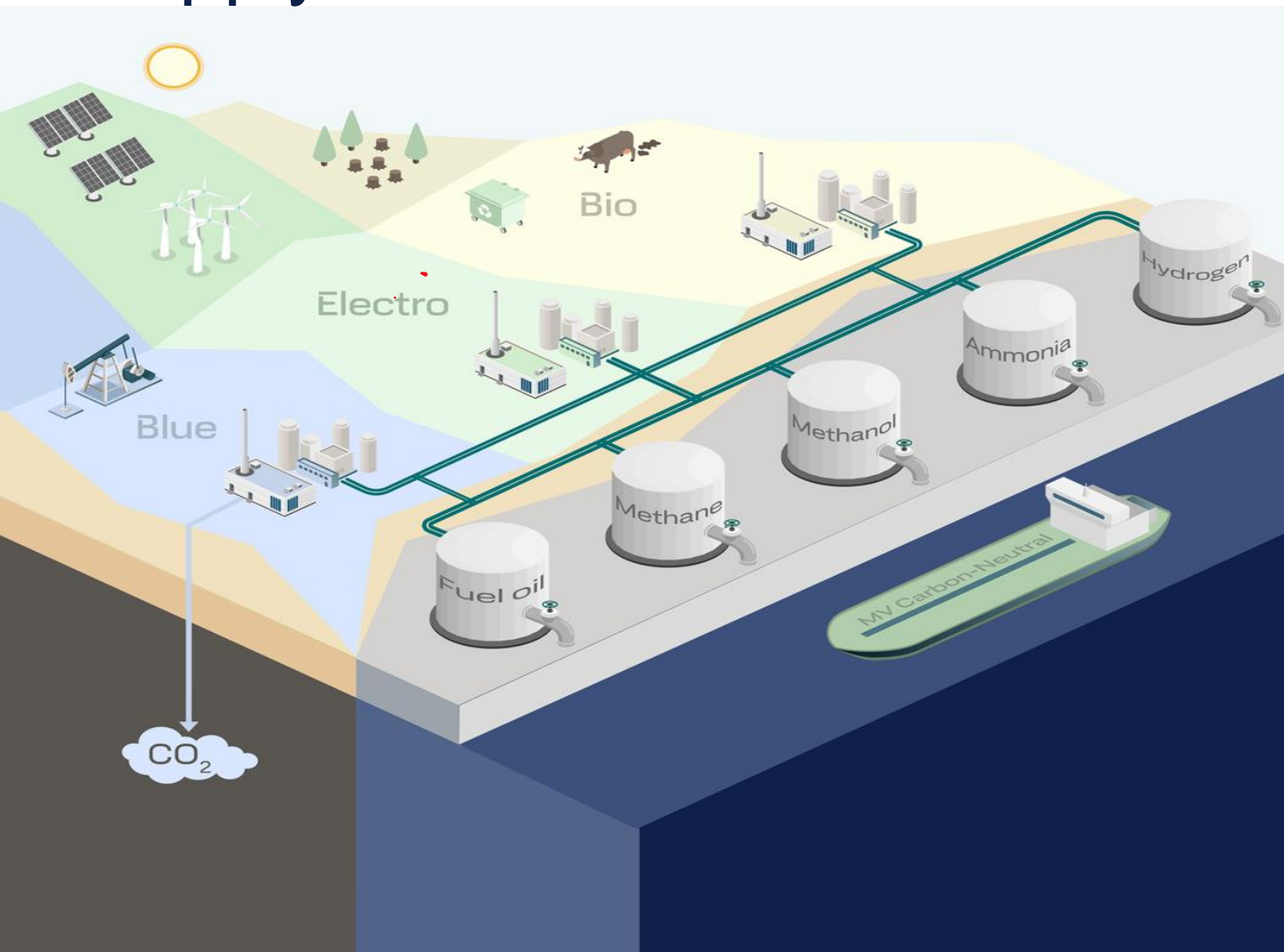
Decarbonization options for shipping

Significant **GHG reduction** can be achieved by technical and operational measures. **Up to 100%** GHG reduction can only be achieved with Alternative fuels. Barriers to implementation includes:

