



# **Impact of the new IMO marine fuel regulations on transport in the Baltic Sea**

**- Comments on future policy on emission from ships**



# New IMO marine fuel regulations

  
**Stena RoRo**



  
**Stena Bulk**  
INNOVATION & PERFORMANCE



  
**Stena Drilling**



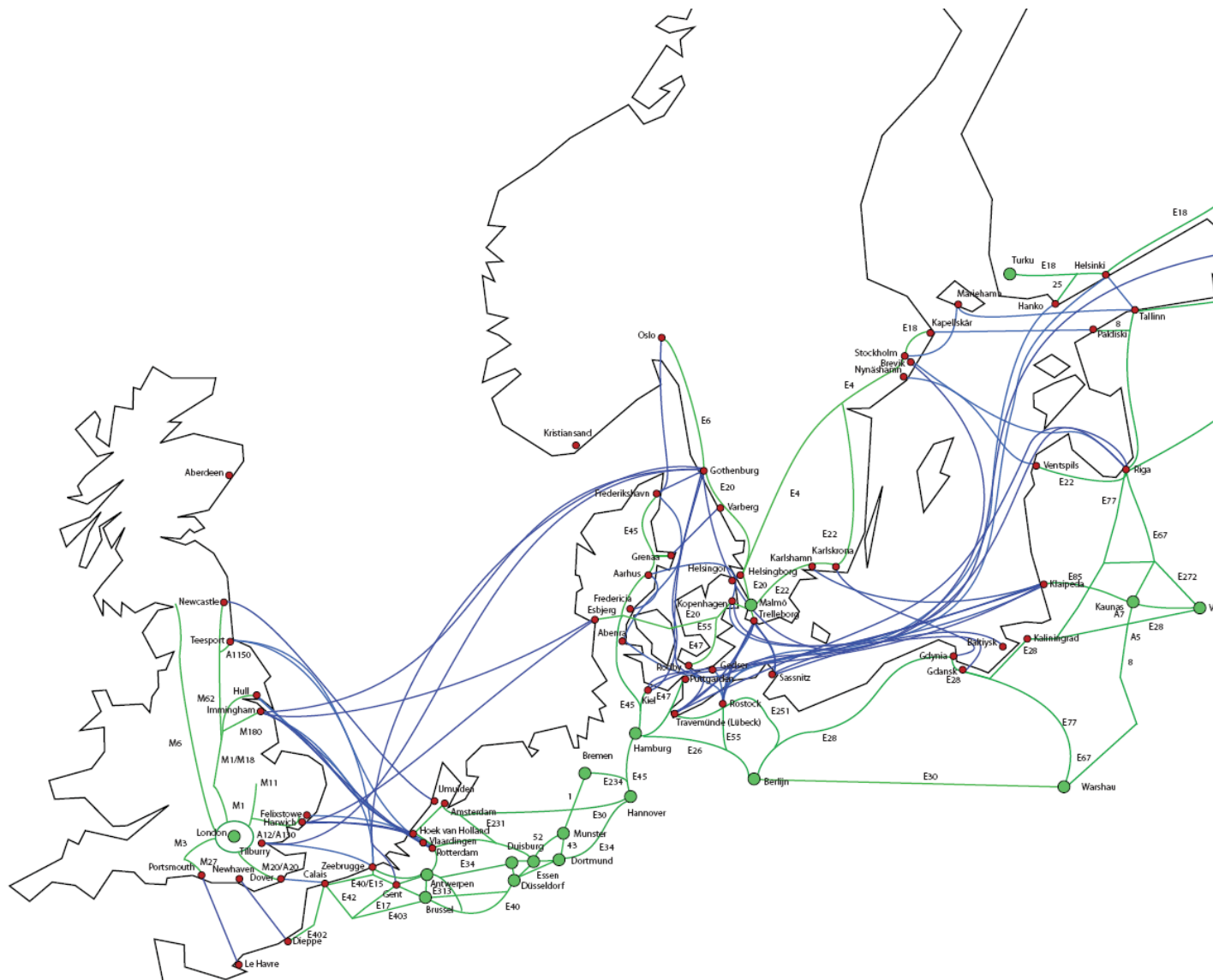
  
**Northern Marine  
Management**



  
**Stena Line**



Freight Lanemetres 5,500  
Passengers 1,500



Source: map compiled by ITMMA

# New IMO marine fuel regulations

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## Key Messages:

- 1. Impact Assessments must be mandatory.**
- 2. Consult the affected industry. Beforehand.**
- 3. Be holistic. What is the net outcome?**
- 4. Sentiment is a poor guide to wise decisions.**

# New IMO marine fuel regulations

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- Emissions of sulphuric oxides are detrimental to the environment and to human health.
- Consequently, it is correct to lower over all sulphur emissions from society, including those from marine fuels.
- New sulphur requirements will reduce shipping's environmental impact – but at what cost to society?
- Where were the impact assessments?



