CONSULTATION ON THE POSSIBLE REVISION OF DIRECTIVE 1999/32/EC RELATING TO A REDUCTION OF THE SULPHUR CONTENT OF CERTAIN LIQUID FUELS

1. PURPOSE

International maritime transport is very important for both intra-EU trade and for the import and export of goods. It contributes to the prosperity of the European regions and citizens. At the same time, the contribution of international shipping to air pollution and air quality problems in the European Union has increased significantly over the past decades, especially in coastal areas. This contrasts with important reduction of emissions from land based sources (amongst others sulphur emissions).

Annex VI of the Marine Pollution Convention 73/78 governs air pollution emitted by ships operating internationally. Provisions related to the reduction of sulphur emissions are transposed into EU law by means of the Directive 1999/32/EC related to the sulphur content of certain liquid fuels ("Directive"). This Directive requires the Commission to present to the Council and European Parliament a report on the implementation of the Directive with a particular focus on certain important issues, possibly together with a proposal for amendments, if appropriate. Several studies conducted by the Commission and the International Maritime Organisation (IMO) as well as other organisations have been providing for a solid factual basis for the review.

The Commission already had targeted consultations with several stakeholders. At present, the Commission is further extending its consultations by means of a formal public consultation process. It aims to collect the views of various stakeholders, including those directly affected by the Directive and the recent amendment to Annex VI as well as NGOs, consumers and other interested parties on possible amendments of the Directive.

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1 The International Convention for the Prevention of Pollution from ships 1973 as modified by the Protocol of 1978 (is commonly referred to as MARPOL 73/78) operates under the auspices of the IMO and contains several annexes address various forms of ship related pollution.

2 The relevant studies on this topic can be found at: http://ec.europa.eu/environment/air/transport/ships_directive.htm.
Questions relate to possible revisions that are resulting from the 2008 amendment to IMO Annex VI or for which the review has shown a need to address certain implementation issues.

It is noted that certain subject matters may not be subject to amendments of the Directives at present. The Commission Communication accompanying the possible proposals may nevertheless indicate which options could be pursued at a later stage. A key example is the designation of Emission Control Areas which require a proposal from IMO parties and a subsequent verification by the IMO against set criteria. The Commission intends to address this issue in a more comprehensive manner when reviewing the EU's air quality policies in 2013. The Commission intends to have additional public consultations on these important matters from spring 2011 onwards.

The outcome of the consultation will be taken into account in the preparation of the Impact Assessment and the review of the Directive.

Below you will find a list of questions preceded by a short background document.

2. BACKGROUND

2.1. The Context

The Commission's Communications on a "Strategy to reduce atmospheric emissions from seagoing ships"\(^3\) and the Thematic Strategy on Air Pollution ("the Strategy")\(^4\) underline the importance of reduction of emissions of sulphur dioxide (SO\(_2\)), nitrogen oxide (NO\(_x\)) and particulate matter (PM) from ships for the improvement of health and environment.

The strategy inter alia aims at significantly reducing premature deaths caused by air pollution by 2020 whilst simultaneously resolving environmental impacts such as acidification and eutrophication and associated losses in biodiversity. To achieve these objectives the strategy put forward measures to reduce emissions of, amongst others, NO\(_x\) (about 60%) and SO\(_2\) (about 80%, whilst also resulting in a significant reduction of PM emissions). These emission reductions should help Member States to attain air quality standards that have also been set in line with scientific health and environmental impact data. In practice, there remain wide-spread exceedances of existing air quality limits across the EU.

Ship emissions of SO\(_2\), NO\(_x\), and PM significantly contribute to these problems, especially in ports and in coastal areas. Projections of the business as usual scenarios for ship emissions show that these emissions in EU sea areas could be as important as emissions of SO\(_2\) and NO\(_x\) from all land-based sources combined in the EU by 2020.\(^5\)

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\(^3\) COM(2002) 595 final
\(^4\) COM(2005) 446 final
2.2. **Annex VI of the Marine Pollution Convention**

