



UK National
Clean Maritime
Research Hub

Clean Maritime Assembly 2026

Collaboration | Innovation | Transformation



Engineering and
Physical Sciences
Research Council

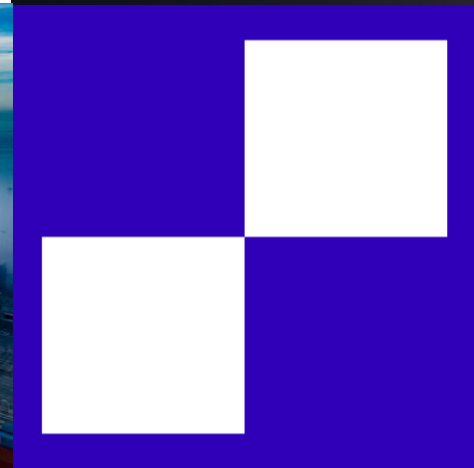
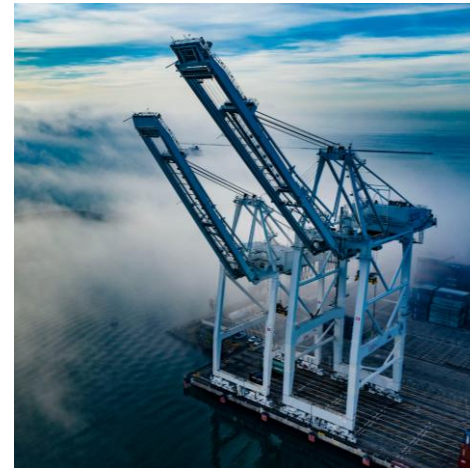
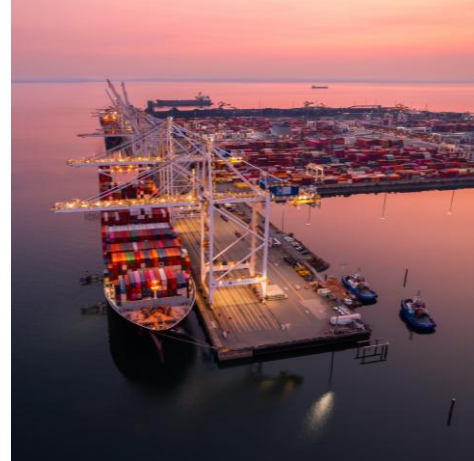
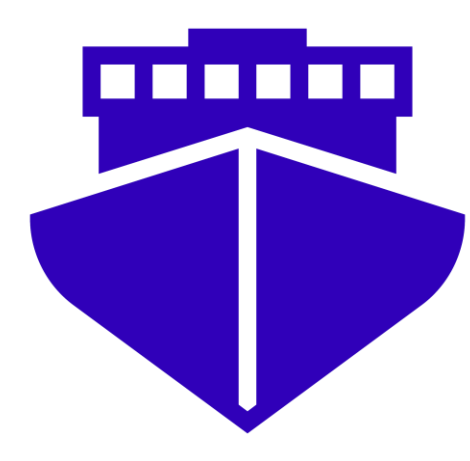
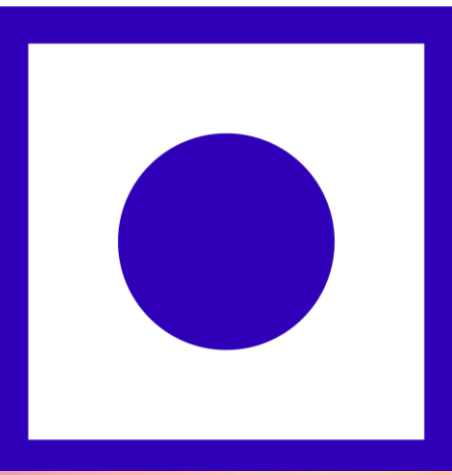


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Session 1

Enabling the Clean Maritime Transition

- Daniel Barton, The Waves Group
- Elaine Scott, Port of Tyne



Clean Maritime Assembly 2026

Alternative fuels – an operational perspective

June 2026

www.waves-group.co.uk

Alternative fuels

Operational Perspective

- Describe the three most popular alternative fuels
- Risks
- Benefits
- Considerations
- Risk assessment
- Training



Truck to Ship LNG Bunkering (Waves Group)

- Liquefied Natural Gas
- Primarily Methane
- CH₄
- Less CO₂ emissions (-25% at the exhaust)
- Non Toxic, colourless, odourless
- Cryogenic
- Specialist training
- PPE
- Green Credentials?



Ship to Ship Methanol Bunkering (Port Authority of Singapore)

- Aliphatic alcohol
- CH_3OH
- Primarily used in the plastics industry
- Less CO_2 emissions (-16%)
- Produced from fossil fuels, primarily natural gas and coal
- Green and Blue production
- Risks
- Special training
- PPE



Shore to Ship Ammonia Bunkering (Ulsan Port Authority)

- Chemical
- NH_3
- Primarily used in fertiliser
- Zero CO_2 emissions
- Produced from fossil fuels, primarily coal and natural gas
- Green and Blue production
- Risks
- Special training
- PPE

- Low flash point.
- Cold temperatures (LNG and Ammonia)
- Leakage of liquid and vapour
- Toxicity
- Waste management

- Less CO₂ at the exhaust
- Green credentials of the fuel
- Emissions trading schemes to encourage green production.

Considerations

- Availability of Fuel
- Bunkering method, location and infrastructure
- Simultaneous Operations
- Special features for vessels to comply with regulations
- Dry docking

- **For the Vessel**

- Risk based design analysis for the vessel

- **For bunkering and storage**

- Bunkering method and Location?
- Local regulations?
- Storage or portable tanks? DSEAR/COMAH
- HAZID and HAZOP techniques are used to establish safe method

- **Dry docking**

- Local regulations and permitting

- **For Crew**

- For ship - IGF training for low flashpoint fuels – seatime/refreshers.
- 30 days seatime on IGF vessel

- **For bunkering**

- For bunkering supplier and operatives

- **For builder and repair yards**

- Expertise is generally required and training is recommended



Thank you.

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Decarbonisation at Ports — Opportunities & Challenges

Elaine Scott, Director of Innovation

Clean Maritime Assembly: 25 June 2026



The BIG Picture:

Port of Tyne at a Glance

- **650** acres of freehold land
- Trust Port supporting **10,500** jobs
- GVA **£766m**
- **Connectivity** (air, rail, metro, road)
- Deep Sea **13.5m**
- **90%** of the world's largest vessels
- **200** Acre Tyne Clean Energy Park
- Rail Connections to East Coast Main Line
- UK's first Maritime Innovation Hub
- Bulks, Renewables, Offshore, Automotive Containers, Ro-ro, Cruise, Ferry, Estates

PORT OF TYNE



portoftyne.co.uk

PORT OVERVIEW 2025



About Us

- **2nd biggest** car exporter in UK
- **1 in every 8** lightbulbs in UK
- Base for the world's biggest windfarm – Dogger Bank
- Marshalling Port for the Sofia and Hornsea 3 windfarms
- **40%** UK's tea
- Regional centre for cruise and ferry
- UK's first Maritime Innovation Hub
- Key to delivering NE Mayoral Strategic Authority goals