# New IMO marine fuel regulations

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- **Where were the impact assessments?**
  - **There are fundamental differences between deep sea and short sea shipping.**
  - **Deep sea can generally pass on costs to the clients.**
  - **Short sea is to a great extent in competition with other modes of transport.**
  - **Why is it evident that further reductions in the current SECA:s, will yield more benefit to society than reductions elsewhere?**



# New IMO marine fuel regulations

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- **Marginal cost of removed sulphur**

**1997 – Application for North Sea SECA**

## **Justification**

***Land based industries in EU-15 pay on average €1.5 per kg SO<sub>x</sub> removed. Going from global average (~3%) to 1.5% will cost €0.5 per kg SO<sub>x</sub> removed.***

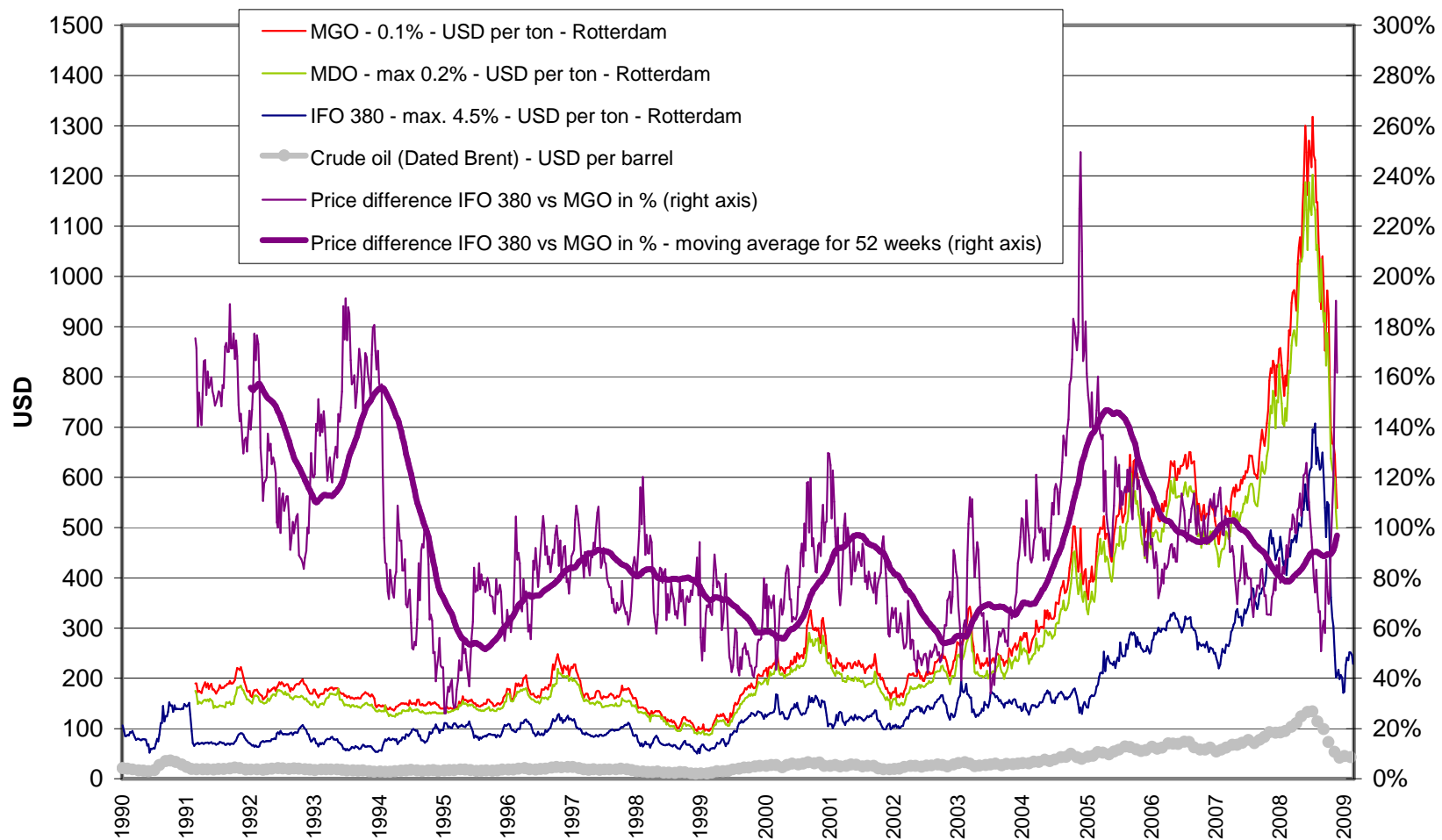
# New IMO marine fuel regulations

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- **Marginal cost of removed sulphur**  
**2008 – Revised sulphur limits**