- Cost
- Availability and infrastructure
- Onboard storage



Shipping needs to switch to carbon-neutral energy supply chains



Sustainable biomass for biofuels

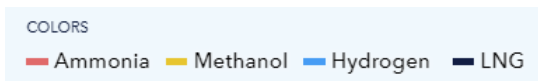
Renewable electricity for electrofuels

Sustainable carbon for carbon-based electrofuels

Large scale CCS

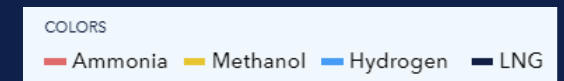
Fuel production

Status: In operation, Decided, Under discussion



Fuel bunkering

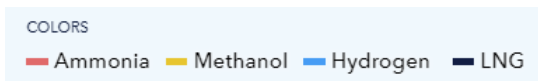
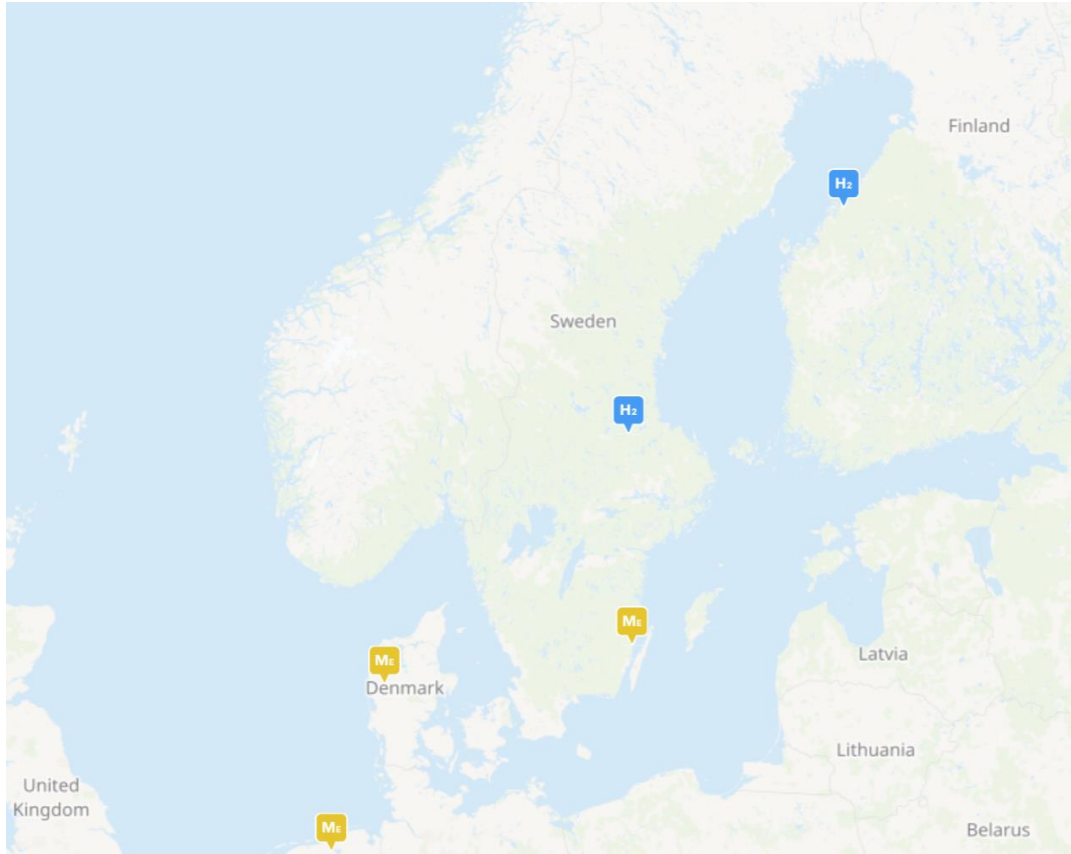
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Note that the majority of the projects presented are «under discussion». There are uncertainty regarding their realization.