P O R T O F
T Y N E
~~~~~

# Why Ports Are Central to Decarbonisation



## Ports as Enablers

Maritime handles 92% of freight transport. Ports are unique nodes in the maritime supply chain – they directly control shore-side emissions and enable vessel operators to access clean fuels and shore power.



## UK Maritime Decarbonisation Strategy

UK domestic maritime targets: at least **30% GHG reduction by 2030**, 80% by 2040, and net-zero lifecycle emissions.



## Global Emissions

Maritime transport accounts for ~3% of global GHG emissions, more than the bus and rail sectors combined. Without intervention, this share will rise.



## Port-Side Scope 1 & 2

Ports control direct emissions from cranes, handling equipment, buildings, and vehicles, and indirect grid-electricity emissions. Electrification is the primary short-term lever.

# A Changing Regulatory Landscape

**IMO Net Zero  
Framework**

**FuelEU**

**UK ETS**

## Why this matters?

- Cleaner fuels and shore power become more important
- Robust emissions data becomes essential
- Policy direction affects timing and investment decisions

# Key Operational Challenges Ports Face



## Legacy Assets

Port equipment has 15+ year lifespans. Replacing mid-life assets creates double cost: write-off + replacement..



## Grid Constraints

National Grid capacity is limited. Lead times for new grid connections exceed 18 months.



## Sticky Carbon

Some emissions are hard to abate, heating systems, specialist plant equipment.

5



## Data Fragmentation

Emissions data is often siloed across departments, requires significant processing time, and cannot drive action without interpretation. Data is useful; *information* is vital.



## Capital Constraints

Green investment requires balancing sustainability, affordability, value, time and risk. Need for robust business cases.



## Scope 3 Complexity

Majority of port emissions sit in Scope 3 — supply chain, leased assets, etc — where the port has limited direct control.

# Key Opportunities at Ports



## Asset Electrification

Convert diesel cranes, forklifts and handling equipment to electric.  
Reduces Scope 1 directly



## Onsite Renewables

Roof-mounted solar on warehouse buildings, wind energy partnerships.  
Reduces Scope 2 and provides energy resilience.



## Shore Power

Provision of electrical power to vessels at berth eliminates auxiliary engine emissions. A key enabler for vessel decarbonisation.



## Smart Operations

LED retrofit across all structures and assets delivers immediate energy savings. Automation also improves operational and carbon efficiency.



## Green Corridors & Collaboration

Partnerships with other ports, tug operators, shipping lines and energy suppliers to drive Scope 3 reductions across the maritime value chain.



## Energy Hub Role

Ports as clean energy hubs: integrating offshore wind energy, green hydrogen, ammonia bunkering infrastructure, and grid-level storage.

**PORT OF  
TYNE**

[portoptyne.co.uk](http://portoptyne.co.uk)

# Port of Tyne Decarbonisation

PORT OF TYNE

# Our Environmental Impact – The Starting Point

**Port-owned fleet, plant equipment**

SCOPE 1 CO<sub>2</sub>e

**Equiv. to ~7,000 homes annually**

ENERGY CONSUMPTION

**70–80%**

SCOPE 3 SHARE

Vessels & supply chain emissions

**2030**

**Net Zero Target**

Scope 1 & 2

**2040**

**All-Electric**

Full fleet electrification

**2050**

**Net Zero Target**

Scope 1, 2 & 3

# Taking a wider view – Our Five Focus Areas for Decarbonising



## Education

Training colleagues on climate impacts. UK-first Port Carbon Literacy Program.



## Energy

Expand onsite renewables, use transitional fuels, replace ICE plant with electric.



## Reporting & Policies

Sustainable travel, sustainable purchasing policies, transparent KPI reporting.



## Supply Chain

Require suppliers to provide emissions data. Purchase only from those on an emissions reduction journey.



## Biodiversity

Create biodiversity hotspots. Fortifies local climate resilience. Net gain, not just no-loss.

## Governance Framework

Climate Governance Committee (cross-departmental oversight, quarterly reporting to Board) + Sustainability Steering Group (day-to-day progress). Goals must be achievable, demonstrable, and verified.

## Sustainable Purchasing — 5 Decision Dimensions

Every procurement decision assessed against: **Sustainability** · **Affordability** · **Value** · **Time** · **Risk**. Embedded in business case process with colleague training for consistency.

## Our Main Challenges

- Infrastructure costs and grid upgrades can run into millions, with lead times of around 24–30 months.
- Land availability matters because generation and storage can compete with operational space.
- Environmental data sits across multiple systems, making performance hard to track consistently.
- Some technologies are still hard to justify when carbon savings do not yet match cost.
- Scope 3 progress depends on shipping lines, tenants and suppliers moving too.
- 'Chicken and Egg' dilemma for Shore Power & Alternative Fuels

## Our Main Opportunities

- Technology is advancing quickly across electrification, battery storage, smart energy management and low-carbon fuels.
- UK SHORE and related funding can help ports test innovation, reduce risk and strengthen business cases.
- Green shipping corridors can create demand for coordinated action between ports, vessel operators and energy partners.
- Think 'out of the box' solutions in maritime: vessel design, logistics planning including shipping routes

# PORT OF TYNE



Our journey so far to  
Net Zero and All  
Electric

NO ORDINARY RIVER.

[portoftyne.co.uk](https://portoftyne.co.uk)

- **Electric Vehicles:** Port has replaced its diesel light commercial vehicles with electric alternatives and put in place charging infrastructure
- **Transitional Fuels:** From June 2024 the Port's HGV fleet moved to using HVO as it's primary fuel.
- **Electrification of Cargo Handling Equipment** 1<sup>st</sup> crane has successfully operated on full electric.
- **690kWp solar array scheme installed on Warehouse 21 – our largest warehouse**
- **Artemis – UK first electric foiling pilot vessel**
- **Carbon Literacy Trust** for Ports
- **Green Shipping Corridor** project between Port of Tyne and Ijmuden
- **Efuels feasibility** study with Hitachi

# PORT OF TYNE



Clean Energy Testbed  
through the 2050  
Maritime Innovation  
Hub

NO ORDINARY RIVER.

[portoftyne.co.uk](http://portoftyne.co.uk)

- Collaboration with partners (academia, SMEs, cross-sectoral) to develop innovative environmental solutions and to co-create energy test-bed opportunities for the Port and its customers.
- We are creating feasibility study opportunities and testbeds for new clean energy solutions and trial emerging technology.
- **Living Laboratory** to support clean energy businesses.

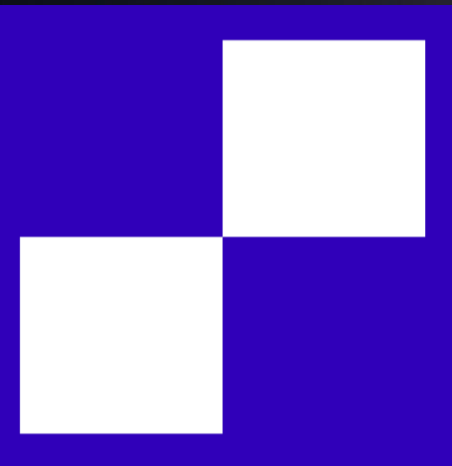
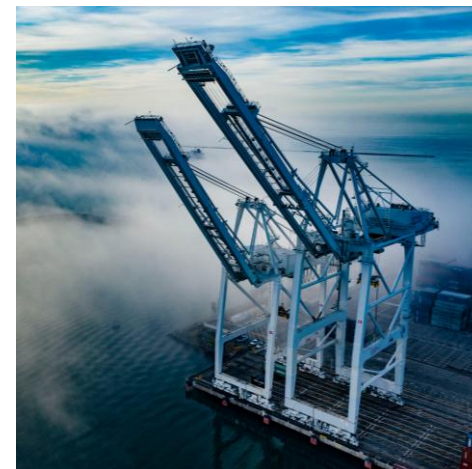
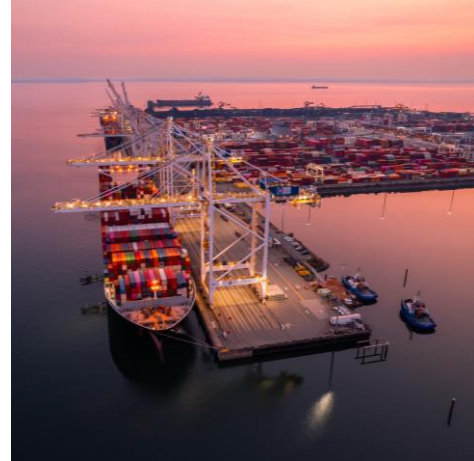
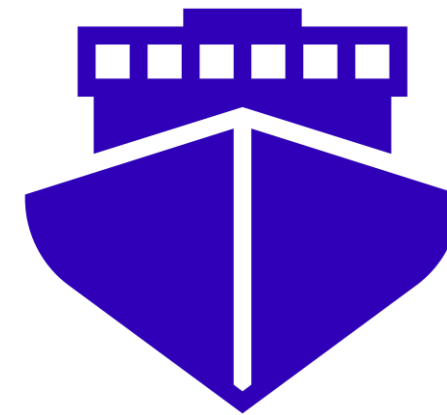
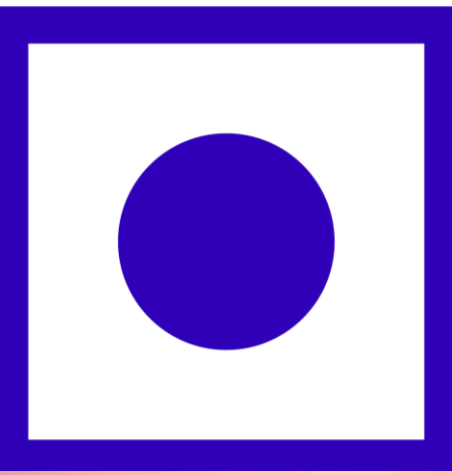
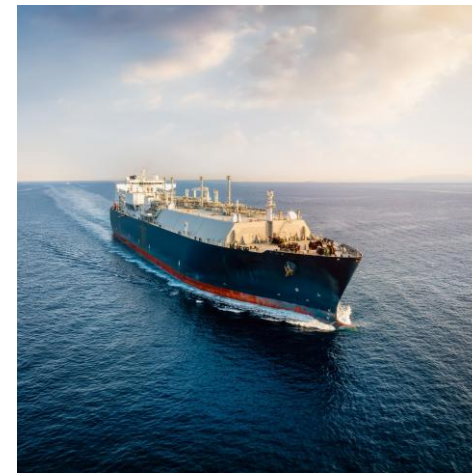


PORT OF TYNE

## Session 2

# Risk & Asset Management

- Sujit Viswanathan, DNV
- Moya Crawford, DeepTek
- Sarah McCann, NorthStandard





WHEN TRUST MATTERS

# Future Fuels: Navigating Real, Manageable Risks

UK Clean Maritime Research Hub – Clean Maritime Assembly 2026

Capt. Sujit Viswanathan - DNV

25 June 2026

# A global assurance and risk management company

160+  
years

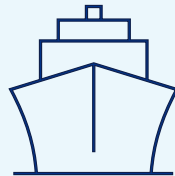
~13,000  
employees

~100,000  
customers

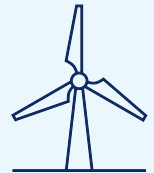
100+  
countries

6%+  
of revenue in R&D

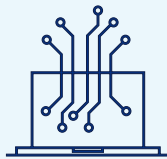
Ship and offshore  
classification and advisory



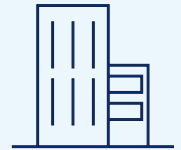
Energy advisory, certification,  
verification, inspection and  
monitoring



Software, cyber security,  
platforms and  
digital solutions



Management system  
certification, supply chain and  
product assurance



# Topics

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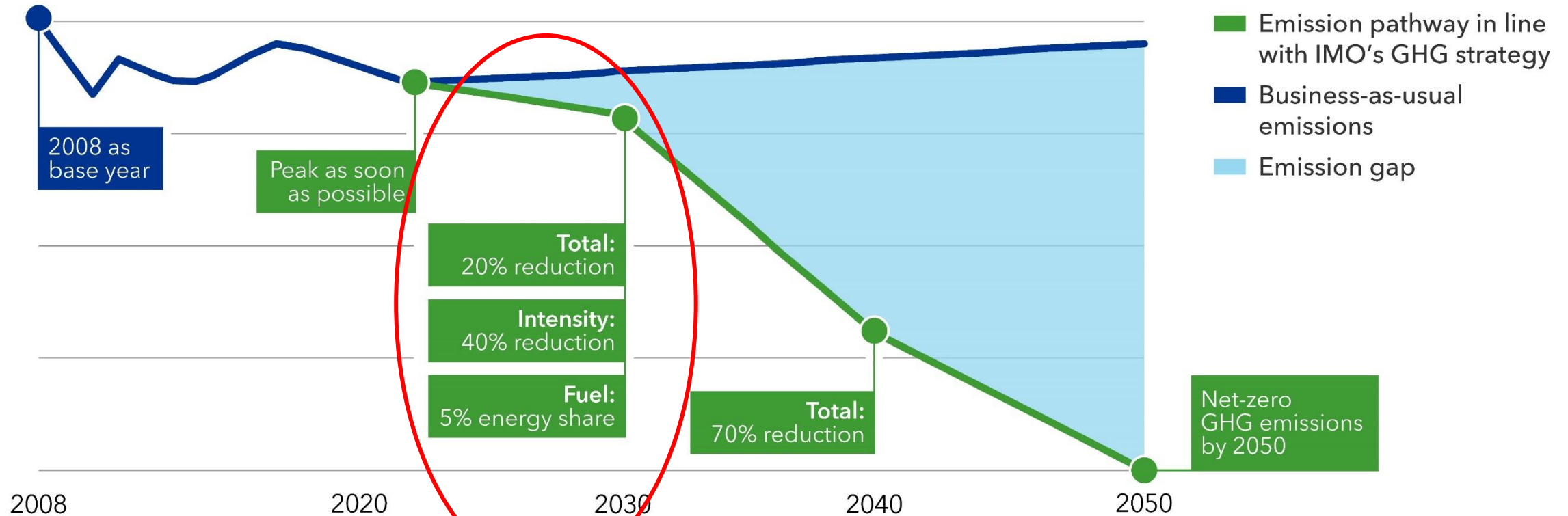
- 01 Alternate fuels status
- 02 Technology trade-offs
- 03 Hazards & risk management
- 04 Retrofit - the challenges
- 05 Human Element
- 06 Summary and take aways

# Alternate Fuels on vessels

*“where we are and where we are headed”*

# IMO decarbonization ambitions significantly strengthened

Units: GHG emissions

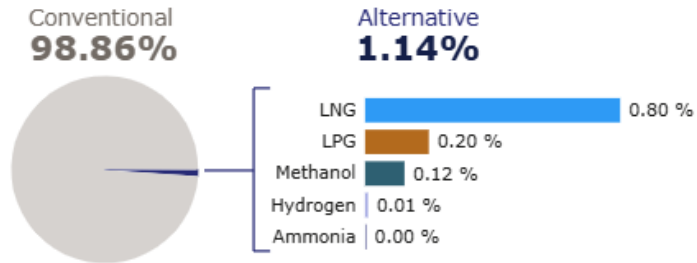


**Total:** Well-to-wake GHG emissions; **Intensity:** CO<sub>2</sub> emitted per transport work; **Fuel:** Uptake of zero or near-zero GHG technologies, fuels and/or energy sources

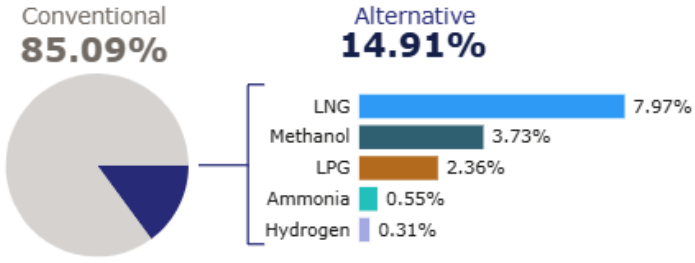
# Conventional vs Alternate Fuels – an uptake overview

## Number of Ships

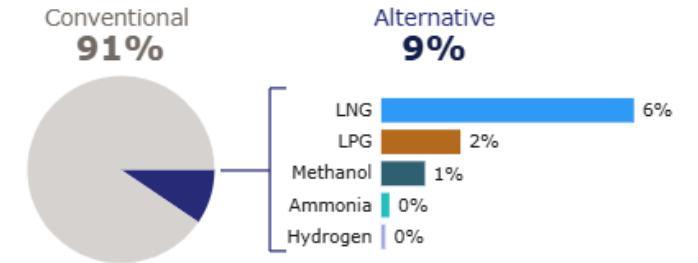
### In operation



### On order

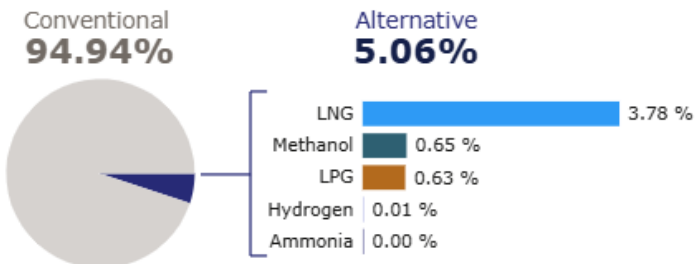


### New contracts in the last 12 months

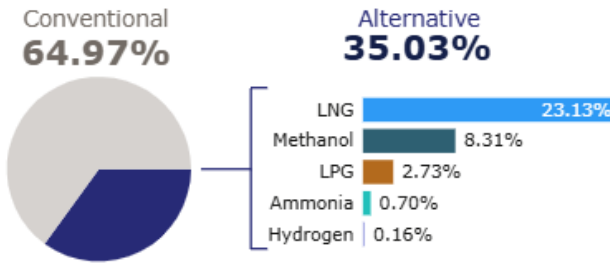


## Gross tonnes

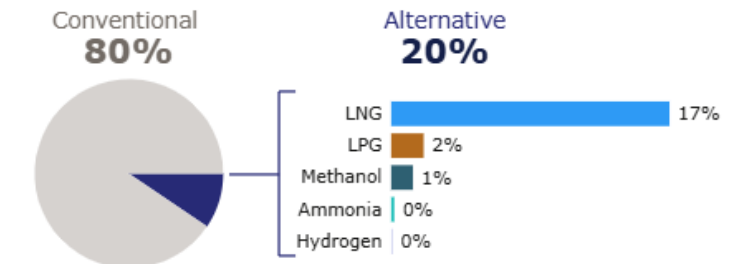
### In operation



### On order



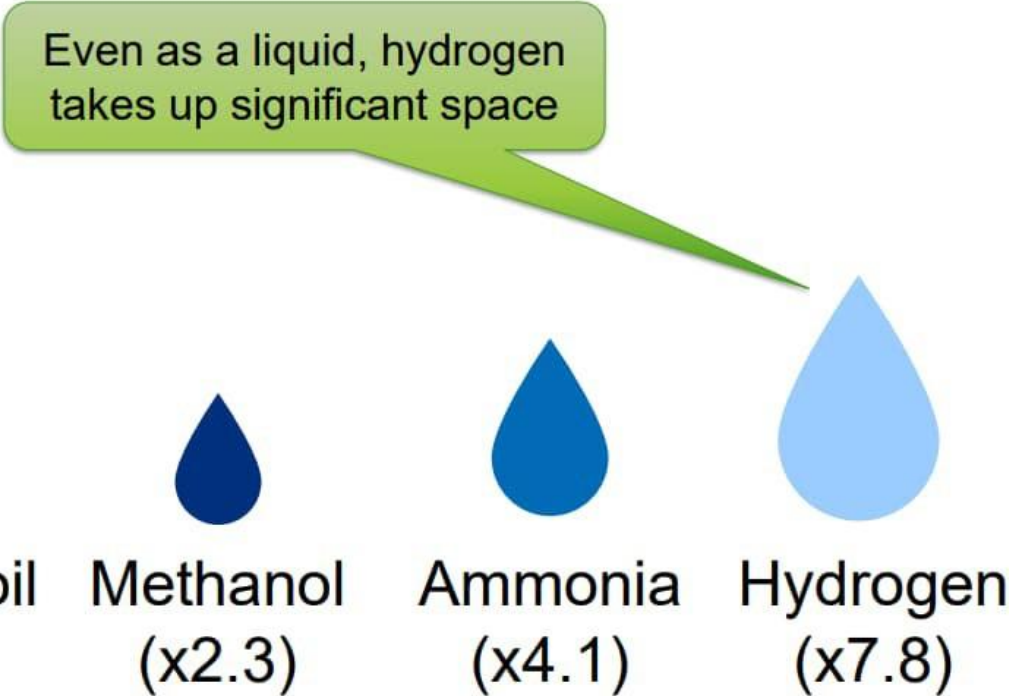
### New contracts in the last 12 months



# Technology trade offs

# Storage vs loss of revenue space

Comparison of liquid storage volumes for equivalent energy content



**Tank volumes for ammonia and hydrogen account for insulation ('system-level' densities).**  
Ammonia: Ricardo calculations based on expected design of ammonia storage tanks (inner tank, insulation, outer)  
Hydrogen: Minnehan and Pratt (2017), Comer (2019)

# Battery Vessels

## Distribution of battery fleet

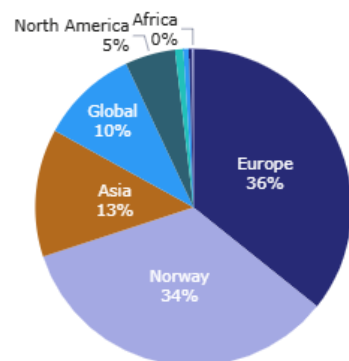
### Battery ships in operation

1392

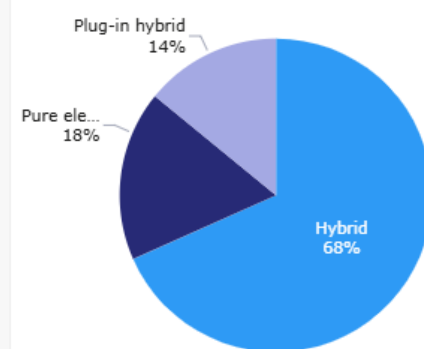
### Battery ships on order

516

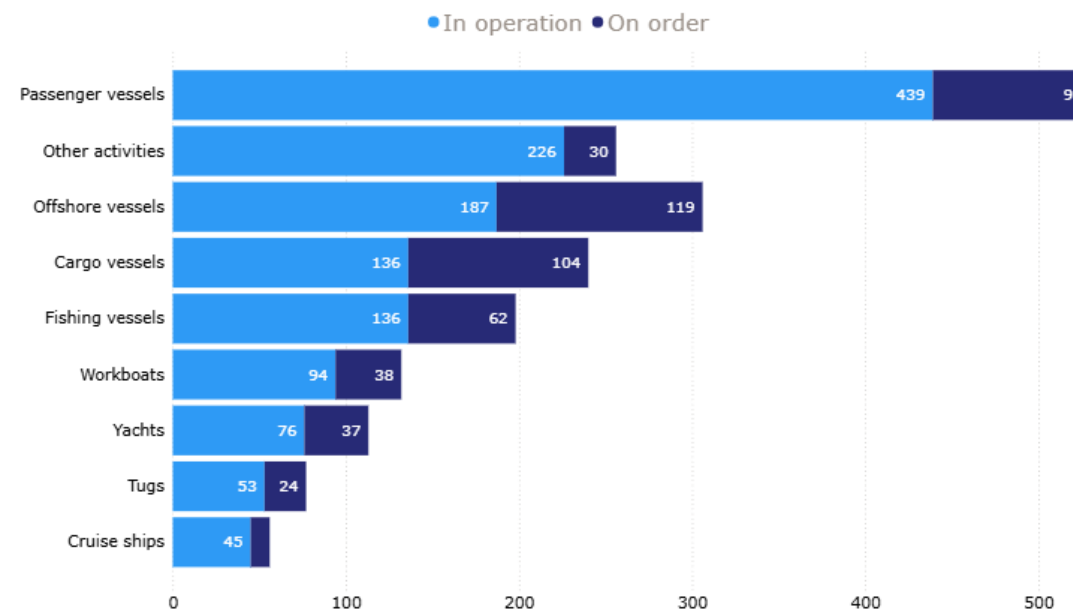
### Battery ships by region



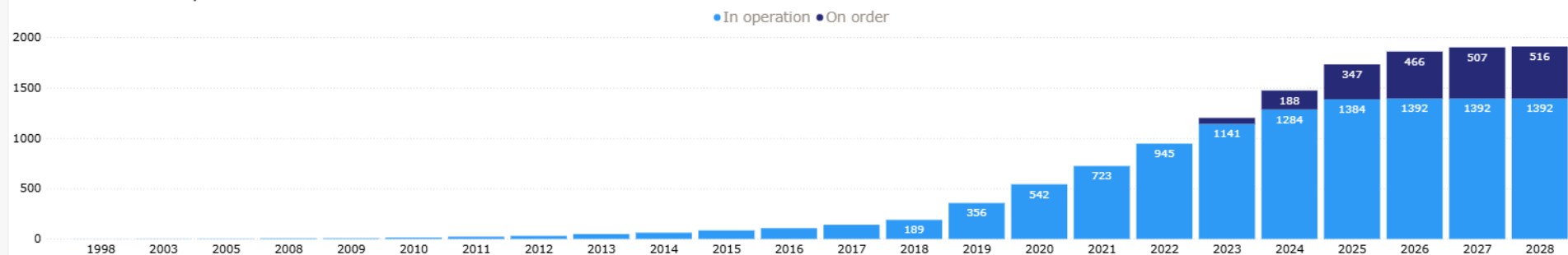
### Battery ships by application



### Battery ships by ship type



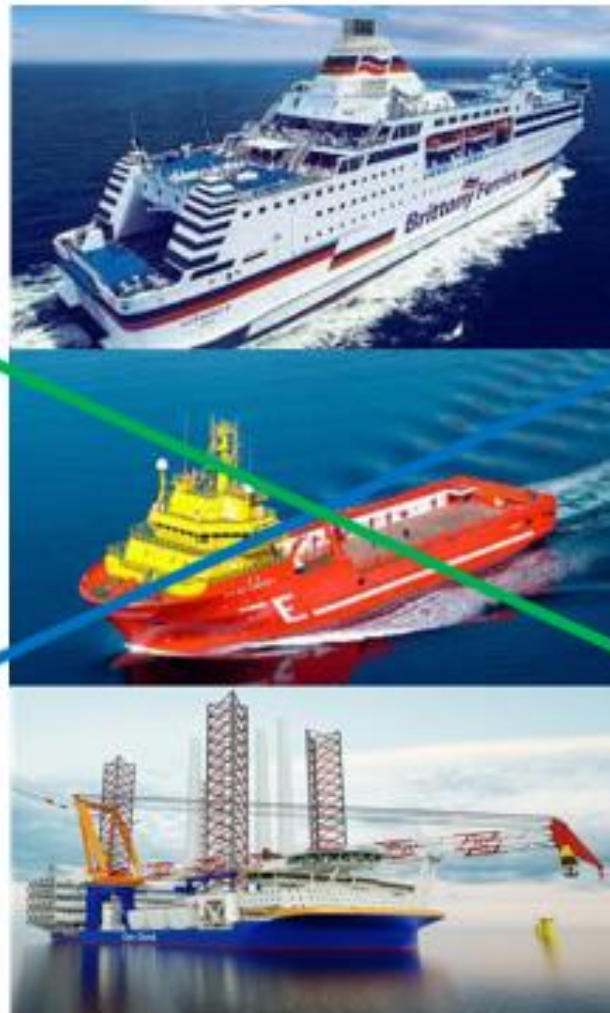
## Growth of battery fleet



## Ocean Going ships



## Short Sea/Near Shore Offshore O&G/Wind



## Harbour/Coastal

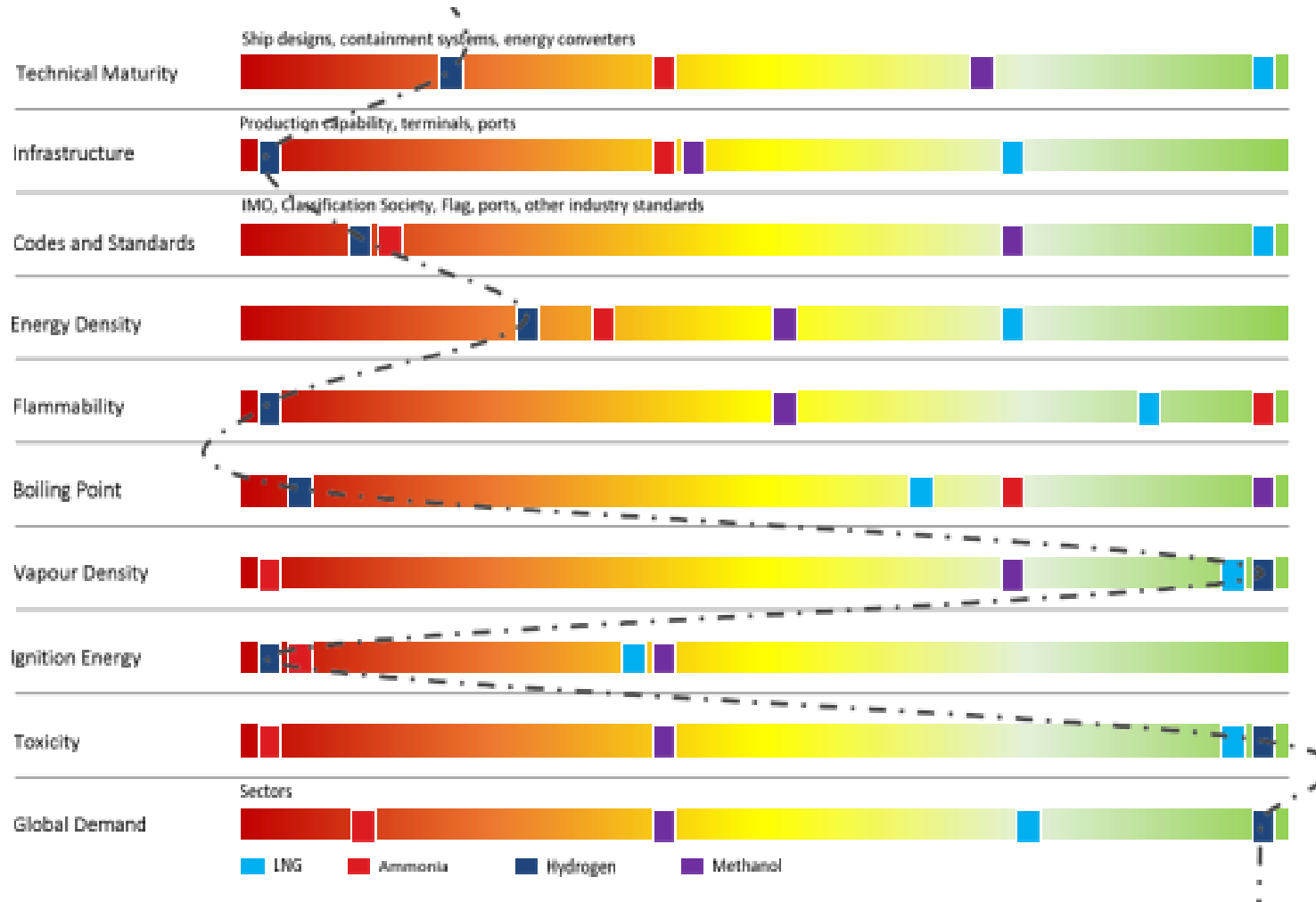
Role of efficiency improvement &  
Electrification



Role of sustainable fuel

# Hazards and Risk Management

# Future Fuels – Heat Map Comparison



Courtesy – Shell International

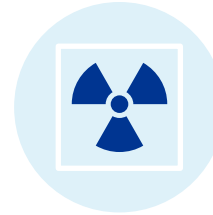
## Key takeaways

- The heat map shows a transition landscape — no single fuel wins across every criterion.
- **LNG and methanol** look more deployable near term where maturity, infrastructure and standards are stronger.
- **Hydrogen and Ammonia** carry high decarbonisation potential, but safety and handling risks need tighter controls.
- Adoption will depend on aligning vessel design, ports, regulation and sector demand — not fuel chemistry alone.

# Risk Management Methodology



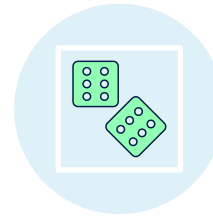
