



Common ESPO and FEPORT position paper on the proposed directive for the deployment of alternative fuels infrastructure

The main interest areas for ports in the proposed directive on the deployment of alternative fuels infrastructure are those concerning the provision of shore side electricity (article 4, paragraph 4) and of LNG refuelling points (Article 6, paragraph ..) in ports.

Regarding **shore side electricity**, ESPO and FEPORT are clearly against any introduction of legal obligations to ports for the provision of this technology.

European ports have been actively supporting this technology and exploring the possibility of providing shore side electricity in their berths. This has in cases lead to successful implementation projects. However, in other cases port feasibility studies show a lack of significant environmental benefits and disproportionate high investment costs. We are therefore convinced that shore side electricity is not a "one-size-fits-all" type of solution. Any investment on this technology needs to be justified through local feasibility studies and not imposed through a strict obligation. Shore side electricity should be promoted where and insofar it is beneficial for the environment and cost effective.

Therefore, ESPO and FEPORT are strongly against the relevant formulation of the TRAN committee Report, which introduces a strict obligation for core TEN-T ports to provide shore side electricity. ESPO and FEPORT are also against the later versions of texts that are proposed by the Rapporteur as part of the ongoing trilogue process that maintain this strict obligation for core TEN-T ports.

ESPO and FEPORT fully support the compromise proposal by the Greek Presidency on article 4(4) being "*Member States shall ensure that the need for shore-side electricity supply for inland waterway vessels or sea-going ships in maritime and inland ports is assessed in their national policy frameworks and that shore side electricity is installed by 31 December 2025 in those places where there is demand and the costs are not disproportionate to the benefits, including environmental benefits, as identified in the National Policy Framework.*" We believe that this text is balanced and promotes the provision of shore side electricity where cost effective and beneficial for the environment.

Concerning the deployment of **LNG refueling points** (article 6) in ports of the European core TEN-T network, ESPO and FEPORT are in favour of the pragmatic approach that is taken by both European institutions. The aim here should be the deployment of a sufficient network of LNG refueling points taking market realities and distances between ports into account. We believe that such an LNG refuelling network needs to be deployed already by 2020 in selected core TEN-T ports in order to be in consistency with the entering into force of the sulphur directive. It is of utmost importance though that the relevant co-funding possibilities for LNG projects are ensured also after the 2014-2020 period.

ESPO and FEPORT remain at the disposition of all interested parties for any further clarification.