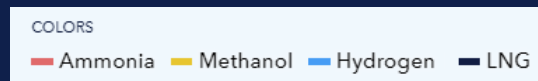
Fuel production

Status: In operation



Fuel bunkering

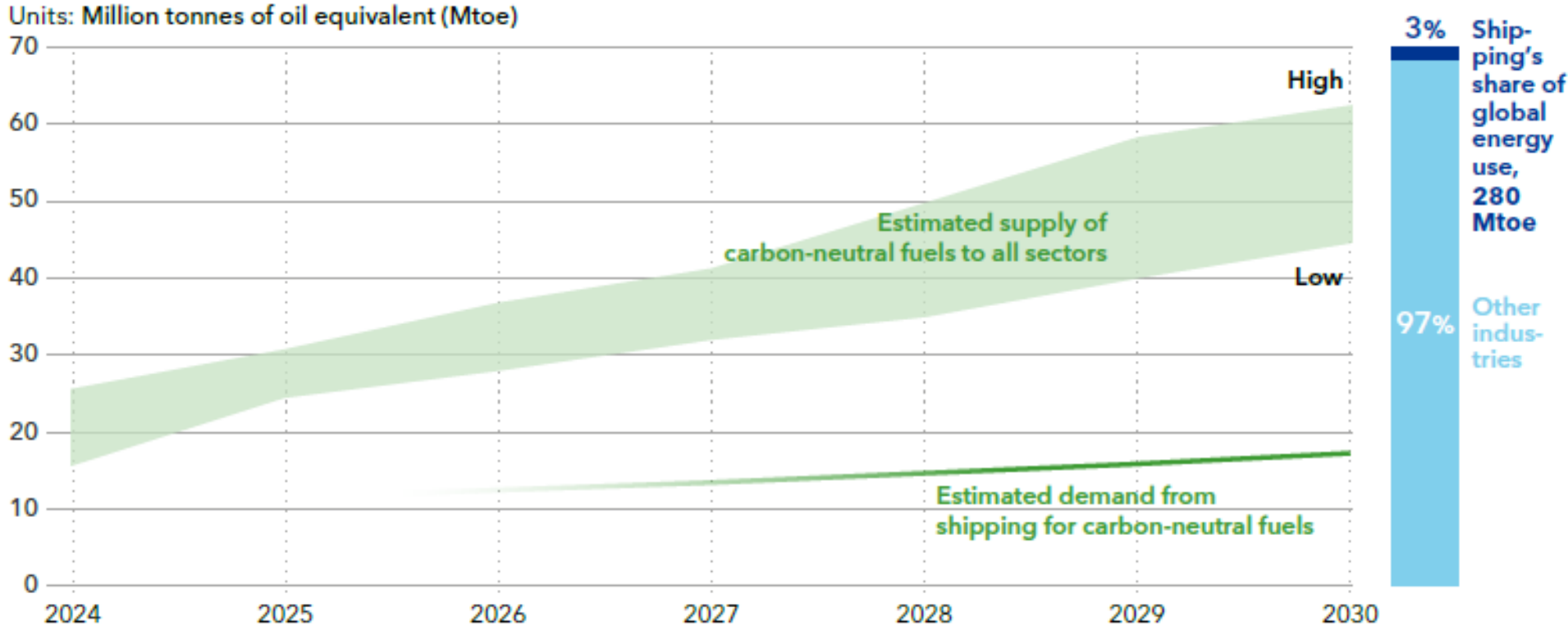
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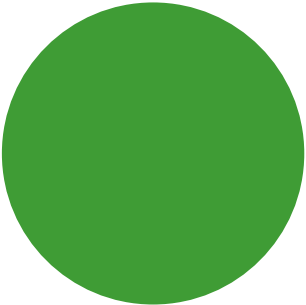
DNV Maritime Forecast 2023

