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**27 September 2024** 

**Beatriz Yordi** 

Director of DG CLIMA EU ETS, International Carbon Markets and Clean Mobility European Commission

**Subject: Delegated Act amending Regulation 2015/757** 

Honourable Director Yordi,

As an elected Member of the European Parliament and a full member of the TRAN Committee, I would like to request your guidance and cooperation on certain elements of the delegated act amending Regulation 2015/757, specifically related to the rules for monitoring greenhouse gas emissions from offshore ships and the zero-rating of sustainable fuels.

In the first paragraph of the delegated act, there is a list of the different types of vessels. After reviewing the first draft of this delegated act, and later during the consultation period in August 2024, several Maltese associations (Malta Chamber of Commerce, Merchant Shipping Directorate, and European Tugowners Association) raised concerns, particularly regarding the classification of offshore tug/supply vessels.

Specifically the mentioned terms conflates two distinct types of vessels with different operational functions. Tugboats, which sometimes are classified as "offshore tugs" due to their operational capacity, may operate within a port areas and perform essential services like harbour towage, firefighting, and salvage operations, rather than offshore activities. Including these vessels under MRV requirements imposes an undue administrative burden on operators due to the high frequency of their movements and the minimal fuel consumption involved in their short port-bound voyages. A nuanced approach is therefore essential, to replace "Offshore Tug/Supply Ship" with "Offshore Supply Vessel" to accurately reflect vessels engaged in offshore activities while excluding tugboats that primarily operate within port areas.

While I am convinced that sustainability and the monitoring of greenhouse gas emissions are crucial elements of the green transition, maintaining the competitiveness of the sector is equally important for the success and growth of the European economy.

I look forward to discussing this matter with you in person next week and working together to find the best possible solution.

Yours sincerely,

MEP Daniel Attard