**Systematic Approach**



**Hazard Identification (HAZID):** Early-stage identification of potential threats.



**Hazard & Operability Study (HAZOP):** Detailed process safety review.



**Quantitative Risk Assessment (QRA):** Calculating probability and consequence (e.g., for LNG bunkering zones).



**Bow-Tie Analysis:** Visualizing threats, barriers, and consequences (specifically for Battery/EES systems).



**FMEA:** Failure Mode and Effects Analysis for critical machinery.

# Risk comparison table across 5 fuels

| Risk factor  |  <b>LNG</b> |  <b>LPG</b> |  <b>Methanol</b> |  <b>Ammonia</b> |  <b>Hydrogen</b> |
|-----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|
| <b>Primary hazard</b>                                                                         | <b>Cryo + flamm.</b>                                                                         | <b>Flamm. + pressure</b>                                                                     | <b>Flamm. + toxicity</b>                                                                            | <b>Toxicity</b>                                                                                    | <b>Flammability</b>                                                                                 |
| <b>Storage</b>                                                                                | Cryo -162°C                                                                                  | Pressurised ambient                                                                          | Ambient liquid                                                                                      | Refrig./press.                                                                                     | <b>Cryo -253°C or HP</b>                                                                            |
| <b>Vapour density</b>                                                                         | Lighter                                                                                      | Heavier                                                                                      | Heavier                                                                                             | Lighter                                                                                            | Much lighter                                                                                        |
| <b>Detection</b>                                                                              | Upper / ceiling                                                                              | Lower / bilge                                                                                | Lower spaces                                                                                        | Upper / vent.                                                                                      | Upper / ceiling                                                                                     |
| <b>Flammable range</b>                                                                        | 5–15%                                                                                        | 2–10%                                                                                        | 6–36%                                                                                               | 15–28%                                                                                             | <b>4–75%</b>                                                                                        |
| <b>PPE</b>                                                                                    | Yes (cryo)                                                                                   | Yes (pressure/cold)                                                                          | Yes (bunkering)                                                                                     | <b>Extensive</b>                                                                                   | Yes (cryo/pressure)                                                                                 |
| <b>Emergency showers</b>                                                                      | Yes                                                                                          | Yes                                                                                          | <b>Critical</b>                                                                                     | <b>Critical</b>                                                                                    | Yes                                                                                                 |
| <b>Escape</b>                                                                                 | Standard                                                                                     | Standard                                                                                     | Standard                                                                                            | <b>Toxic cloud</b>                                                                                 | Heat radiation                                                                                      |
| <b>Material</b>                                                                               | <b>Embrittlement</b>                                                                         | Standard                                                                                     | Corrosion                                                                                           | Corrosion + toxicity                                                                               | <b>H<sub>2</sub> embrittlement</b>                                                                  |
| <b>Boil-off</b>                                                                               | <b>Required</b>                                                                              | Yes                                                                                          | N/A                                                                                                 | <b>Required</b>                                                                                    | Yes (compressed)                                                                                    |
| <b>Secondary barrier</b>                                                                      | <b>Required</b>                                                                              | As needed                                                                                    | No                                                                                                  | As needed                                                                                          | As needed                                                                                           |
| <b>HAZID</b>                                                                                  | IGF Code                                                                                     | IGF Code                                                                                     | IMO Circ.1621                                                                                       | + toxic zone                                                                                       | QRA                                                                                                 |
| <b>Hazard zone</b>                                                                            | <b>Zone 0</b>                                                                                | Zone 1/2                                                                                     | Zone 1/2                                                                                            | Zone 1/2 + toxic                                                                                   | <b>Zone 0/1/2</b>                                                                                   |

# LNG - Dispersion



# Battery Failure



Ref: Maritime technologies forum – Felicity Ace



Ref: [bbc.co.uk](https://www.bbc.co.uk)– Fremantle Highway



Ref: International Business times – Morning Midas

# Battery Fire risks



## ⚠ Why These Fires Are Different

- **Thermal Runaway** → self-sustaining, high heat ( $>600^{\circ}\text{C}$ ), re-ignition risk
- **Propagation Risk** → spreads unit-to-unit (vehicles / battery racks)
- **Confined Spaces** → explosion + toxic gas accumulation
- **Detection Gap** → fires often identified only after escalation

## ⚠ Operational & Assurance Challenges

- **Firefighting at sea** = limited resources, delayed support
- **Traditional suppression ineffective** → containment strategy (“let it burn”)
- **Cargo risks**: misdeclaration, poor securing, damaged units
- **Design limitations**: dense stowage, insufficient segregation



*Fires are energy driven requiring containment more than suppression*

# Retrofit – Challenges and Risk Management



- World's first Methanol conversion project of a mega container carrier – 20000 TEU (LOA 400m)
- 7-year-old vessel retrofitted in CHI-Shanghai in 2025.

| Challenge Area                                        | What Made It Challenging                                               | How It Was Handled / Mitigated                    | Outcome / Insight                |
|-------------------------------------------------------|------------------------------------------------------------------------|---------------------------------------------------|----------------------------------|
| <b>System Integration Complexity</b>                  | Retrofit into legacy design                                            | Tailored engineering + interface control          | Proven retrofit viability        |
| <b>Multi-Stakeholder Coordination</b>                 | Many suppliers, first-of-kind                                          | Strong coordination & clear stakeholder alignment | Enabled delivery at scale        |
| <b>Construction &amp; Installation Approach</b>       | Block install impractical                                              | Shift to phased build                             | Reduced risk, smoother execution |
| <b>Operational Safety &amp; Systems Interaction</b>   | New fuel, new risks                                                    | Trials + system validation                        | Safety concept established       |
| <b>Cargo Capacity Trade-off</b>                       | Methanol tanks required significant space, reducing container capacity | Design optimisation                               | Trade-off understood             |
