



## **FEPORT Position Paper on the EU Commission proposal for a revised Renewable Energy Directive (RED III)**

### **Introduction**

FEPORT is the European association which represents the interests of 1225 private companies and terminals performing cargo handling and logistics related activities in the seaports of the EU.

FEPORT fully subscribes to the objectives of the Green Deal and welcomes the opportunity to provide comments regarding the EU Commission proposal for a revised Renewable Energy Directive (RED III).

FEPORT members ensure activities that are at the junction between various modes of transport. Therefore, EU energy and environmental policies such as the recent “Fit for 55” proposals impact them in various ways. They have repercussions for the equipment terminals use during cargo handling operations and for the intermodal services they offer once cargoes are loaded on/unloaded from ships.

Terminal operators have an important role to play in the decarbonization of the EU transport sector. Since many years, FEPORT members have taken their responsibilities and decided to reduce the environmental footprint of their operations by making significant investments in green equipment, green training, and green intermodal operations.

With respect to the RED III proposal, FEPORT has the following comments:

### **1. When promoting the uptake of renewable and low carbon energy sources in transport, the role of ports and terminals should not be overlooked**

In its answer to the public consultation, FEPORT has supported increasing the renewable energy target for 2030 in the transport sector from 14% to 24%. We also welcome the current proposal as it increases the targets for the transport sector by introducing a requirement for reducing the greenhouse gas intensity of transport fuels by 13%.

However, in addition to stimulating the uptake of renewable energy in maritime, road, rail and air transport, the Renewable Energy Directive should equally focus on stimulating the use of renewable and low carbon fuels in the cargo handling sector.

Cargo handling equipment used in terminals such as straddle carriers, forklifts etc... will also be greened and this will also contribute to a reduction of the emissions of port operations.

One important way to stimulate the uptake of renewable and low carbon fuels is by bridging the price gap between green and more polluting alternatives, for which tax policies such as the Energy Taxation Directive are crucial.

However, since the transition of terminal equipment using diesel towards renewable energy is expensive, as retrofitting the engine is not always technically feasible, it will be key to specifically include terminal equipment into the RED III Directive in order to allow Member States to grant price support schemes for retrofits and replacements.

Moreover, it should be considered that in many cases, increasing the use of electricity or renewables by cargo handling equipment, requires infrastructure development in ports or terminals. It should therefore be ensured that such infrastructure works are also eligible for support schemes.

Finally, FEPORT welcomes that paragraph 7a of the amended article 9b encourages Member States bordering the same sea basin to jointly produce offshore renewable energy. This offshore energy could, for example, be used to provide shore-side electricity to vessels at berth. Only by guaranteeing that onshore power supply originates from green energy, can it be ensured that the requirements laid down in the FuelEU Maritime Regulation to use OPS will in the end lead to net emission reductions.

## **2. Allow for the support of fully renewable as well as low carbon fuels and energy sources**

For FEPORT, the decision as to whether a particular fuel or energy source should be promoted ought to depend on its capacity to reduce CO<sub>2</sub> and other greenhouse gases.

Furthermore, FEPORT believes that the decarbonization of transport is a process that progresses through a combination of major breakthroughs and incremental steps. Fully renewable energy sources are moreover not yet deployable and market-ready in every segment of the transport sector.

In that context, FEPORT proposes to amend the RED III Directive proposal to also include low carbon fuels while giving them a lower weight in EU and national renewable energy targets. This approach would encourage Member States to stimulate the uptake of low carbon fuels thus contributing to the decarbonization of transport and other segments of the economy. In the same vein, Member States should be allowed to engage in support schemes to stimulate the uptake of low carbon fuels.

## **3. Concluding remarks**

FEPORT favors increasing the targets for transport in the context of the review of the Renewable Energy Directive. When doing so, however, cargo handling should be included as it forms an essential part of the transport sector. It is crucial that any effort to increase the uptake of clean energy sources aims at bridging the price gap between fossil and renewable/low carbon alternatives. Member State support schemes have an important role to play in that regard.