Air pollution emitted by ships operating internationally is governed by the so called Annex VI of the Marine Pollution Convention 73/78. It was adopted in 1997 and at that time included provisions establishing the Baltic Sea as a Sulphur Emission Control Area (SECA) where fuels with no more than 1.5% sulphur by mass can be used. Outside of SECAs, marine fuels could contain up to 4.5% by mass. In 2000, an amendment to Annex VI was adopted by the IMO which designated the North Sea and English Channel as an additional SECA but neither was immediately operational because of an insufficient number of ratifications by IMO Parties representing a sufficiently large proportion of world tonnage. In 2005, just after the provisions of MARPOL Annex VI entered into force, the Annex was further amended to introduce the IMO's rules on marine fuels to be used in SECAs. These new rules were nonetheless widely recognised as being insufficient to address the projected increases in environmental impacts due to shipping. Without further action sulphur dioxide (SO\textsubscript{2}) emissions from ships would continue to grow and surpass all emissions of SO\textsubscript{2} from land-based sources in the EU by 2020.

Given this background, the co-legislators called upon the Commission when adopting Directive 2005/33/EC to undertake a later review of the legal requirements on fuel sulphur content (and for marine fuels in particular).

Meanwhile and following several years of negotiation the IMO adopted a further amendment to Annex VI in October 2008 (which entered into force 1 July 2010). These new provisions in the 2008 amendment can be summarised as follows:

1. Reducing the sulphur content of all marine fuels used within SECAs from 1.5% by weight to:
   - 1.00% by 1 July 2010;
   - 0.10% by 1 January 2015;

2. Reducing the sulphur content of marine fuels used outside SECAs from 4.5% by weight to:
   - to 3.50% by 1 January 2012;
   - to 0.50% by 1 January 2020 (subject to a review in 2018 / delay until 2025).

The amended Annex VI also allows ships to use abatement equipment to reduce sulphur emissions or employ alternative fuels such as Liquefied Natural Gas (LNG) in order to comply with the requirements of sulphur limits as long as certain safety and environmental standards are followed.

The international rules should already be enforced by the majority of EU Member States who are parties to MARPOL Annex VI. However, the monitoring and reporting obligations, derived only from the Directive, refer still to the standards provided for in the Directive, which are no longer up to date.

6 The International Convention for the Prevention of Pollution from ships 1973 as modified by the Protocol of 1978 (is commonly referred to as MARPOL 73/78) operates under the auspices of the IMO and contains several annexes address various forms of ship related pollution.

7 Five Member States (Austria, Malta, Czech Republic, Slovak Republic, Hungary) are not parties to Marpol Annex VI.
Therefore, in order to ensure the coherence of the EU and international rules the current EU requirement on sulphur limit in SECAs (1.5%) should be aligned with the new IMO standards. Whilst doing so, the transposition of the global standard for the sulphur content of fuels outside of SECAs should also be considered to achieve:

- a comprehensive legal instrument comprising all standards related to sulphur content in maritime fuels;
- a more harmonized approach towards enforcement and monitoring;

At the same time, the Commission has endeavoured to carefully assess the impacts of the 2008 amendment also for the purpose of identifying possible measures that could alleviate compliance costs, particularly where these would lead to undue modal shifts or related distortion of competition. The studies commissioned by the EC and EMSA (also reviewing studies conducted by Member States) are available to the public (see references below). Whilst confirming that the benefits will largely outweigh the costs, the studies also suggest that the 2008 amendment will, at least in some cases, lead to important increases of maritime transport costs. It is also suggested that in some cases this may lead to a reduced attractiveness of short sea shipping thus possibly inducing a modal shift to land or rail transport solutions (in the absence of further measures affecting the cost of the latter modes).

2.3. Directive 1999/32/EC

The Directive establishes limits on the maximum sulphur content of gas oils, heavy fuel oil in land-based applications as well as marine fuels for which it serves as the EU legal instrument to incorporate the sulphur provisions of the MARPOL Annex VI. The Directive furthermore contains some additional fuel-specific requirements for ships calling at EU ports, obligations related to the use of fuels covered by the Directive, and the placing on the market of certain fuels (e.g. marine gas oils). The Directive does not contain provisions to regulate ship emissions of NOx or PM.

The latest alignment of the Directive with the IMO rules dates back to 2005.\(^8\) However, it did not incorporate the strictest sulphur limits provided for in the amendment of the MARPOL Annex VI as they had yet to enter into force at that time.\(^9\) Also because the rules introduced by the 2005 amendment were widely considered insufficient to address the environmental impacts of shipping, the co-legislators called upon the Commission to undertake the present review of the legal requirements on fuel sulphur content (and for marine fuels in particular).