| <b>Technology Maturity &amp; First-of-a-Kind Risk</b> | Limited precedent                                                      | Iterative “prototype” approach                    | Clear pathway created            |
| <b>Future Fuel Uncertainty</b>                        | Evolving fuel landscape                                                | Flexibility in design                             | Future-ready vessel              |

# Human Element



- MSC 111<sup>th</sup> Session in London – May 2026
- The Committee approved new guidelines to promote the :
  - Interim Guidelines for the safety of ships using **hydrogen** as fuel; and
  - Interim Guidelines for the safety of ships using **ammonia** as fuel.
- The Committee approved two new sets of interim guidelines for training seafarers on ships using alternative fuels and technologies:
  - Interim guidelines on **training for seafarers** on ships using **methyl/ethyl alcohol** as fuel; and
  - Interim guidelines on **training for seafarers** on ships using **ammonia** as fuel.
- “**one ship, one code**” principle to gas carriers using alternative fuels - the IGF Code or IGC Code - improving consistency and clarity in the regulatory framework

# Guidance and Framework

Ref ([Lloyd's Register](#) [Bureau Veritas Marine & Offshore](#) [DNV - Rules and Standards](#))

| DNV Document                                                                                   | Bureau Veritas (BV) Equivalent                                                                                                                                                        | Lloyd's Register (LR) Equivalent                                                                                                                                                           |
|------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>DNV-RU-SHIP Pt.6 Ch.2</b> - Ships using gases and low-flashpoint fuels (IGF implementation) | <b>NR529 Gas-Fuelled Ships</b> (LNG/CNG/LFP fuels), plus <b>NR670 Methanol &amp; Ethanol-Fuelled Ships</b> , <b>NR671 Ammonia-Fuelled Ships</b> , <b>NR678 Hydrogen-Fuelled Ships</b> | <b>LR-RU-012 Rules and Regulations for Classification of Ships using Gases or other Low-Flashpoint Fuels</b> (includes LNG, methanol, ammonia, hydrogen appendices and IGF implementation) |
| <b>DNV-ST-0026</b> - Competence management for LNG and alternative-fuel personnel              | BV generally relies on IMO STCW/IGF compliance and training schemes rather than a direct class standard equivalent                                                                    | LR Training & Certification schemes; no direct LR class-rule equivalent to ST-0026                                                                                                         |
| <b>DNV-ST-0012</b> - Competence requirements for battery and electrical energy storage systems | BV training and approval programs; no widely used standalone class standard directly equivalent                                                                                       | LR Academy and competency frameworks; no direct rules equivalent                                                                                                                           |
| <b>DNV-CG-0660</b> - Battery power safety philosophy                                           | BV Guidance Notes and Rules for Battery Systems (often issued as Guidance Notes/NI documents rather than Rule Notes)                                                                  | LR battery guidance documents and risk-based design assessments; no exact counterpart                                                                                                      |
| <b>DNV-CG-0667</b> - Carbon Capture & Storage (CCS) onboard ships                              | BV CCS notations and guidance documents for onboard carbon capture projects                                                                                                           | LR ShipRight and CCS guidance notes for onboard carbon capture                                                                                                                             |
| <b>DNV-CG-0156</b> - Methanol carriage and methanol fuel safety                                | <b>NR670 Methanol and Ethanol-Fuelled Ships</b>                                                                                                                                       | <b>LR-GN-047 Guidance Notes for Methyl and Ethyl Alcohol Fuels</b> together with LR-RU-012 Appendix LR1                                                                                    |
| <b>DNV-RP-G105</b> - LNG bunkering safety and risk assessment                                  | <b>NR620 Bunkering Ships</b> (LNG, ammonia, methanol bunkering)                                                                                                                       | LR guidance on LNG bunkering and alternative-fuel operations under LR-RU-012 and associated guidance notes                                                                                 |
| <b>DNV-RP-F112</b> - Hydrogen induced stress cracking (HISC)                                   | BV materials qualification guidance for hydrogen service and offshore equipment (project-specific documents rather than a single RP equivalent)                                       | LR materials and hydrogen-fuel guidance; hydrogen requirements incorporated into LR alternative-fuel rules and hydrogen appendices                                                         |
| <b>DNV-ST-F101</b>                                                                             | <b>NI 565 / offshore pipeline and subsea system rules</b> , BV offshore pipeline standards (project dependent)                                                                        | LR Energy pipeline design and integrity standards;                                                                                                                                         |

# Key takeaways and closing message

---

Maritime GHG reduction is **necessary** — and **achievable** through an integrated transition.

*Momentum is building, but pace depends on technology maturity, fuel availability and operational readiness.*

## THREE MESSAGES TO CLOSE ON

---

1

### Action now

Hard-to-abate does not mean wait; complexity should shape the roadmap.

2

### Integrated mix

No single solution carries the sector; efficiency, operations and new fuels must work together.

3

### Manage evolving risks

As transition pathways mature, safeguards, competence and emergency readiness must be reviewed and updated.

**Closing message:** **act now**, scale pragmatically, and **manage evolving risks**.

---

WHEN TRUST MATTERS



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+44 7807690644

[www.dnv.com](http://www.dnv.com)



Emergency Response / Wreck Removal / End of Life  
Fate of Vessels powered by and/or containing  
'Alternative Fuels'

Deep Tek Limited / D'Arcy Thompson Simulator Centre Limited

2026.06.24

# Marine Salvage and Wreck Removal as a Global Industry

The very existence of the global marine salvage industry, insurers and P&I Clubs is evidence that there are marine casualties even with modern, highly regulated shipping regimes.



*List of Car Carrier  
Casualties:  
[https://en.wikipedia.org/  
wiki/List\\_of\\_roll-on/roll-  
off\\_vessel\\_accidents](https://en.wikipedia.org/wiki/List_of_roll-on/roll-off_vessel_accidents)*

# mv Torrey Canyon



*Oil Carrier, 'Torrey Canyon'  
(18.03.1967)  
Scilly Isles, Cornwall*

*Courtesy of The Independent*

SIMULATION-LED™



## **LIFE: The Salvor**

The Dutch family company, Wijsmuller responded under a 'No Cure/No Pay', Lloyds Open Form Agreement. Salvage Master, Captain Hans Stal boarded the stranded tanker with his team to try to pump out ballast, patch damage, and refloat the vessel. During those efforts, an explosion occurred in the engine-room area. Several salvors were injured, and Stal suffered fatal injuries, dying before he could be evacuated to hospital.

## **PROPERTY: mv 'Torrey Canyon'**

Unlike the sinking of RMS Titanic, which altered the regulatory, industrial and societal mindset with regard to the infallibility of designers, builders and owners and safety of life at sea in a unified fashion; the grounding of the 'Torrey Canyon' left the underlying issue – innovation and change within the shipping industry, without consideration of salvors' requirements to be able to respond at speed, with the equipment, training and capacity required.

## **ENVIRONMENT: International Tanker Owners Oil Protection Fund (ITOPF)**

In fairness, the International Tanker Owners Oil Protection Fund (ITOPF) was formed, initially to handle the claim (at a time when environmental compensation law had not caught up with industry).

# Must History Repeat Itself?



SIMULATION-LED™



## Alternative Fuel Technologies under development/in use

- ☐ Nuclear
- ☐ Hydrogen
- ☐ Carbon Capture
- ☐ Methanol
- ☐ Ammonia
- ☐ LNG
- ☐ BioFuel
- ☐ Electric

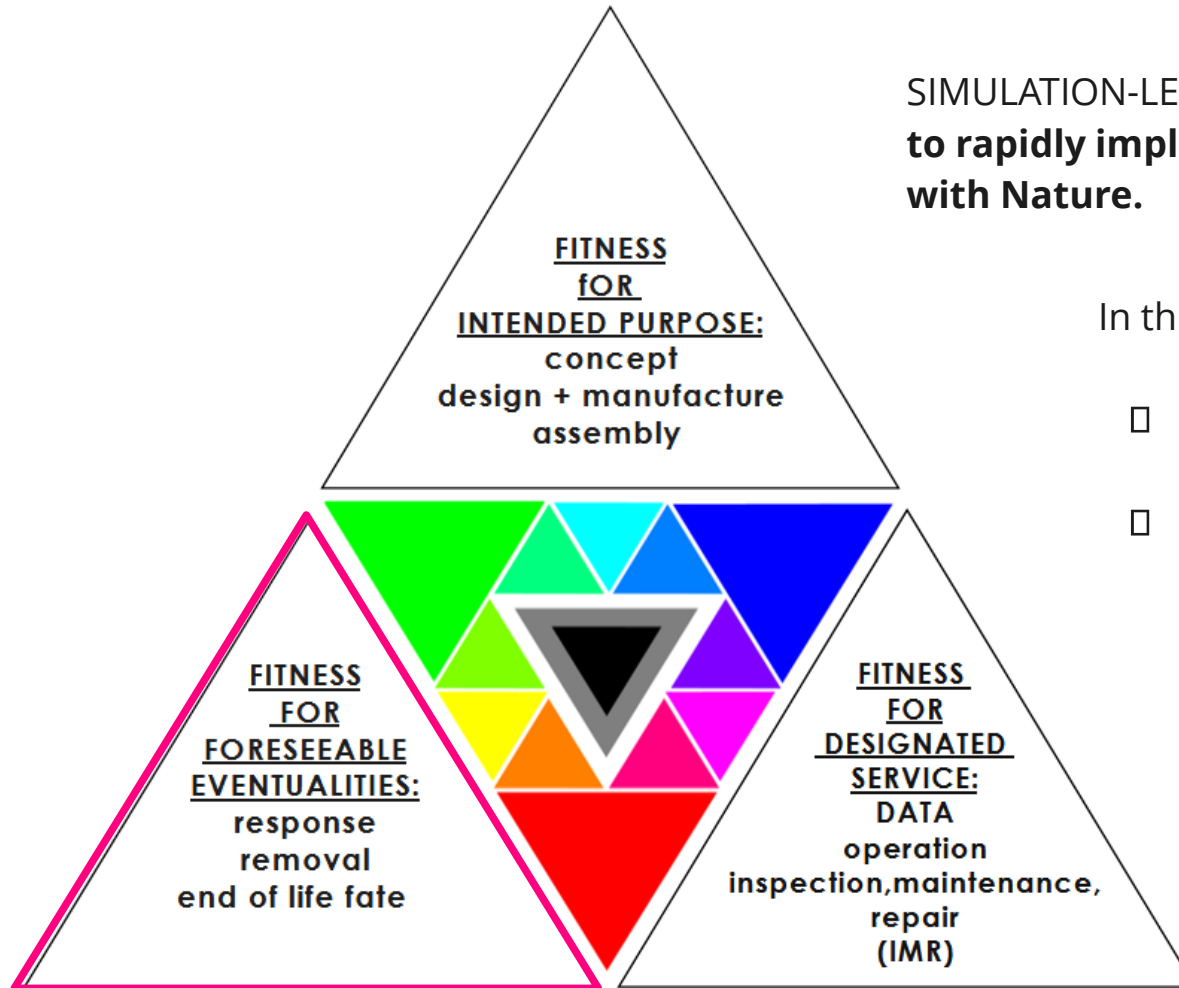
<https://www.lr.org/en/services/maritime-training/technical-and-operational-efficiency/alternative-fuels-course/>

# 'Fitness for...' a holistic, lifeTIME Approach

SIMULATION-LED™



SIMULATION-LED™ as a generic methodology  
**to rapidly implement innovation and change in balance  
with Nature.**



In this diagram the following are embedded:

- ❑ key requirements of Principles-Based Design and Development; and the
- ❑ protection of LIFE, PROPERTY and the ENVIRONMENT are embedded.

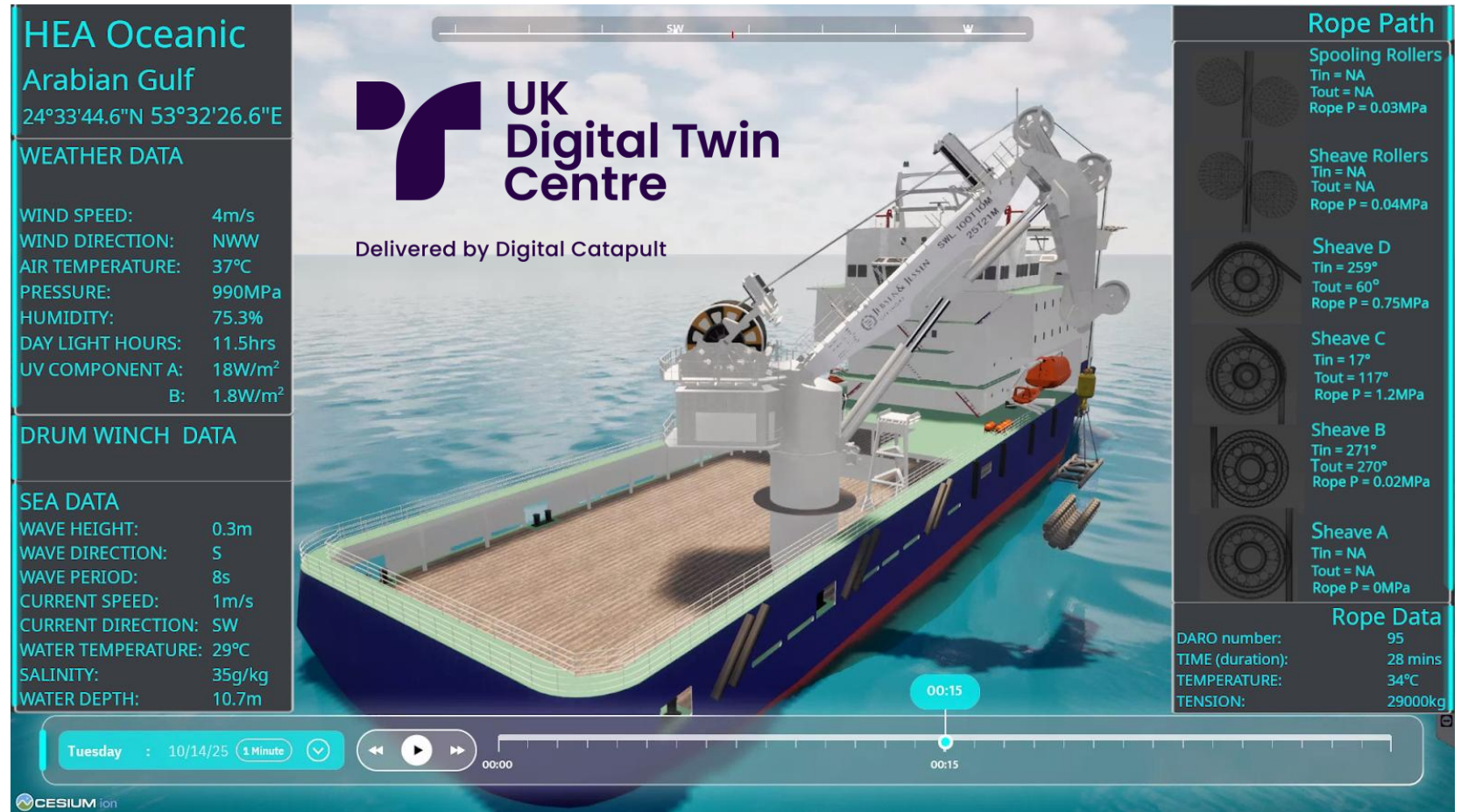
The TIME (of day and/or season, and length of period over which FUNCTION is to be delivered, in a PLACE, or PLACES, needs to be considered from the outset. This capability is built into the sustainaVERSE™

# sustainaVERSE™ platform as a integration tool from CONCEPT



HMPE

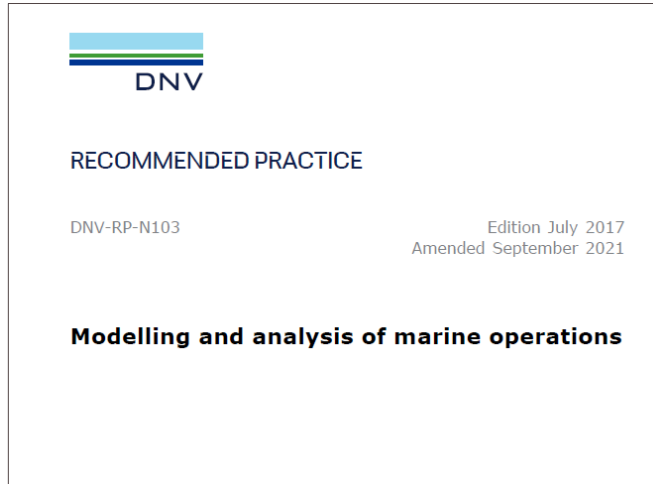
(which is weightless in water) replaces steel  
as the strength member



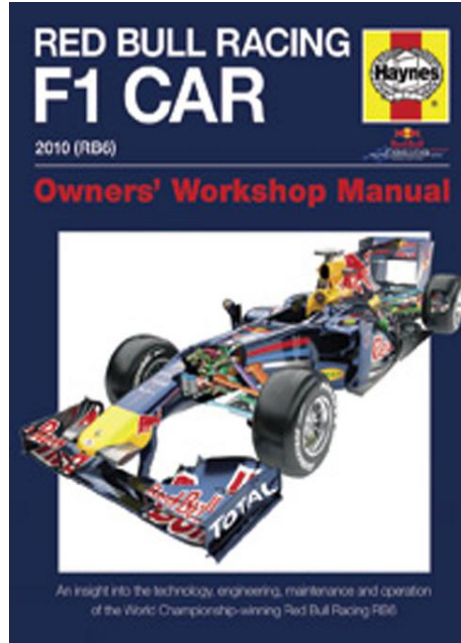
Ability to predict remaining rope Safe Working Life (SWLi) in operation, is essential for  
Class Society certification.

Assurance that Equipment will deliver Function in Service essential for investment and insurance

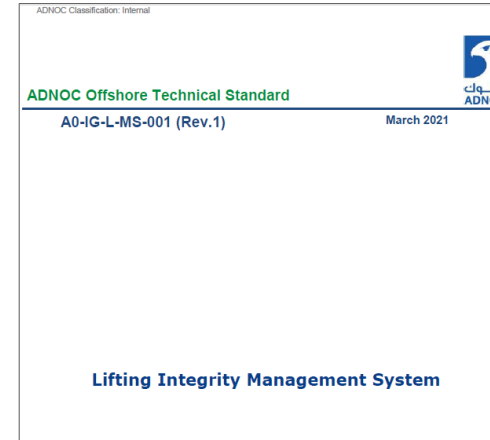
# TAKEAWAY: Implementing Innovation is a Complex Task



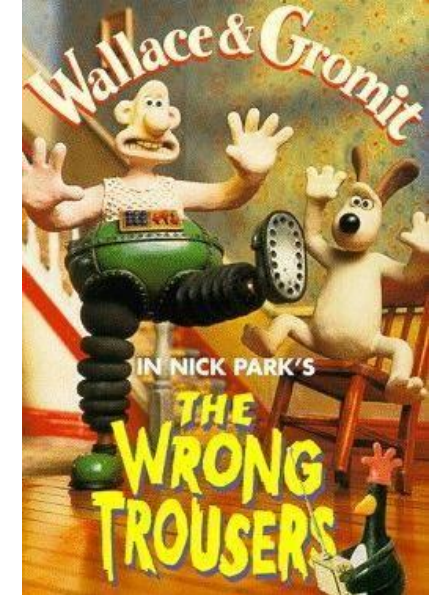
***Reliable Data are a 'lifeblood'.  
They are difficult to secure, and time-  
consuming and expensive to  
Quality Assure***



***Building an integrated  
engineering Team, and  
achieving effective  
communication is essential –  
we need to aspire to be a 'Red  
Bull' in our own domain***



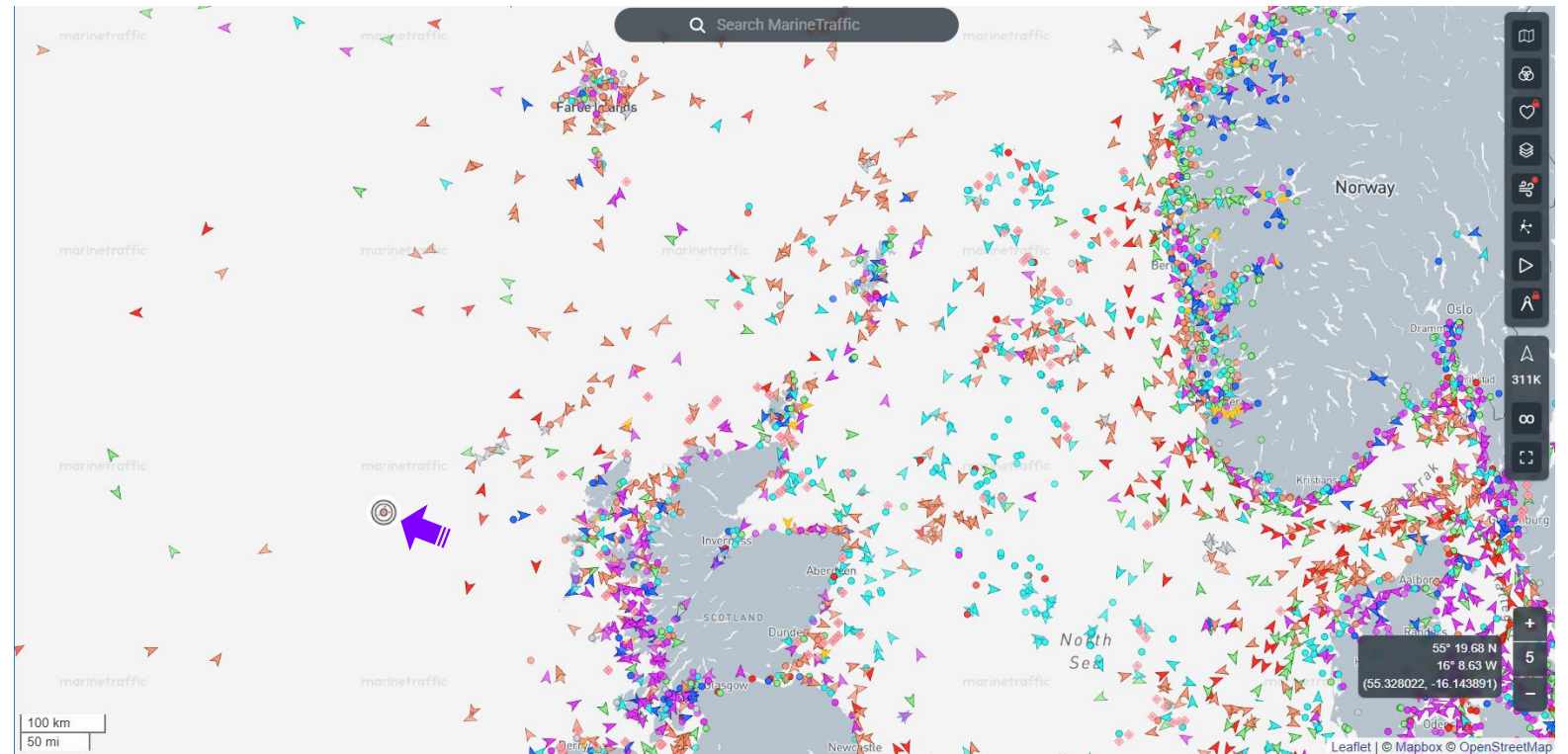
***National and Industry  
regulations are often  
proscriptive***



***As well as the  
commercial imperative  