**Justification ?**

<b>Fuel grade</b>	<b>\$/mt</b>	<b>kg SOx/mt</b>
HFO 3%	\$500	60
LSFO 1%	\$550	20
ULSFO 0.5%	\$600	10
MGO (=HFO +93%)	\$965	2



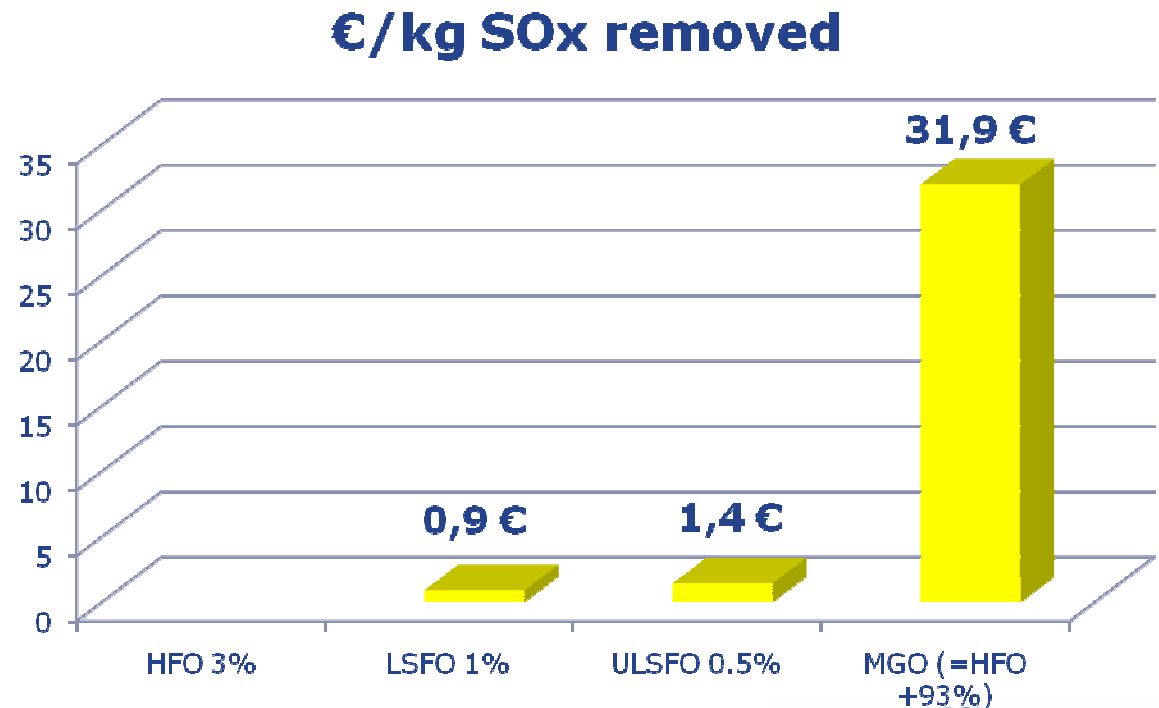
Source: ITMMA based on data Clarkson

# New IMO marine fuel regulations

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# New IMO marine fuel regulations

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- **What are the financial implications?**
  - **Several studies ongoing; common result → structural change to the market.**
  - **With average 2008 prices, the additional cost within the existing (S)ECA:s is roughly 10 billion dollars per year.**
  - **How do we prevent modal back shift?**



# New IMO marine fuel regulations

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- **What are the trade implications?**