Article 7(2) of Directive 1999/32/EC requests the Commission to submit a report to the European Parliament and to the Council by 2008 on the basis, \textit{inter alia}, of annual reports submitted by Member States pursuant to Article 7.1 of the Directive (relating to the results of the sampling, analysis and inspections carried out); observed trends in air quality and acidification, fuel costs and modal shift; progress in reducing emissions of sulphur oxides from ships through IMO mechanisms following Community initiatives in this regard; a new cost-effectiveness analysis, including direct and indirect environmental benefits, of the use of fuel with a sulphur level not exceeding 1.5% and of

\(^9\) Available at: \url{http://www.imo.org/includes/blastDataOnly.asp/data_id%3D23760/176%2858%29.pdf}.
possible further emission reduction measures; and the implementation of Article 4c relating to trials and use of new emission abatement technologies.

Article 7(2) further requests the Commission to particularly consider the designation of additional SO\textsubscript{x} Emission Control Areas; the reduction of sulphur limits for marine fuel used in SECAs down to 0.5 \%; alternative or complementary measures to reduce air pollution from ships; as well as the use of economic instruments as alternative or complementary measures.

2.4. **Alignment with the revised ISO standards**

Several of the ISO standards relating to marine fuel quality and sulphur measurement methods to which the Directive refers have been revised since the Directive was last amended in 2005. The relevant references in the Directive should be aligned accordingly.

2.5. **Monitoring of the quality of fuel**

The analyses of fuel samples undertaken by European Maritime Safety Agency (EMSA) showed that the degree of compliance by ship operators with the various marine fuel sulphur limits is insufficient, in particular:

- the monthly degree of non-compliance of SECA fuels in 2008 ranged from 4.1\% to 9.2\% of samples tested,
- the monthly amount of "off-spec" samples of marine gas oils in 2008 varied between 19.5\% and 25.5\%;
- a majority of fuel samples for passenger ships calling at EU ports (except for France and parts of Spain) contained sulphur in excess of the allowed limit (1.5\%).

Moreover, the format and content of Member States' reports on the sulphur content of fuels submitted to the Commission vary significantly, which makes the assessment and the comparison of the reports difficult. Few reports distinguish between sampling and results related to fuels for marine use and similar fuels used in land based installations. Also the sampling frequency and the number of samples taken are very low in the EU.

Therefore, harmonisation of sampling frequency and standardisation of reporting should be considered.

3. **Practical information**

The consultation is being launched only in an electronic form via the interactive policy-making tool. Interested parties are invited to send their comments, suggestions and replies to the questionnaire to the Commission by 05/01/2011 at the latest.

Unless an explicit request is made for confidential treatment, contributions will be treated as documents that the Commission can make public.

Please note that this document has been drafted for information and consultation purposes only. It has not been adopted or in any way approved by the European Commission and should not be regarded as representing the view of the Commission. It does not prejudice, or constitute the announcement of any position on the part of the Commission on the issues covered.
4. **IMPORTANT ADVICES FOR FILLING-IN THE QUESTIONNAIRE**

The online questionnaire is structured as follows:

- Respondent information
- Questions related to the sulphur content of marine fuels
- Improvements to the directive and simplifications
- Future policy on ship emissions
- Fuels used on land

**Please be informed that if interrupted or left 90 minutes inactive, your contribution will not be saved.**

Even though the consultation is open during 8 weeks, we would encourage stakeholders to respond as soon as possible in order to help the ongoing impact assessment.

Proposed practical steps for filling-in the questionnaire:

- Questions are either compulsory or optional. If any of the compulsory fields have not been filled in, the system will not allow you to submit the questionnaire but will redirect you to the incomplete answer and give you an opportunity to correct it. An error message will appear in a purple/red colour under the question in which a problem occurred.

- **Please note that you should not use the ‘Back’ button** in the upper left-hand corner of the screen of your browser to navigate the online questionnaire, because this will lead to a loss of all the data that you have already inserted. For navigation, **you should use the buttons ‘Next’ and ‘Previous’ at the bottom of the questionnaire page instead.**

- When you successfully submit the questionnaire, a confirmation message will appear on your screen and you can print your answers.