being to deliver the  
'RIGHT TROUSERS'***

# Application to Salvage / Wreck Removal

*'Felicity Ace' as a first reference model to ask the question - what difference to the preparedness for and the scale of emergency response, would fuel, place, vessel type and cargo necessitate?*



*Using models that can be placed in any part of the world, and which can be made to behave as if they were actively acted on by environmental forces, we create a forum in which domain expertise, in the form of hindsight, insight and foresight can be better utilized.*

# Traversing Domain Expertise across lifeTIME

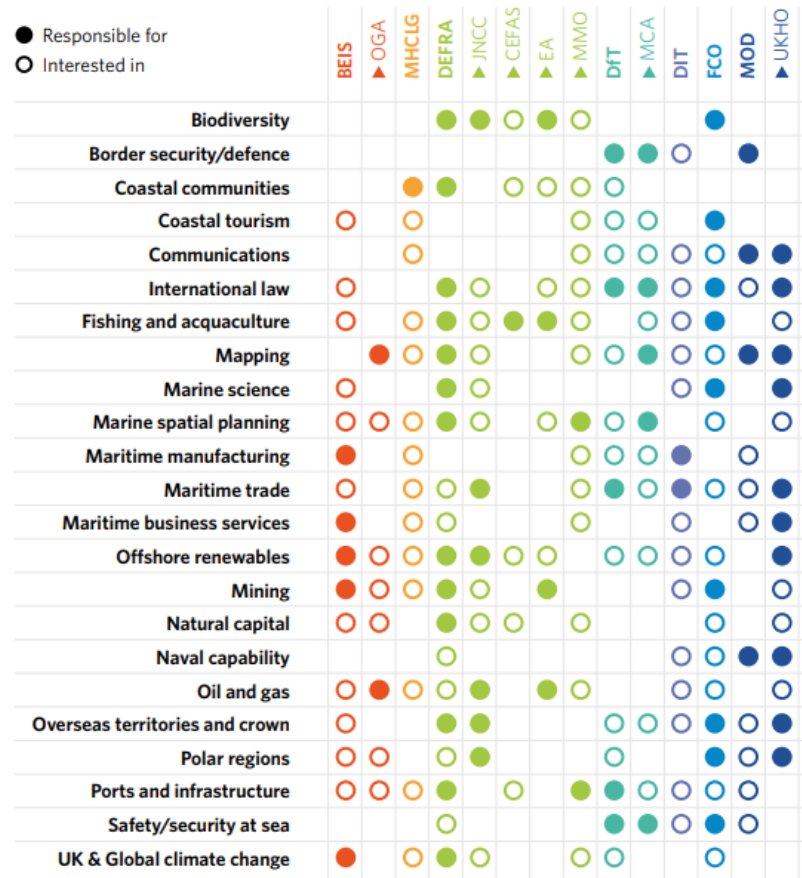
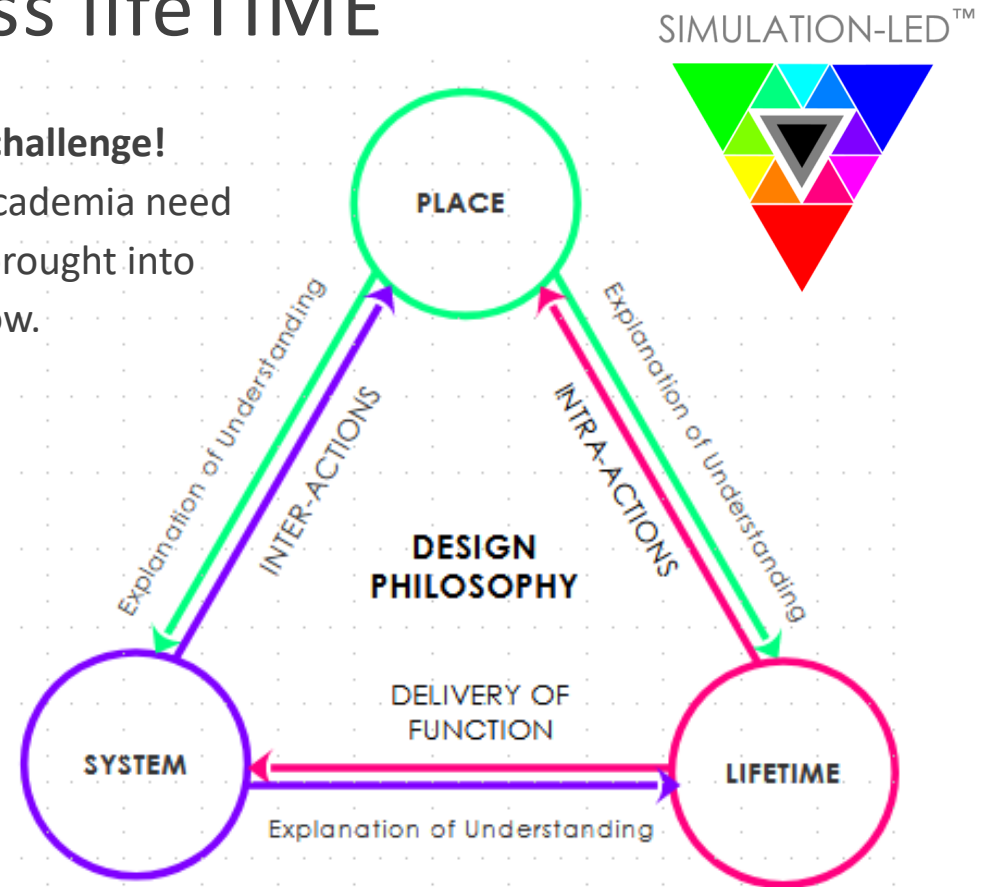


Figure 37, Foresight Future of the Sea Report, 2018  
<https://assets.publishing.service.gov.uk/media/5afab2f440f0b622e060e2b7/foresight-future-of-the-sea-report.pdf>

This is a huge challenge!

Industry and Academia need to be actively brought into the process, now.



Engineers, Harbour Masters, Insurers, Financiers, Chemists, Biologists, Ecologists, Thermodynamicists. Anthropologists etc., etc. in depth knowledge from many diverse disciplines needs to be brought into 'Fitness for Foreseeable Eventualities' debate, in a way that addresses fragmentation

# Useful Equitable Commercial Instruments and Mechanisms

LOF 2020



## LLOYD'S STANDARD FORM OF SALVAGE AGREEMENT (Approved and Published by the Council of Lloyd's)

### NO CURE - NO PAY

|                                                                                                 |                                                                                                                                                                                                                                            |
|-------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Name of the salvage Contractors:<br><br>(referred to in this agreement as "the Contractors") | 2. Property to be saved:<br>The vessel:<br>her cargo freight bunkers stores and any other property thereon but excluding the personal effects or baggage of passengers master or crew<br>(referred to in this agreement as "the property") |
| 3. Agreed place of safety:                                                                      | 4. Agreed currency of any arbitral award and security (if other than United States dollars)                                                                                                                                                |
| 5. Date of this agreement                                                                       | 6. Place of agreement                                                                                                                                                                                                                      |
| 7. Is the Scopic Clause incorporated into this agreement? State alternative: Yes/No             |                                                                                                                                                                                                                                            |
| 8. Person signing for and on behalf of the Contractors                                          | 9. Captain<br>or other person signing for and on behalf of the property                                                                                                                                                                    |
| Signature:                                                                                      | Signature:                                                                                                                                                                                                                                 |

*Lloyds OPEN FORM (LOF) can be repurposed for extreme innovation, where innovator takes the risk*

Explanatory Notes for WRECKSTAGE 2010 are available from BIMCO at [www.bimco.org](http://www.bimco.org)

**BIMCO** **ISU** **WRECKSTAGE 2010**  
INTERNATIONAL WRECK REMOVAL AND REMEDIATION SERVICES AGREEMENT (LUMP SUM - STAGE PAYMENTS)  
PART I

1. Place and Date of Agreement

2. Contractor/Place of Business (CL.1)

3. Company/Place of Business (CL.1)

4. Vessel Specifications (CL.1, 2, 3)

(i) Name (ii) Flag

(iii) IMO Number (iv) Place of Registry

(v) Length/Beam/Depth (vi) Maximum Draft

(vii) OT/NT/DWT (viii) Details and Nature of Cargo

(ix) P&I Club/Insurer (CL.10(a)) (x) Any other Vessel Details Applicable to this Agreement

5. Condition of Vessel (CL.2, 3)

6. Position of Vessel and Condition of Worksite (CL.1, 2, 3)

7. Nature of Services (CL.1, 2, 3)

(i) Nature of services:  
(ii) Compliance with orders of competent authorities (see para. 10.1) (to obtain confirmation)

8. Place of Delivery and/or Disposal of Vessel (CL.10(a), 10(b), 10(c))

9. Payments (CL.4, 5(a), 10(a), 10(b))

(i) Lump Sum (in figures and words) (ii) Amount due and payable on signing this Agreement

(iii) Amount due and payable on (iv) Amount due and payable on

(v) Amount due and payable on (vi) Amount due and payable on

(vii) Amount due and payable on (viii) Amount due and payable on

10. Payment Details (CL.10(a))

(i) Currency (ii) Address

(iii) Bank (iv) Account Number (v) Account Name

This document is a computer generated WRECKSTAGE 2010 form printed by authority of BIMCO. Any insertion or deletion to the form must be clearly visible. In the event of any modification made to the printed text of this document which is not clearly visible, the text of the original BIMCO approved document shall apply. BIMCO assumes no responsibility for any loss, damage or expense as a result of discrepancies between the original BIMCO approved document and this computer generated document.

*We use an adaptation of WRECKHIRE, because it protects the innovator and accommodates change*

DNV·GL

STANDARD

DNVGL-ST-E407

Edition March 2016

**Rope based deployment and recovery systems for designated service**

*And use it in tandem with the principles of 'E407, as a generic standard to rapidly implement innovation and change, in balance with NATURE, for the creation of common WEALTH*

# DATA ownership in a Digital 'Knowledge Economy'



Tackling who has access to data, how, when and on what terms, in advance of any incident is an absolute must.

| -4: COMPONENTS | -3: COMP. SYSTEMS | -2: SUB-SYSTEMS  | -1. SYSTEM (VESSEL) | 0. ENABLERS        | 1. ASSET OWNER                                               | 2. DATA INTEGRATOR                                                                          |
|----------------|-------------------|------------------|---------------------|--------------------|--------------------------------------------------------------|---------------------------------------------------------------------------------------------|
| FILAMENT OEM   | DAR SYSTEM OEM    | CRANE SYSTEM OEM | NAVAL ARCHITECT     | OPERATOR           | <b>CONFIDENTIAL</b> – IN HOUSE USE FOR COMPETITIVE ADVANTAGE | STRATEGIC USE OF INTER-ACTIVE DATA, TO CREATE VALUE FROM SYSTEMS OF SYSTEMS APPROACH, IN 7D |
|                |                   |                  | SHIPYARD            | INSURER            |                                                              |                                                                                             |
|                |                   |                  | SYSTEMS INTEGRATOR  | LIABILITY/P&I CLUB |                                                              |                                                                                             |
|                |                   |                  |                     | DATA INTEGRATOR    |                                                              |                                                                                             |
| CERTIFIER      | CERTIFIER         | CERTIFIER        | CLASS               | ASSURER(S)         | ASSURER(S)                                                   | DATA ASSURER(S)                                                                             |

*DATA are combined for viewing against the TIMeline and / or TIMEscale, but otherwise securely held.*

## STATUS

- ❑ Crane System has 5-year certification under DNV-ST-E407
- ❑ Digital Twin of HEA OCEANIC / Crane System / Payload is supporting the development of new,, remotely operated crane system
- ❑ Deep Tek is working with two global classification societies 'o implement innovation
- ❑ Developing 'Fitness for Foreseeable Eventualities as a pillar of SIMULATION-LED™

## NEXT STEPS

- ❑ For Deep Tek/D'Arcy Rope – develop response to waves
- ❑ Build better engagement P&I Clubs
- ❑ Bring in specific salvage industry concerns to engage with academic partners, regulators including IMO
- ❑ Use Principles-Based Approach to validate proportionate requirements.

## THANKS

- ❑ to T&T Salvage for sharing reports and information on the 'Golden Ray'; and
- ❑ Durham Energy Institute and the Clean Maritime Research Hub for being a catalyst for this important discussion

## CONTACT

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e: [moya.crawford@darcythompson.net](mailto:moya.crawford@darcythompson.net)

**D'Arcy Thompson Simulator Centre Limited**  
**Walter Bower House**  
**Eden Campus**  
**Guardbridge**  
**St Andrews**  
**Fife, KY16 0US**

# Navigating Decarbonisation

## The Insurer's perspective

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Clean Maritime Assembly

---

Sarah McCann

SENIOR SOLICITOR – EXTERNAL AFFAIRS

25 June 2026



NorthStandard

# P&I Clubs

## What is a P&I Club?



An Association of Shipowners providing third party liability insurance cover



Is a mutual insurer (sharing of risks)



Owned and controlled by their shipowner members



Non-profit making



Exist solely for the benefit of their members



A service provider as well as providing insurance



# P&I marine liabilities

We cover marine liabilities arising from vessel operations including:



**Collisions  
with vessels**



**Damage to fixed  
and floating objects**



**Loss of, or damage  
to cargo**



**Pollution from the  
vessel, or its cargo.**



**Loss of life and injury  
to crew, passengers  
and third parties.**



**Wreck removal**



# What is driving decarbonisation?



**IMO GHG  
Strategy**



**Global and Regional  
regulations**



**Improving  
energy efficiency**



**Environmental and  
social responsibility**



**Innovation  
and market expectations**

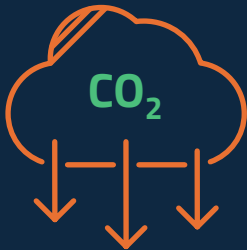


# The role of operational efficiency



## **Operational measures**

can deliver immediate, cost-effective emissions reductions



Can yield  
**significant fuel and emissions savings**



## **Address behavioural inefficiencies**



Enhancing  
**commercial and port performance**



# Different fuels



Biofuel