**The additional regional requirements in IMO Marpol Annex VI, will lead to:**

**60-80% increase in cost of Marine fuel in Northern Europe:**

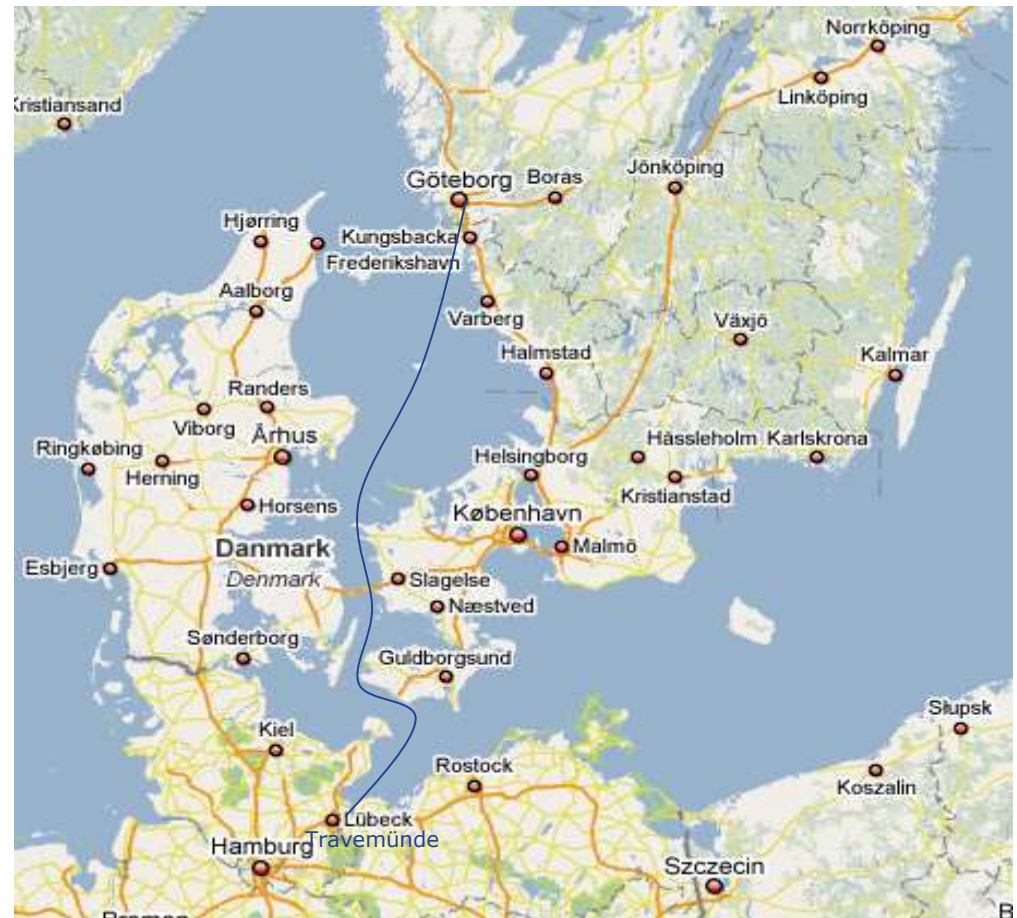
- ↳ 20-40% loss of the number of trucks being shipped in short sea services today.
- ↳ Those trucks will be road borne instead.
- ↳ Modal back-shift in direct contradiction of EU policy.
- ↳ What is the net cost to the Community?

# New IMO marine fuel regulations

- **What are the trade implications?**

## Ro/Ro -route Gothenburg-Travemünde

- 100.000 freight units per year
- Sailing time 15 hrs
- Increased fuel cost 60% due to use of MGO
- 0.1%
- Rate increase 25-35% to cover for increased fuel cost
- Expected modal shift "From Sea to Road" >50% as a consequence of increased fuel cost (>150 more trailers on the road every day with more noise, traffic jams, emissions, burden on infrastructure, frequency of accidents etc.)
- Route will have to close down due to lack of profitability



# Future regulations

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- Now we can expect NOx ECA in the Baltic and eventually also in the North Sea.
- It was not self evident that there would be an Impact Assessment.
  
- North America is going for NOx, PM and SOx simultaneously; should we expect the EU to follow suit?
- If so, what will the impact be on short sea shipping?



# Future regulations

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- **Energy Efficiency**

- The ongoing development of an Energy Efficiency Design Index in IMO is in itself genuinely positive.
- Unfortunately, it takes its base solely in prevailing conditions for Deep Sea Shipping.
- 1.8 round trips per day will not be very popular.
- No impact assessments made.



# Future regulations

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- **Effluents to water**

- HELCOM will apply for the Baltic to be a special area.
- Black and grey waters are to be treated with advanced technology or to be pumped ashore.
- No special fee. Of course?
- No impact assessments made.

# Future opportunities

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- **Technological development**

- **Energy savings**

Still untapped resource

Do not forget the client's role!

- **Air Cavity**

Exciting, but still far to go

- **Sails**

Sure, if applicable

- **Shore power**

Absolutely, when applicable

- **LNG**

Not an obviously lower carbon footprint,  
and give us a price already!



# Thank You!