Further background information as well as relevant studies on this topic can be found at: [http://ec.europa.eu/environment/air/transport/ships_directive.htm](http://ec.europa.eu/environment/air/transport/ships_directive.htm)

1. **THE TEXT OF MARPOL ANNEX VI INCLUDING THE 2008 AMENDMENT CAN BE FOUND AT:**

   [HTTP://WWW.IMO.ORG/INCLUDES/BLASTDATAONLY.ASP/DATA_ID%3D23760/176%2858%29.PDF](HTTP://WWW.IMO.ORG/INCLUDES/BLASTDATAONLY.ASP/DATA_ID%3D23760/176%2858%29.PDF)
**RESPONDENT INFORMATION**

1. I speak on behalf of *(compulsory)*

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2. Please, indicate in which sector(s) you are engaged: *(compulsory)*

**Administrations and other institutions**

- Port authority
- Maritime administration
- Environmental administration
- Other public authority

**Land operators**

- Ship brokers and agents
- Large producers/retailers
- Shippers/receivers
- Freight forwarders/logistic services
- Rail/truck operators
- An equipment manufacturer
- A shipyard
- Exporting/importing agents
- Other

**Ship owners and managers**

- Ship owner
- Ship operator
- Other

**Other**

- An NGO representing Shipping industry or Ship owners
- An environmental NGO
- Shortsea Promotion Centre
- A company involved in production or distribution of ship fuel
2. **BACKGROUND INFORMATION ABOUT THIS PARTICULAR ISSUE**

Which of the following statements is, in your view, most appropriate:

(a) I know the sector and the legislation related to air pollution from ships.
(b) I know of the sector, but not of the legislation on air pollution from ships.
(c) I know little of the sector, but am aware of the legislation on air pollution from ships.
(d) I don't really know the sector but I am interested in transport issues in general.
(e) I don't really know the sector but I am interested in environmental issues in general.
(f) Any other (please address relevant condition).

3. **SULPHUR CONTENT OF MARINE FUELS/SULPHUR EMISSIONS FROM SHIPS**

*Alignment with IMO*

3.1. **Sulphur content of fuels used in SECAs**

The 2008 amendment to MARPOL Annex VI has introduced a reduction of fuel sulphur limits for fuels used in SECAs from 1.5% to 1.00% (already in force since 1 July 2010) and to 0.10% from 1 January 2015. The current text of the Directive still contains a requirement to use fuel not exceeding 1.5% sulphur.

Ships travelling to or from a port in a State that is Party to MARPOL Annex VI and any ship registered in a country that is a Party to MARPOL Annex VI (covering 85% of world tonnage) will need to comply with the new fuel standard. Therefore, most of the ships are already covered by the new fuel standard. However, some ships operating in the EU SECAs may not be bound by the new stricter fuel standard, in particular those registered in a Member State which is not Party to MARPOL Annex VI and is travelling to or from a port in a State that is not bound by the MARPOL Annex VI.

The choice is to do nothing, in which case the discrepancy in standards will continue, or to align the Directive with MARPOL Annex VI.

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10 Austria, Czech Republic, Hungary, Malta, Slovak Republic.
Should the Directive be aligned with Annex VI MARPOL? [more than one answer can be selected]

(a) Yes, because EU law should be consistent with international law.
(b) Yes, because it would facilitate enforcement and therefore promote compliance.
(c) Yes, whilst ensuring that economic incentives can be deployed during a transitional period to assist the sectors most impacted.
(d) No, because Annex VI is binding anyway the majority of Member States and ship passing the SECAs.
(e) No opinion.
(f) Other. [Add box with free text of max 500 characters]

3.2. **Sulphur content of fuels used outside of SECAs**

MARPOL Annex VI establishes fuel sulphur limits for fuels used outside of SECAs ("global standard") whilst the Directive 1999/32/EC currently only implements the fuel sulphur requirements in SECAs. Including the global standard in the Directive would bring together all applicable marine fuel standards in one legal text.

Should the global fuel sulphur standard also be considered for inclusion in EU law in an identical manner to the requirements of MARPOL Annex VI?

(a) Yes.
(b) No.
(c) No opinion.

3.3. **Abatement technologies that are equivalent to using low sulphur fuels**

MARPOL Annex VI permits the use of abatement technologies to deliver at least the same environmental performance as low sulphur fuels, provided that certain safety and environmental standards are complied with. The EU Directive only permits this possibility on a short-term trial basis whilst enabling the approval of new abatement technologies through comitology procedure.