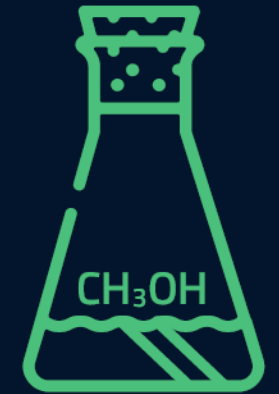
LNG



Hydrogen



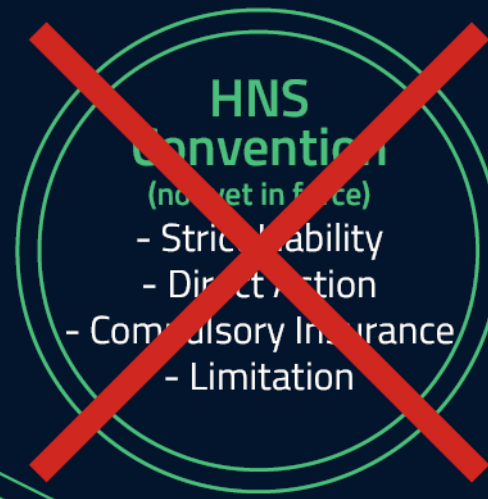
Ammonia



Methanol



# Global liability convention for low carbon fuels



# Supporting our Members

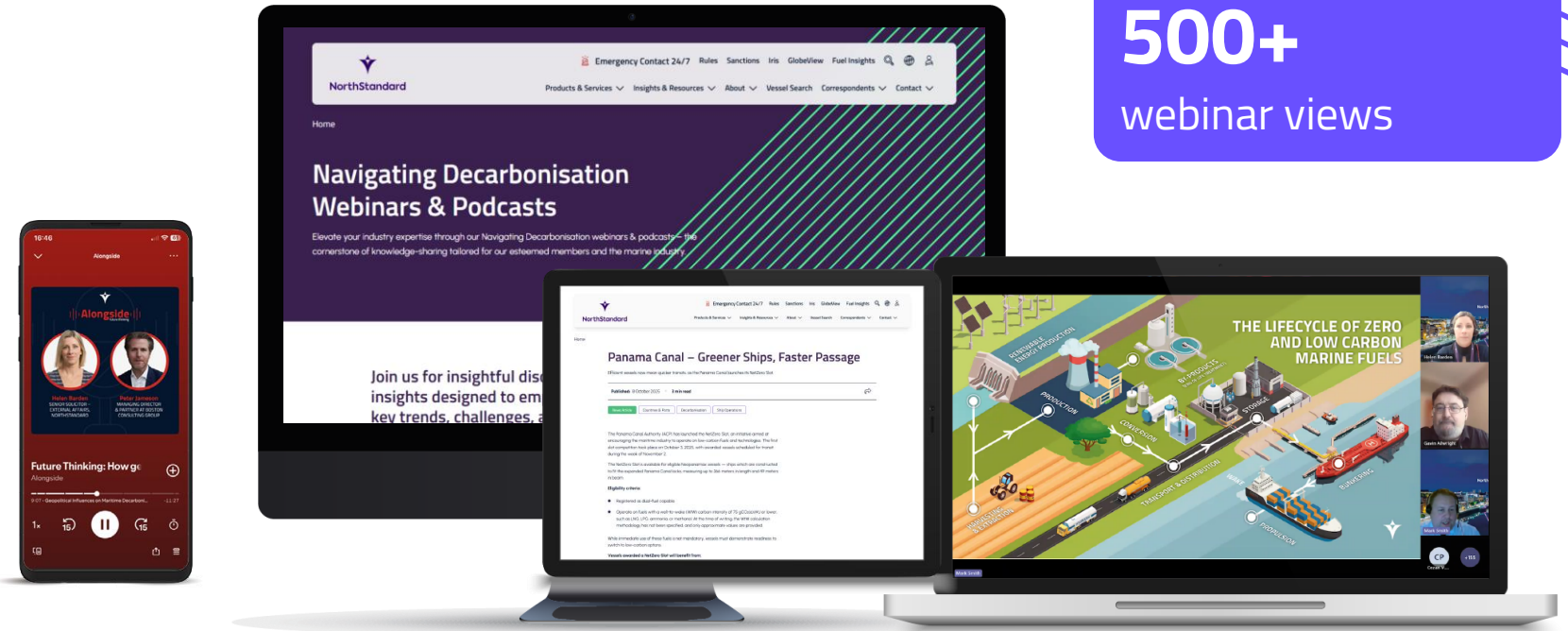
- ✦ Dedicated Expertise Group
- ✦ Operationally focused guidance
- ✦ Loss prevention
- ✦ Contractual implications
- ✦ Industry and policy engagement



# Decarbonisation expertise

## Navigating decarbonisation: Knowledge & insights

- ✦ Webinars
- ✦ Podcast
- ✦ Seminars
- ✦ Case studies
- ✦ Articles
- ✦ White papers



**20+**  
decarbonisation  
resources published

**40m+**  
estimated resources  
reach

**500+**  
webinar views



## Navigating Decarbonisation – The Insurer's Perspective

# Thank You

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**Sarah McCann**

SENIOR SOLICITOR – EXTERNAL AFFAIRS,  
NORTHSTANDARD

Clean Maritime Assembly  
25 June 2026



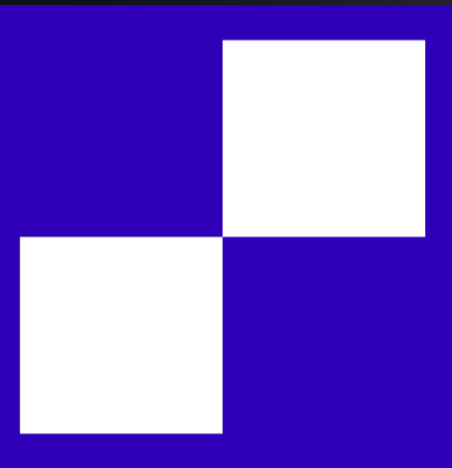
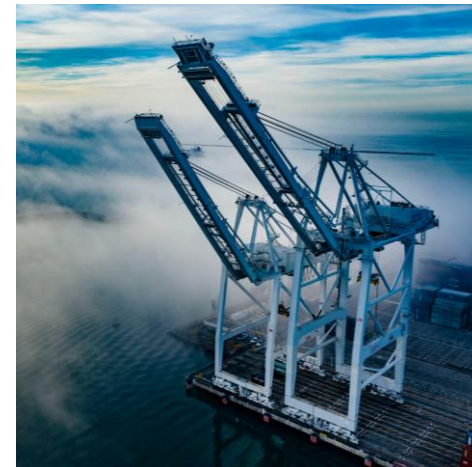
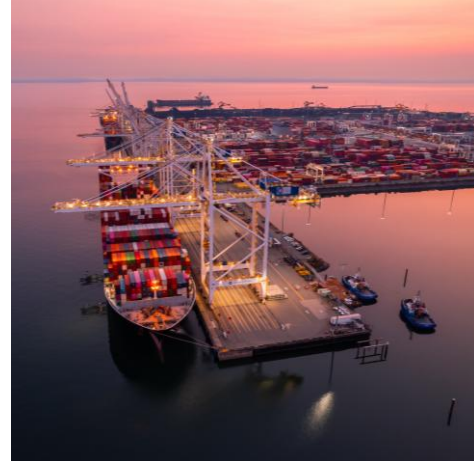
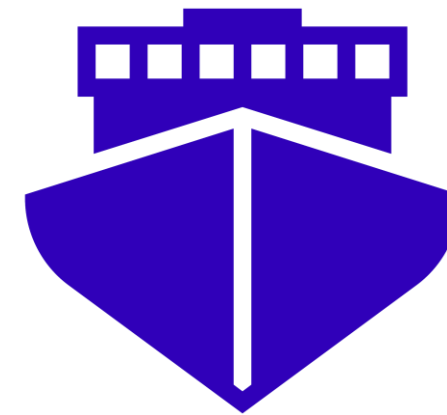
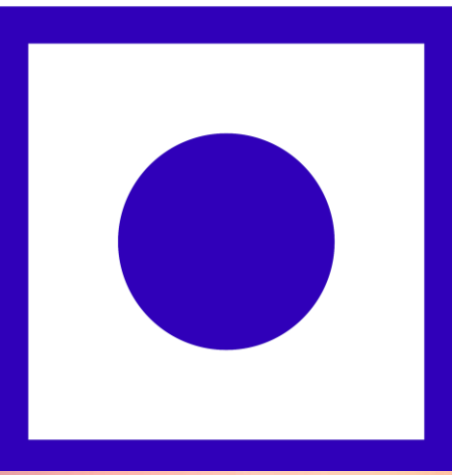
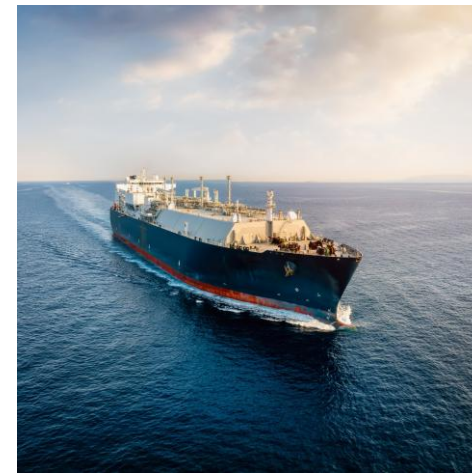
**NorthStandard**



## Session 3

# Decarbonisation in Practice

- Francesco Sandrelli, UK Chamber of Shipping
- David Browbank, Brookes Bell





# Decarbonisation Overview and Safety of Alternative Fuel WG

Francesco Sandrelli, Policy Director (Environment)

26 June 2026, Clean Maritime Assembly, Durham University



1. IMO GHG Reduction - Where we are now;
2. UK (UK ETS) + Offshore (ETS systems);
3. Safety of Alternative Fuels WG;

# Introduction – UK Chamber Members

220 Members, 110 Shipowners, >800 vessels, >18m GT, operating UK and globally

- Passenger Shipping (Cruise & Ferry)
- Dry Trades (Container, Bulk, Short Sea, Aggregates)
- Wet Trades (Tankers, Gas Carriers)
- Offshore & BROA (OSV, AHTS, SOV, Dive, MODU, WTIV etc)
- Harbour Towage
- Ship Operators, Law firms, Insurers, Classification, Marine service providers etc..



# IMO Net Zero Framework



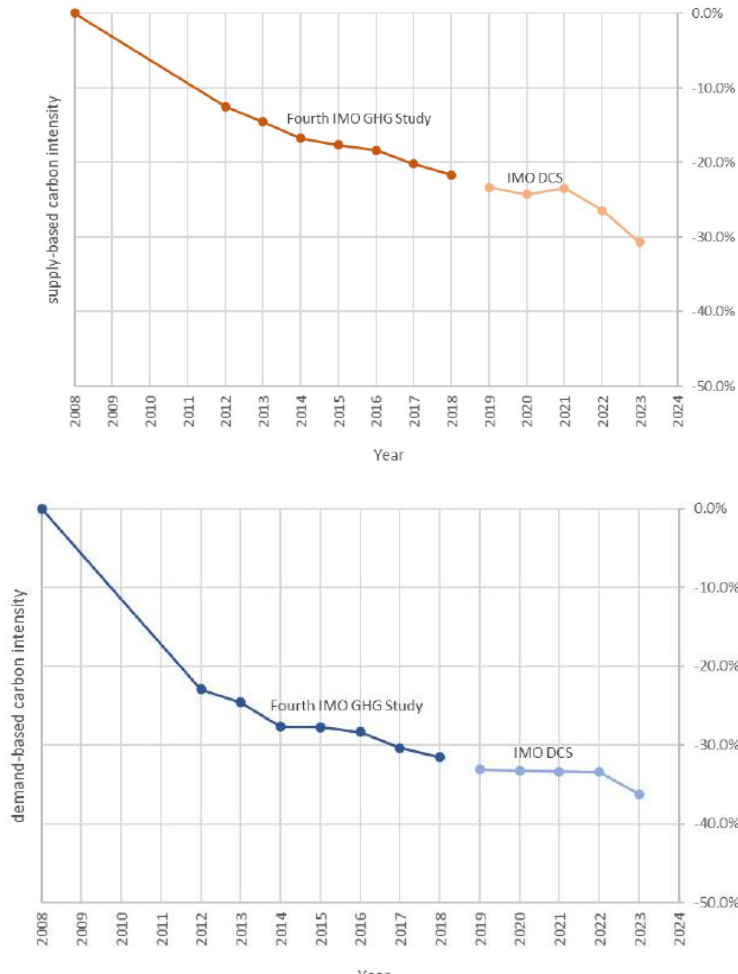
# Where We Are Now

- MEPC/ES.2 – Adjournment;
- MEPC.84 – Additional ISWG-GHG 22 September 2026;
- GHG 23 / MEPC.85 / ES.2 (?) – Adoption (??);
- **4 Circulars MARPOL Annex VI amendments** (6 months circulation - in advanced)
- Situation still very political with Member States split into three broad camps –
  - Those who still want the IMO Net Framework;
  - Those who are here to reject the Net-Zero Emissions by or around 2050;
  - Those who are looking for a compromise;
- Are we talking about Shipping decarbonisation (?)

# Shipping Decarbonisation, Fuels, Energies – INTERTANKO MEPC.84/7/33



# Shipping is Decarbonising – MEPC.83

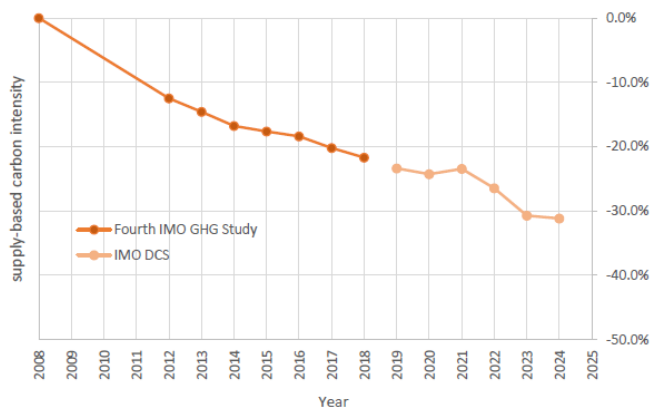


| Year | Anthropogenic CO <sub>2</sub> emissions | International shipping CO <sub>2</sub> emissions | International shipping contribution to total | Reduction of international shipping contribution |
|------|-----------------------------------------|--------------------------------------------------|----------------------------------------------|--------------------------------------------------|
| 2008 | 32,204                                  | 921                                              | 2.86%                                        |                                                  |
| 2012 | 34,959                                  | 775                                              | 2.23%                                        | 22.16%                                           |
| 2013 | 35,225                                  | 761                                              | 2.18%                                        | 23.93%                                           |
| 2014 | 35,239                                  | 764                                              | 2.17%                                        | 24.21%                                           |
| 2015 | 35,380                                  | 780                                              | 2.21%                                        | 22.65%                                           |
| 2016 | 35,810                                  | 811                                              | 2.29%                                        | 19.90%                                           |
| 2017 | 36,573                                  | 838                                              | 2.34%                                        | 18.22%                                           |
| 2018 | 34,793                                  | 830                                              | 2.27%                                        | 20.69%                                           |
| 2023 | 37,400                                  | 656                                              | 1.75%                                        | 38.67%                                           |

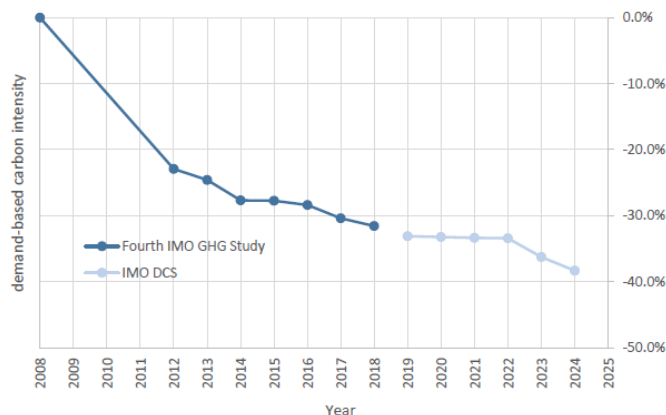
Source: INTERTANKO, MEPC.83/6/13, [Comments on the Report Short-Term GHG Measure](#), MEPC83/6/10

Source: IMO Secretariat, MEPC.83/6, [Report on annual carbon Intensity and efficiency of the fleet \(2023\)](#), [Supply-based \(AER\)](#) UP and Demand-Based (EEOI) Bottom

# Shipping is Decarbonising – MEPC.84



| Year | Anthropogenic CO <sub>2</sub> emissions (Mt) | International shipping CO <sub>2</sub> emissions (Mt) | International shipping contribution | Reduction of international shipping contribution |
|------|----------------------------------------------|-------------------------------------------------------|-------------------------------------|--------------------------------------------------|
| 2018 | 36,300                                       | 830                                                   | 2.29%                               | -22.79%                                          |
| 2023 | 37,300                                       | 656                                                   | 1.76%                               | -40.61%                                          |
| 2024 | 37,600                                       | 692                                                   | 1.84%                               | -37.85%                                          |



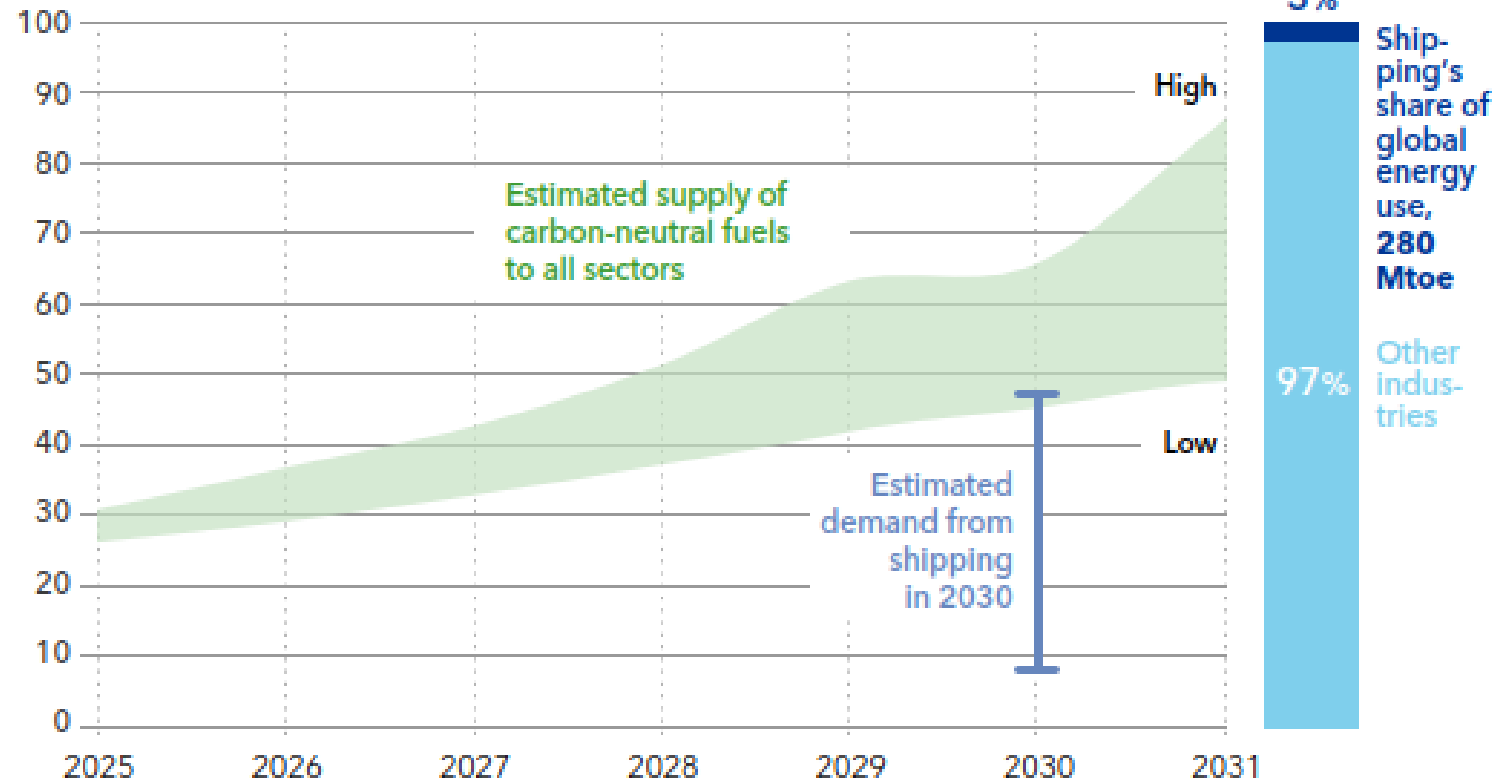
| Year      | Total distance travelled | Total hours underway | Total fuel | Total CO <sub>2</sub> emissions |
|-----------|--------------------------|----------------------|------------|---------------------------------|
|           | nm                       | hrs                  | Mt         | tons                            |
| 2024      | 1,731,903,177            | 150,703,725          | 223        | 691,492,741                     |
| 2023      | 1,638,421,345            | 142,637,834          | 211        | 655,703,233                     |
| 2024/2023 | 1.057056                 | 1.056548             | 1.056872   | 1.054582                        |

Source: INTERTANKO, MEPC.84/7/33, [Assessment of fuel pathways to meet the level of ambition of the 2023 IMO GHG Strategy](#);

Source: IMO Secretariat, MEPC.84/6/2, [Report on annual carbon Intensity and efficiency of the fleet \(2024\), Supply-based \(AER\) UP and Demand-Based \(EEOI\) Bottom](#)

# Energy Transition – Challenges ahead

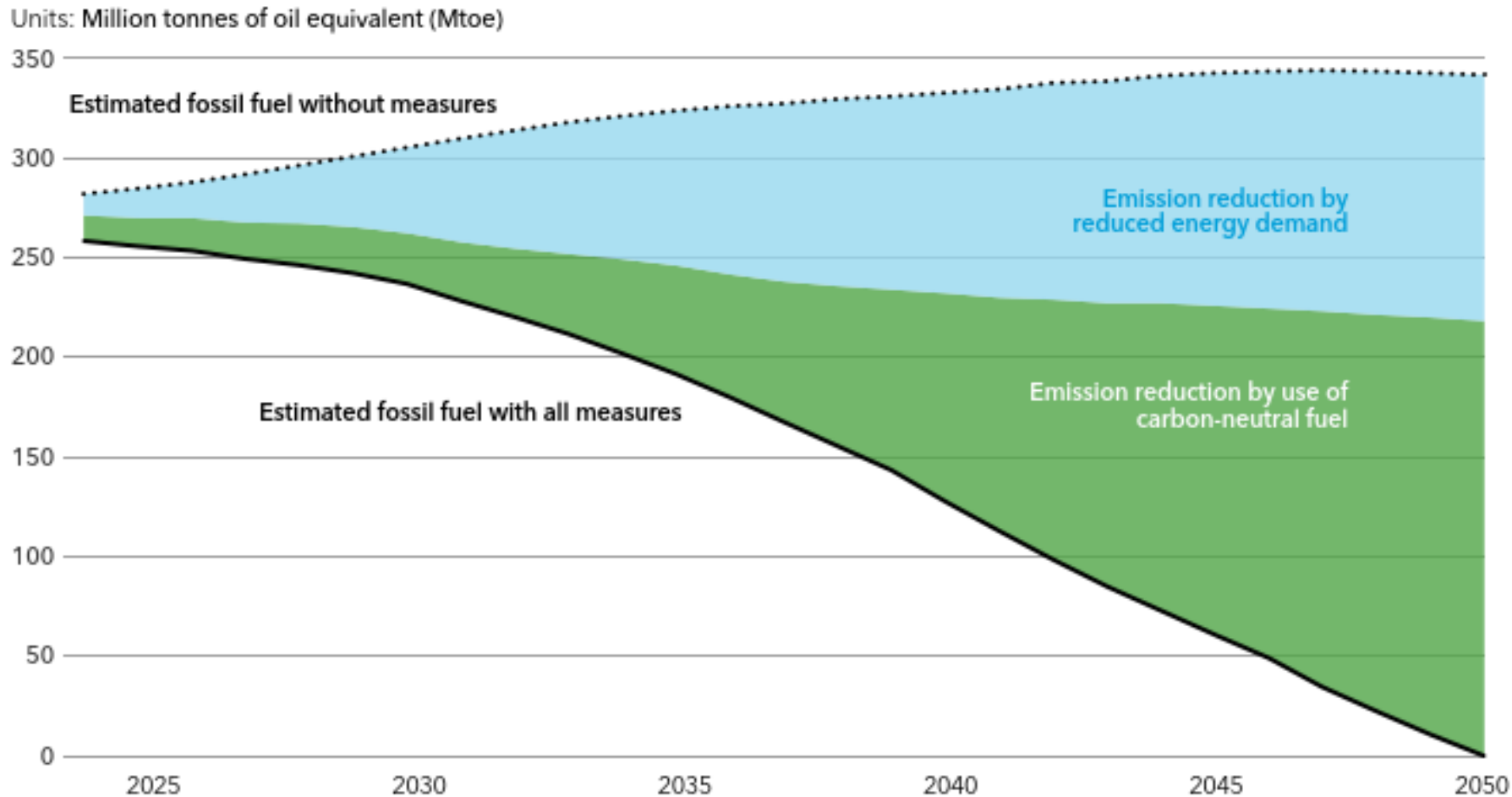
Units: Million tonnes of oil equivalent (Mtoe)



Source: DNV, Energy Transition Outlook 2024 – Maritime Forecast to 2050, DNV

1. Competition with other sectors
2. Capacity development will take time
3. Price likely to be high
4. Infrastructure requirements
5. Shipping needs every solution (multi-layer approach)

# Energy Efficiency is still essential



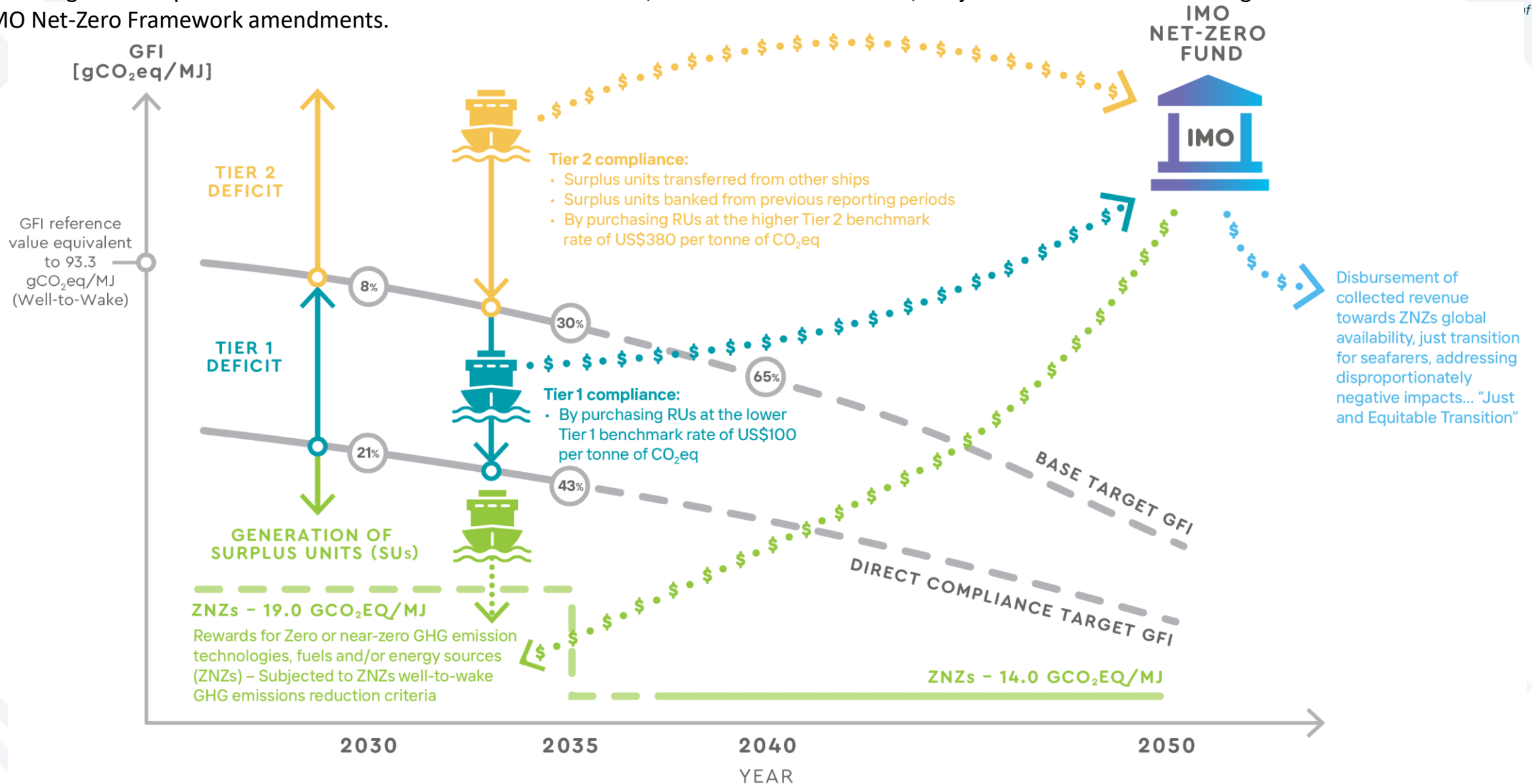
Source: DNV, Energy Transition Outlook 2024 – Maritime Forecast to 2050, DNV

# Four MARPOL Annex VI Proposals (Circular Letters)



# IMO Net Zero Framework - Structure

**Note:** High-level representation of the IMO GFI Tier 2 mechanism, under MARPOL Annex VI, subjected to the criteria and regulations of the IMO Net-Zero Framework amendments.



# Four MARPOL Annex VI Chapter 5 - Summary

|                                       | Submitted by                        | Key changes relative to NZF agreed at MEPC 83                                                                                                                                        | New or revised proposal?                                                   |
|---------------------------------------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|
| <b>NZF as levy</b>                    | Tuvalu                              | Use of the NZF architecture to represent a levy, in addition to a fuel standard which an RU1 GHG price is applied to all GHG emissions                                               | Revised - identical to the concept and specifications submitted to MEPC 84 |
| <b>NZF as is</b>                      | Australia, Canada, UK, South Africa | No changes except to update dates to represent a year's delay in entry into force                                                                                                    | Revised - Identical to the specifications approved in principle at MEPC 83 |
| <b>NZF softer start harder finish</b> | Brazil                              | Change to the GFI trajectories (base and direct), to initially soften the short-term stringency relative to 'as is', but counterbalance this by clarifying higher mid-term ambition) | New– a combination of parameters that had not previously been proposed     |
| <b>LISCR concept</b>                  | Liberia                             | Fundamental redesign, removing all GHG pricing, fund and clarity in the GFI trajectory                                                                                               | Revised – a reworking/modification of the concept submitted to MEPC 84     |

1. [Circular 5215 – Tuvalu](#)
2. [Circular 5216 – Australia, Canada, UK, South Africa;](#)
3. [Circular 5214 – Brazil;](#)
4. [Circular 5213 – Liberia;](#)

Source: Created by Tristan Smith UCL Energy Institute, [IMO Marpol Amendments Options for 85](#), Dated 11/06/2026;

# Circulars – Targets Comparisons and Fuel EU

| Year | Brazil Base (%) | Brazil Direct (%) | UK Base (%) | UK Direct (%) | Tavalu Base (%) | Tavalu Direct (%) | FuelEU Reduction (%) |
|------|-----------------|-------------------|-------------|---------------|-----------------|-------------------|----------------------|
| 2029 | 3               | 3                 | 6           | 19            | 6               | 100               | 2                    |
| 2030 | 4               | 4                 | 8           | 21            | 8               | 100               | 6                    |
| 2031 | 6               | 19                | 12.4        | 25.4          | 12.4            | 100               | 6                    |