FIGURE 1-4

Estimated supply of carbon-neutral fuel



Regulatory status of marine fuels

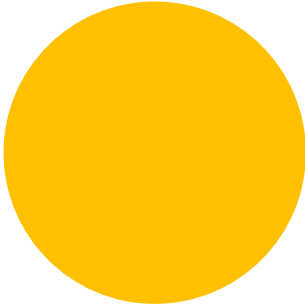


Diesel

Methane / LNG

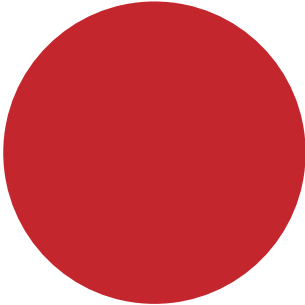
Battery-electric

Covered by maritime regulations (SOLAS, IGC code, IGF code)
Class rules in place



Methanol

Interim guidelines approved by IMO, but still Alternative Design Approach may be needed
Class rules in place



Ammonia

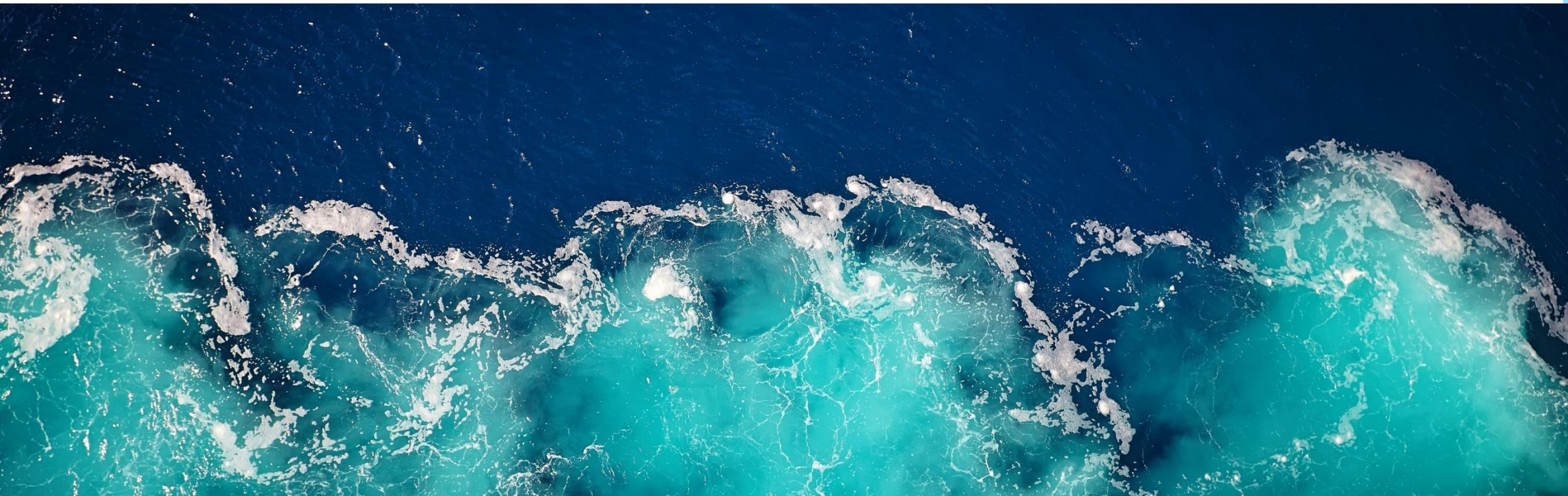
Hydrogen

Alternative Design Approach needed
DNV class rules for ammonia released in 2021



WHEN TRUST MATTERS

Economic Feasibility Study for RoPax



What we did

- This study has investigated the economic feasibility of different fuel and technology strategies for a 25 000 GT RoPax vessel in operation.
- We investigated the economic potential of three different fuel pathways (Fuel oil – baseline vessel, DF LNG and DF Methanol), and compared it to two onboard carbon capture scenarios, where the capture unit had the capacity to **capture 70% CO2 annually**.