Should the EU provisions on the use of abatement technologies be harmonized with Regulation 4 of MARPOL Annex VI?

(a) Yes.
(b) Yes, but additional safeguards to those already developed by the IMO may be needed to ensure that abatement techniques do not cause damage to health, safety or environment.
(c) No.
3.4. Use of economic incentives

The new fuel standards established by the 2008 amendment to MARPOL Annex VI impact differently on shipping and industry, depending on whether a country is bordering an existing SECA or not. The granting of economic incentives, which might take various forms, may help to accelerate the placing on the market of innovative solutions and would mitigate the associated cost increase for those most affected. For example, and albeit certain conditions apply, present EU law authorises shipping companies to receive state aid (limited to a certain share of the total extra net costs related to the acquisition of the equipment) for the acquisition of new ships or for retrofitting operations aimed at the early adaptation to the new environmental standards.

Should the measures that will be allowed to mitigate the cost of new requirements be clarified when launching the proposal to include the IMO rules in EU law?

(a) Yes.
(b) No.
(c) No opinion.

3.5. Extension of Emission Control Areas (ECAs)

MARPOL Annex VI enables Parties to designate Emissions Control Areas, provided one or several Parties bordering such an ECA submit a proposal to that extent and the proposal complies with the agreed criteria as contained in the MARPOL Annex VI. Concerning the EU the Baltic Sea, the North Sea and the English Channels have been designated as SOx Emissions Control Areas. Extending Emission Control Areas beyond the present EU SECAs could yield important additional reductions of emissions from shipping and associated health and environmental impacts whilst also create an improved level playing field for operators.

Should the extension of additional ECAs be endeavoured at the International Maritime Organisation by EU Parties and ultimately be considered (at a later stage) in EU law?

(a) Yes.
(b) No.
(c) No opinion.

3.6. Possible solutions for reducing the compliance costs

In addition to providing easier access to the abatement technologies other possible solutions that could mitigate the costs of complying with the stricter sulphur limits are being studied.
Which of the following measures would you consider important for the Commission to further pursue? [more than one answer can be selected]

(a) Support research, development and uptake of alternative abatement technologies ensuring equivalent effect.

(b) Develop adequate infrastructures to support the use of low emissions technologies in EU ports.

(c) Develop adequate infrastructures to continue promoting short sea shipping.

(d) Other measures.

[Add box with free text of max 1000 characters]

(e) None.

(f) No opinion.

3.7. **Dispute settlement**

In case the result of the analysis of the fuel sample raises doubts on whether the sulphur content of the fuel indeed complies with the legal limits, the Directive refers to the arbitration method ISO 14596. For the statistical interpretation of the verification of the sulphur content of the gas oils the Directive refers to ISO standard 4259 (1992).


Should the provisions related to dispute settlement and verification in Directive 1999/32/EC be replaced by the IMO circular?

(a) Yes.

(b) No.

(c) No opinion.

**Alignment with ISO**

3.8. **Changes to the definition of distillate marine fuels**

International standard ISO 8217 has been changed in 2010. Directive 1999/32/EC contains definitions of marine diesel oil and marine gas oil which refer to ISO 8217 before the change.

Should the definitions in the Directive be amended as to be consistent with the new standard?

(a) Yes.

(b) No.
3.9. Fuel Quality parameters other than sulphur content

International standard ISO 8217 recommends values for various fuel quality parameters besides sulphur (e.g. density, viscosity, solid contents such as "catalytic fines"). These parameters are important for the correct operation of ships' engines or for worker protection.

Requirements to reduce the sulphur level of fuel may indirectly affect these parameters due to the blending of different fuel qualities leading to increased risks for engine failure for example. The Directive 1999/32/EC currently only has a limited reference to the non-sulphur parameters in ISO 8217 to differentiate between marine gas oil and marine diesel oil.

Should additional requirements on non-sulphur fuel parameters be included in Directive 1999/32/EC by reference to ISO 8217?

(a) Yes.
(b) No.
(c) No opinion.

3.10. Updating the methods to measure the sulphur content of fuels

Several international standards used for measuring the sulphur content of fuels have been updated since the last amendment of the Directive in 2005 (e.g. the ISO standard 4259 and the ISO method 8754).

Should the methods in the Directive be adapted to technical progress and aligned with the latest ISO publications?