| 2032 | 8               | 21                | 16.8        | 29.8          | 16.8            | 100               | 6                    |
| 2033 | 12.4            | 25.4              | 21.2        | 34.2          | 21.2            | 100               | 6                    |
| 2034 | 16.8            | 29.8              | 25.6        | 38.6          | 25.6            | 100               | 6                    |
| 2035 | 21.2            | 34.2              | 30          | 43            | 30              | 100               | 14.5                 |
| 2036 | 25.6            | 38.6              |             |               |                 |                   | 14.5                 |
| 2040 |                 |                   |             |               |                 |                   | 31                   |
| 2041 | 70              |                   | 65          |               | 65              |                   | 31                   |

Source: Created by a Member (Thank you) and Francesco Sandrelli, Dated 16/06/2026;

| Topic                                     | IMO Net-Zero Framework                                                                                                     | New Proposal (Circular 5213 Liberia)                                                                                                                                                                                                | Same? |
|-------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|
| New Chapter 5 MARPOL VI                   | Yes                                                                                                                        | Replaces NZF in same location                                                                                                                                                                                                       | ✓     |
| GFI metric                                | Yes - WtW                                                                                                                  | Yes - WtW                                                                                                                                                                                                                           | ✓     |
| GFI trajectory basis                      | <b>Politically set</b> - fixed, predetermined declining GFI trajectory tied to IMO climate goals.                          | <b>Market-derived</b> - recalculates GFI based on real fuel uptake (GFI Max/Min)                                                                                                                                                    | ✗     |
| GFI registry                              | Yes                                                                                                                        | Yes                                                                                                                                                                                                                                 | ✓     |
| Long-term decarbonization aim             | Yes – <b>aligned</b> to 2023 GHG strategy                                                                                  | Yes – <b>not aligned</b> to 2023 GHG strategy                                                                                                                                                                                       | ✗     |
| 5-year reviews                            | <b>Progress checks</b> - it does not reset ambition.                                                                       | <b>Redefines</b> the whole trajectory every five years based on emerging fuels                                                                                                                                                      | ✗     |
| Compliance flexibility                    | Yes                                                                                                                        | Yes                                                                                                                                                                                                                                 | ✓     |
| Economic GHG pricing                      | Yes – core element                                                                                                         | <b>No</b> – fully removed (Pooling system)                                                                                                                                                                                          | ✗     |
| IMO Net-Zero Fund                         | Yes - global fuel standard plus GHG pricing, with revenues managed through an IMO Net-Zero Fund.                           | <b>No</b> - explicitly rejects any fund or revenue collection mechanism                                                                                                                                                             | ✗     |
| <b>Commercial Viable Fuel criteria</b>    | <b>No</b> - mandates reductions regardless of current fuel availability or cost.                                           | <b>Yes</b> - Affordability, availability, scalability required to determine “evidence-based, market-conditioned ambition.”                                                                                                          | ✗     |
| <b>Tech neutrality (incl. OCCS, wind)</b> | <b>Fuel-centric</b> - rewarding zero/near-zero fuels to be defined. <b>Technologies formula for reward etc.. Not there</b> | <b>Fuel-centric &amp; explicitly recognised</b> technologies (i.e. onboard carbon capture, wind-assisted propulsion, other energy-saving innovations), <b>but formula needs to build up.</b>                                        | ish   |
| <b>Enforcement</b>                        | Through <b>ship certification and economic measures</b>                                                                    | Enforcement is <b>certification-based only (cure period)</b> instead of financially punitive ( <b>penalties</b>  <b>Flag Administration</b> ). | ✗     |

# Conclusion

- Situation is very political – compromise;
- Industry Representatives (no IMO paper);

## Statements MEPC.84 Industry

- IMO CII/DCS, regional systems on-going;
- Shipping is decarbonising;

# UK ETS – Updated -Extract LR/UK CoS event 23.04.2026



# UK ETS – Policy Documents - examples

- ▶ 2024.10.10 - UK ETS Lessons Learned from EU ETS
- ▶ 2025.01.23 - UK CoS replied to the consultation;
- ▶ 2025.03.07 - High Level Letter with International/National Shipowners Associations (11 Other Associations)
- ▶ 23 July 2025 – UK ETS Interim Pending Issues and Initial Summary Document
- ▶ 2025.10 UK ETS next steps to compliance
- ▶ 2026.01 UK CoS replied to the International Voyage Consultation

## UK ETS Lessons Learned from EU ETS

### *Introduction and Purpose:*

The UK Chamber of Shipping (Chamber) is the trade association for the UK shipping industry servicing domestic and/or international markets. The Chamber has over 200 members and associate members, which range from shipowners, ship managers, ship operators, law firms with maritime expertise, insurers, classification societies, to others providing maritime services to the shipping industry.

In March 2022, the UK Government issued a consultation on the proposed expansion of the UK's Emissions Trading Scheme (ETS). In July 2023, the UK ETS Authority published a response to this consultation, indicating its intention to extend the scope of the UK ETS to domestic maritime greenhouse gas (GHG) emissions in 2026.

The Chamber has sought to provide input as and when required and so as to continue to support the government in its efforts, the Chamber has prepared the following document. The purpose of the paper is to highlight key takeaways and recommendations from the perspective of the shipping industry following the extension of the EU ETS to specific international and domestic maritime emissions in January 2024.

It is crucial to highlight that the extension of the EU ETS to the shipping industry has not been without significant challenges, some of which remain outstanding. The Chamber therefore considers there to be an opportunity for the UK Government to utilise the experience of the industry in shaping its own policy and regulatory framework with respect to the expansion of the UK ETS.

Source: Uk Chamber Website, [UK ETS Lessons Learned from EU ETS.](#), accessed 09 June 2025

# Parliamentary Engagement

## Engagement:

- Over 40 Parliamentary Questions tabled across both Houses
- 1 Statutory Committee appearance
- 3 explicit references to the Chamber in UK Parliamentary proceedings.
- 1 Parliamentary drop-in delivered
- 1 cross-party Parliamentary roundtable delivered.
- Commitment from Gov to rethink future ETS engagement, awaiting proposals.



### Question



Lord Berkeley

Labour

Life peer

Lords

To ask His Majesty's Government what representations they have received from shipping operators about concerns about the absence of sufficient shore-power infrastructure, limited port grid capacity and lack of alternative fuels at scale; and what plans they have to address those concerns before the commencement of the UK Emissions Trading Scheme for the maritime sector.

# Current Concerns – 1.Lack of Guidance and FAQs

- ▶ Lessons from EU ETS – Implementing an ETS system is complicated;

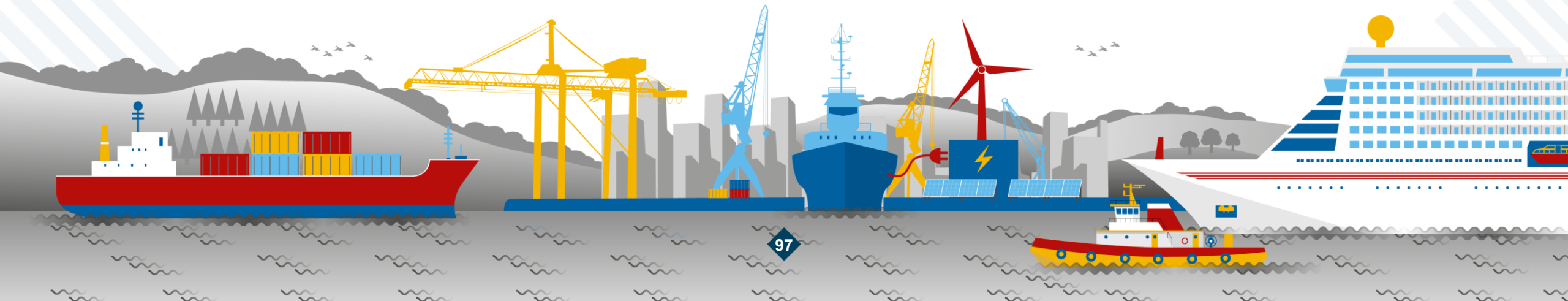
| Area        | EU                                                          | UK                                              |
|-------------|-------------------------------------------------------------|-------------------------------------------------|
| Legislation | 6 MRV EU Regulations / 8 ETS Instruments                    | <u>Greenhouse Gas Emissions Amendments</u>      |
| FAQS        | <u>EU MRV</u> <u>EU ETS</u> <u>THETIS</u> – ship specific   | <u>Participating in the UK ETS</u> (generic)    |
| Guidance    | i.e. <u>Guidance Document no. 1</u> ) etc.. – Ship Specific | HOW TO COMPLY (BEFORE 1 <sup>st</sup> JULY)??   |
| Webinar     | <u>EMSA Webinars</u> <u>Thetis MRV</u>                      | EA generic METS 18/06/2026                      |
| Helpdesk    | <u>fitfor55@emsa.europa.eu</u>                              | <u>etmaritimehelp@environment-agency.gov.uk</u> |
| WG          | Numerous carried out from 2023                              | DfT Planning to establish a WG this year        |

# Current Concerns – 1.Lack of Guidance and FAQs

- ▶ We are collecting Q&As from the industry (Through ECSA , ICS, CLIA etc..) – One central place is needed