Baseline vessel definition

| | |
|------------------------------------|--------------|
| Newbuild/in operation | In operation |
| Vessel capacity | 25 000 GT |
| Vessel type | RoPax |
| Year of build | 2005 |
| Start year of cost analysis | 2026 |
| Remaining lifetime | 25 years |

Fuel Pathways

Fuel pathway 1: MF fuel oil



Fuel pathway 2: DF LNG



Fuel pathway 3: DF Methanol*



Fuel pathway 4&5: Onboard carbon capture



Low-cost onboard CCS

Capture rate – 70%

Fuel penalty – 15%

Offloading cost – 40 USD/ton CO₂

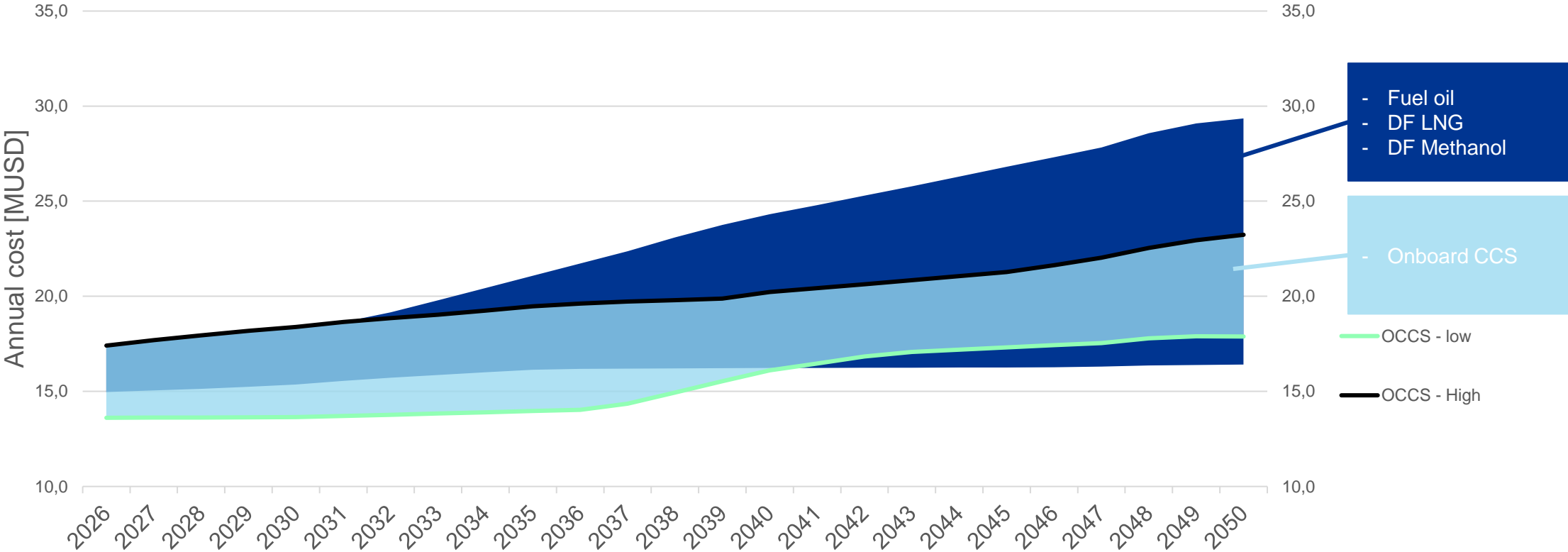
High-cost onboard CCS

Capture rate – 70%

Fuel penalty – 30%

Offloading cost – 80 USD/ton CO₂

Range of Annual cost



The range of annual cost show that the low-cost onboard CCS scenario is competitive compared to the three other fuel pathways analysed in this study.

Discharge of the captured carbon and storage capacity

- For both onboard carbon capture scenarios where 70% of the carbon dioxide was captured annually, the amount of carbon dioxide captured is between 35 000 - 40 000 tonnes CO₂
- Due to fixed routes, the captured carbon can be frequently discharged to shore, less volume is needed for onboard storage.
- We have assumed that the captured carbon will be discharged once per day
 - Between 95 – 110 tons CO₂ per day
 - CO₂ storage tank capacity: 85 -100 m³ (liquid CO₂)

Thank you very much for you attention!