



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,  
MARE/D3/RM

**Subject: NSAC Advice Ref. 15-2021**

Dear Mr Skau Fisher,

I have taken due note of the paper approved by the NSAC executive committee expressing support to the feedback provided by the NWWAC on the public initiative "CO2 emissions of engines - methodology for their reduction".

Attached you will find our response to the NWWAC.

I am looking forward to our continued fruitful cooperation. Should you have any further questions on this reply, please contact Ms Pascale COLSON, coordinator of the Advisory Councils ([Pascale.COLSON@ec.europa.eu](mailto:Pascale.COLSON@ec.europa.eu); +32.2.295.62.73), who will forward it to relevant colleagues.

Yours sincerely,

Charlina VITCHEVA

Enclosure: Reply to NWWAC feedback on public initiative "CO2 emissions of engines - methodology for their reduction" (Ares(2021)5863428)

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The Director-General

Brussels,  
MARE/D3/RM(2021)

**Subject: NWWAC feedback on the initiative “CO2 emissions of engines – methodology for their reduction”**

Dear Mr. Brouckaert,

Thank you for your letter of 6 August 2021 providing the feedback of the North Western Waters Advisory Council on the draft Commission Implementing Regulation implementing Regulation (EU) 2021/1139 establishing the European Maritime, Fisheries and Aquaculture Fund as regards the identification of energy efficient technologies and the specification of methodology elements to determine the normal fishing effort of fishing vessels.

On energy efficient technologies, the draft Commission Implementing Regulation aims at providing a list that is as comprehensive as possible, taking account of possible future developments in the forthcoming years and avoid excluding any potential new technology.

While some of the listed technologies such as ammonia, hydrogen or engines powered by electricity may indeed not be entirely mature or create specific challenges for fishing vessels, it cannot be entirely excluded that these technologies would be applied during the current programming period. We will consider including internal combustion and fuel cell hybrid, but do not envisage referring to the level of hybridisation. The reason for this is that it can be expected that the vessel owner would in any event opt for a sufficient degree of hybridisation when replacing the engine of a fishing vessel.

While other technologies, not related directly to the engine, can lead to the reduction of CO<sub>2</sub> emissions such as the use of wind propulsion, we cannot include these since the implementing regulation specifies rules regarding the replacement of the engine of the fishing vessel as such.

As regards the feedback on Article 2 of the draft Commission Implementing Regulation, it is precisely because of the varying operation by the fishing vessels that it is proposed to take a representative sample using the information on the operation of the vessel over

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three years and ten typical fishing trips carried out over this period. It will be up to the Member States to decide whether they carry out the measurement based on fuel consumption or on exhaust emissions. The measurement needs to be carried out during operation of the vessel using its current engine. Based on the technical characteristics of the new/modernized engine compared to the current engine, the reduction in CO<sub>2</sub> emissions or fuel consumption can be estimated.

Finally, although this goes beyond the purpose of the present implementing act, I can fully subscribe to the need to adopt a broader strategy addressing all greenhouse gas emissions and the decarbonisation of the fishing fleet. This is fully in line with the European Green Deal and will be specifically addressed in the report on the functioning of the Common Fisheries Policy, due to be presented by the Commission in 2022.

I thank you for the feedback provided and look forward to our continued fruitful cooperation. Should you have any further questions on this reply, please contact Ms Pascale COLSON, coordinator of the Advisory Councils ([Pascale.COLSON@ec.europa.eu](mailto:Pascale.COLSON@ec.europa.eu); +32.2.295.62.73), who will forward it to the relevant colleagues.

Yours sincerely,

Charlina VITCHEVA

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