(a) Yes.
(b) No.
(c) No opinion.

Improving enforcement

3.11. Harmonised enforcement regime

The inclusion of the IMO's fuel sulphur standards in EU legislation has the objective to help ensure effective and harmonized enforcement in EU waters and ports because the EU has powerful compliance mechanisms.

Which statement best reflects your opinion? [more than one answer can be selected]

(a) Harmonized enforcement is important as different approaches to enforcement in different countries could affect the competitive position of ports.
(b) Effective enforcement would help deliver the intended environmental improvements of lower sulphur marine fuels.

(c) Current enforcement practices ensure the effective control of the legislation.

(d) No opinion.

3.12. Harmonizing and improving sampling

The number of fuel samples taken and tested by competent authorities as reported by themselves leads to the conclusion that in some cases sampling only takes place in 1 out of every 1000 ships. That seems insufficient to establish the degree of compliance with the fuel sulphur requirements of the Directive (or of Annex VI).

Which statement best reflects your opinion?

(a) Guidelines developed at EU level should assist the Member States in fulfilling their fuel sulphur monitoring and reporting obligations.

(b) Harmonised and binding rules should be established in respect of fuel sulphur monitoring and sampling.

(c) No action needed as the current monitoring and sampling is sufficient.

(d) No opinion.

3.13. Responsibility to comply for fuel suppliers

The IMO requirements relate to the use of certain fuels which means that remedies for the sale of non-compliant fuel are left to the fuel supplier and fuel purchaser to decide between themselves. Incorporation of the fuel sulphur standards in EU legislation would allow the requirement on use to be complemented with an additional requirement on placing on the market as is the case now for marine gas oil. As such, companies selling fuel to ships in EU ports would also have an obligation to deliver fuel that complies with the relevant fuel sulphur standards which could be checked by relevant Member State authorities.

Which of the following statements best reflects your opinion?

(e) It should be the responsibility of the ship operator to ensure that it uses fuel of the correct quality.

(f) The fuel supplier should also have an obligation to provide fuel of the correct quality.

(g) No opinion.

Clarification of existing requirements
3.14. **Register of suppliers**

Member States are required to maintain a register of local suppliers of marine fuel. However, this register is not always publicly available.

Would it be beneficial if the list of fuel suppliers is made public by the national or local administrations?

(a) Yes.
(b) No.
(c) No opinion.

3.15. **Passenger ships visiting EU ports**

Passenger ships operating outside of a SECA but on regular services to or from EU ports are required to use marine fuels with a maximum permitted sulphur content of 1.5%. This corresponded to the previous requirements of MARPOL Annex VI in respect of fuels to be used in SECAs. However, with the Amendment to MARPOL Annex VI, today the sulphur content of marine fuels is limited to 1.00% and it will further reduce to 0.10% in 2015.

Should the new SECA standards also be applied to passenger ships visiting Union ports outside SECA areas?

(a) Yes, further reductions of air pollution in EU sea areas outside SECAs are needed.
(b) The fuel sulphur limits for passenger ships and cruise ships operating outside of SECAs should be aligned now with MARPOL Annex VI and the "global fuel sulphur standard" of 0.5% entering into force in 2020.
(c) No, the fuel sulphur limits for passenger ships operating outside of SECAs constitute the right balance between benefits and costs and should not be changed until the IMO's global fuel sulphur limit enters into force in 2020.
(d) No, even the current sulphur limit should be deleted.
(e) No opinion.

3.16. **Cruise ships visiting Union ports**

Closely linked to the passenger ships visiting Union ports are cruise ships visiting Union ports. This requirement can also apply to cruise ships, provided that they are operating on a regular time schedule. Based on questions received, it seems that the latter condition sometimes gives rise to different interpretations.

Should in your opinion the concept of "regular service" be clarified?

(a) Yes.
(b) No.
(c) Cruise ships should always be excluded, regardless of whether operating on a regular service.
(d) Cruise ships should always be included, regardless of whether operating on a regular service.

(e) No opinion.

3.17. Clarification of the meaning of port area

The Directive 1999/32/EC has specific requirements concerning ships at berth in EU ports. At berth is defined as securely moored or anchored in an EU port.

Is there a need to add a definition of the area covered by an EU port?

(a) Yes.

(b) No.

(c) No opinion.