| Topic                                    | SI regulatory reference (wh)                | Question                                                                                                                                                                                           | Submitted to EA | Environment Agency Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|------------------------------------------|---------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Notification of change of responsibility | UK ETS Draft SI, Schedule 2A, Part 2, 4.(1) | What is the expectation from Verification bodies regarding this written agreement? What checks need to be made (is it simply the case of presence / absence of a mandate)?                         | 12/03/2026      | There is no role in UK ETS for the Verification bodies in respect of the written agreement. The declaration of delegated responsibility is completed in the EMP workflow as part of the initial EMP application. Any variations affecting an existing delegation and any additional delegations that are made when new ships are included in the EMP are also notified in the EMP workflow. If any material change to the written agreement relating to delegation of UK ETS responsibility occurs, the EMP holder that has included a ship in its EMP on this basis must inform the regulator of the changes in METS within 14 days. When completing the Annual Emissions Report (AER) in METS, the maritime operator will be asked to describe any changes made to its EMP during the scheme year and will need to list all ships in which it has performed maritime activities in the scheme year, whether it was the maritime operator of the ship for the whole scheme year or only part of it. |
| Ships to which this Schedule applies     | UK ETS Draft SI, Schedule 2A, Part 2, 5.(1) | On the understanding that for reporting year 2027 offshore ships will be in scope, when can the industry expect to receive specific technical guidance on this segments inclusion into the UK ETS? | 12/03/2026      | To be answered by DESNZ/ DfT directly as this is a policy issue. The Environment Agency can accept evidence that demonstrates compliance with the ERC criteria. This is a more flexible approach than that adopted under the EU ETS.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Meaning of “port of call”                | UK ETS Draft SI, Schedule 2A, Part 2, 6.(3) | What happens if a UN LOCODE is obtained after the date the order is made?                                                                                                                          | 12/03/2026      | Anything additional relating to future policy to be answered by DESNZ/ DfT. From the regulator’s perspective, the legislation will provide that only UN LOCODEs extant at the date the Order is made are included in the definition of a port.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|                                          |                                             |                                                                                                                                                                                                    |                 | To be answered by DESNZ/ DfT directly as this is a policy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

# Notes on Offshore Vessels (EU and UK ETS)



# Background - ECSA IMCA, EUDA, Paper July 2025

Two key Challenges:

- 1) Vessel Movements;
- 2) Vessel Types;

Two industry Solutions:

- 1) Virtual Port Calls;
- 2) Negative list;

Industry has expressed concerns/solutions since 2023

ECSA Concerns on the inclusion of Offshore Vessels EU ETS Jan 2024;

CE Delft Study, [Extension of EU-ETS to the offshore sector](#) Nov 2023;

UK CoS, [Replied to EU MRV Consultation](#), Sept 2024;

UK CoS, [DNV Offshore Seminar EU MRV Challenges](#), Nov 2024;

UK CoS, [UK ETS Update – Offshore](#), IMCA Seminar, Nov 2025



European  
Shipowners  
ECSA | European Community Shipowners' Associations



July 2025

## Position of European offshore and dredging representatives on the inclusion of emissions from offshore ships in the EU MRV Regulation and EU ETS Directive

### Executive summary

European offshore and dredging representatives, comprising of European Shipowners | ECSA, IMCA and EuDA members, as industry partners, are deeply concerned that the current MRV framework is not fit for purpose in capturing the unique operational characteristics of this segment of the shipping industry. With the EU ETS coming into effect on 1 January 2027 for offshore vessels above 5,000 GT, this inadequacy is expected to result in significant negative impacts, and in the distortion of the level playing field in the sector, placing European offshore operators at a competitive disadvantage.

### Key challenges

- The current list of vessel types used to define the scope of the offshore sector is both incomplete and ambiguous.
- The current definition of a "port of call" does not adequately reflect the realities of offshore operations.

### Proposed solutions

- A comprehensive approach to these issues can be most effectively achieved through harmonisation with the IMO Net-Zero Framework, expected to be adopted in October 2025.
- The scope of the offshore sector should be defined by its activities (cf. IMO IP Code) complemented with a "negative" list of exempted vessels.
- The concept of a "virtual" port should be further investigated and included in the regulatory framework.

### Key challenges

*Incomplete and ambiguous list to cover the offshore sector*

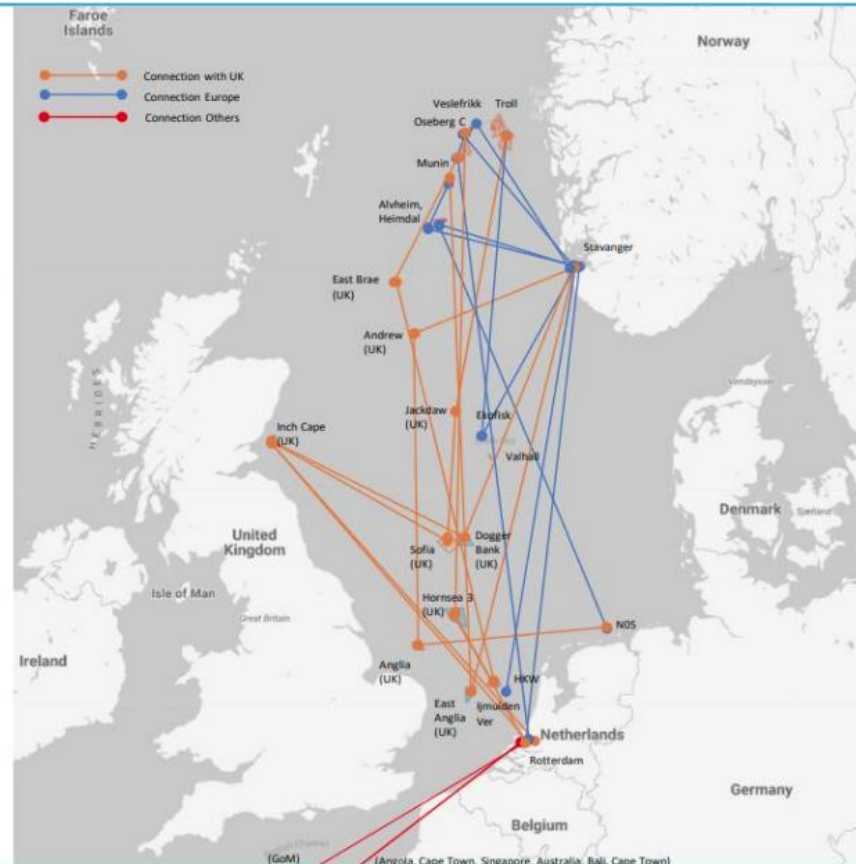
The Commission Delegated Regulation (EU) 2024/3214 of 16 October 2024 on the rules

Source: ECSA, IMCA, EUDA, [Position of European offshore and dredging representatives on the inclusion of emissions from offshore ships in the EU MRV Regulation and EU ETS Directive](#) July 2025, Accessed 10/10/2025;

# ETS Challenges – Vessel Movement

## Vessel Positioning

| Order | Origin Country | Origin Destination |
|-------|----------------|--------------------|
| 1     | UNITED STATES  | UNITED STATES      |
| 2     | UNITED STATES  | UNITED STATES      |
| 3     | UNITED STATES  | NETHERLANDS        |
| 4     | NETHERLANDS    | NORWAY             |
| 5     | NORWAY         | NETHERLANDS        |
| 6     | NETHERLANDS    | NETHERLANDS        |
| 7     | NETHERLANDS    | NORWAY             |
| 8     | NORWAY         | NORWAY             |
| 9     | NORWAY         | NETHERLANDS        |
| 10    | NETHERLANDS    | UNITED KINGDOM     |
| 11    | UNITED KINGDOM | UNITED KINGDOM     |
| 12    | UNITED KINGDOM | NORWAY             |
| 13    | NORWAY         | NORWAY             |
| 14    | NORWAY         | NORWAY             |
| 15    | NORWAY         | NORWAY             |
| 16    | NORWAY         | NORWAY             |
| 17    | NORWAY         | UNITED KINGDOM     |
| 18    | UNITED KINGDOM | UNITED KINGDOM     |
| 19    | UNITED KINGDOM | UNITED KINGDOM     |
| 20    | UNITED KINGDOM | NETHERLANDS        |
| 21    | NETHERLANDS    | ANGOLA             |
| 22    | ANGOLA         | ANGOLA             |
| 23    | ANGOLA         | SOUTH AFRICA       |
| 24    | SOUTH AFRICA   | SINGAPORE          |
| 25    | SINGAPORE      | AUSTRALIA          |
| 26    | AUSTRALIA      | INDONESIA          |
| 27    | INDONESIA      | SOUTH AFRICA       |
| 28    | SOUTH AFRICA   | NETHERLANDS        |
| 29    | NETHERLANDS    | UNITED KINGDOM     |
| 30    | UNITED KINGDOM | UNITED KINGDOM     |
| 31    | UNITED KINGDOM | NORWAY             |
| 32    | NORWAY         | NORWAY             |
| 33    | NORWAY         | NORWAY             |
| 34    | NORWAY         | NORWAY             |
| 35    | NORWAY         | NORWAY             |
| 36    | NORWAY         | NORWAY             |
| 37    | NORWAY         | UNITED KINGDOM     |
| 38    | UNITED KINGDOM | NORWAY             |
| 39    | NORWAY         | NORWAY             |
| 40    | NORWAY         | NORWAY             |
| 41    | NORWAY         | NETHERLANDS        |
| 42    | NETHERLANDS    | UNITED KINGDOM     |
| 43    | UNITED KINGDOM | NORWAY             |
| 44    | NORWAY         | NORWAY             |
| 45    | NORWAY         | UNITED KINGDOM     |
| 46    | UNITED KINGDOM | NETHERLANDS        |
| 47    | NETHERLANDS    | NORWAY             |
| 48    | NORWAY         | UNITED KINGDOM     |
| 49    | UNITED KINGDOM | UNITED KINGDOM     |
| 50    | UNITED KINGDOM | NETHERLANDS        |



## ISSUES

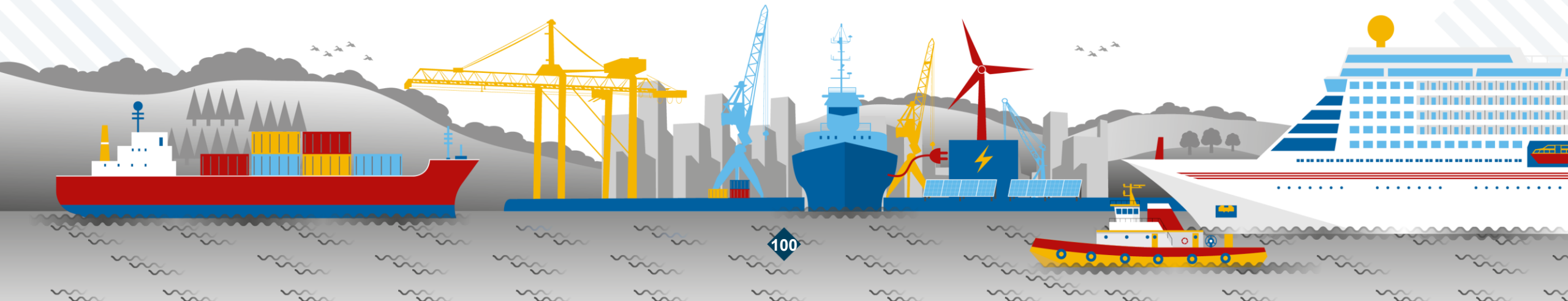
Overcharging ETS allowances between two systems

Possibility for evasion:

- **Market Distortion/Fairness**
- **Clarity/Certainty in rules (between two systems)**
- **Double Counting and Double Payment**

Source: - CE Delft, [Extension of EU-ETS to the offshore sector](#) - offshore construction vessel

# UK CoS Safety of Alternative Fuel WG - 1 Year Activities



# Group Governance – Safety of Alternative Fuel Report

- Chairs:
- Stephen Brown (Shell)
- James Helliwell (V. Group)
- Secretariat - UK Chamber of Shipping
- Francesco Sandrelli
- Paul Markides
- Robert Merrylees

# Year at a Glance – Safety of Alternative Fuel Report

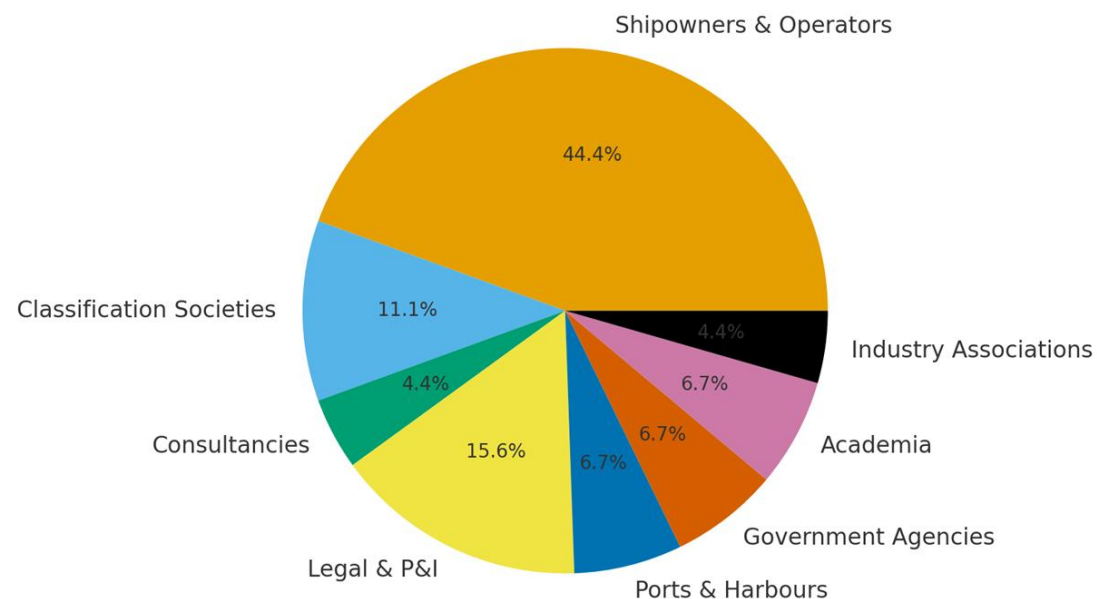
| Metric                           | Achievement  |
|----------------------------------|--------------|
| Workshops Held                   | 5 + 1* WG    |
| Organisations Involved           | 52           |
| Total Participants               | 206          |
| Hours of Activities with Members | 30 (+7-2024) |
| Number of Speakers/Presenters    | 18 (+5 2024) |

9 Key Deliverables: 1 Risk Assessment Template, 5 Initial Risk Assessments, Resource Library, Stakeholder Map, 1 Year Report;

# Stakeholder Engagement – SAFWG Report

- 52 organization involved
- Shipowners and operators: 22
- Classification societies: 5
- Marine consultancies: 1
- Legal and P&I experts: 7
- Port and harbour authorities: 3
- Government departments and agencies: 3
- Academic institutions: 3
- Other shipping associations: 2
- Equipment manufacturers and fuel suppliers: 6

Stakeholder Engagement by Category (2025)



# Stakeholder Engagement – List of Stakeholders

## Shipowners and operators: 22

Shell, V. Group, AngloEastern, BP, Bibby Marine, Calmac, Carnival, CEMEX, Evergreen, James Fisher, J.P. Morgan, MOD, MOL, MSC, Northern Lighthouse Board, Northern Marine, P&O, Purus, Stena Line, Svitser, NYK, Fortescue

- Classification societies: 5 - ABS, BV, LR, RINA, DNV
- Marine consultancies: 1 - Frazer Nash Consultancy
- Legal and P&I experts: 7 -Gard, North Standard, Shipowner Club, (Steamship), Thomas Miller, West P&I, International Group of P&I
- Port and harbour authorities: 3- Forth Port, Singapore MPA, Port of Rotterdam
- Government departments and agencies: 3 - MCA UK, Singapore MPA, UK Health & Safety Executive
- Academic institutions: 3 - Clean Maritime Hub, University of Southampton (SOTON), University of Strathclyde
- Other shipping associations: 2 - ICS, IBIA
- Equipment manufacturers and fuel suppliers: 6

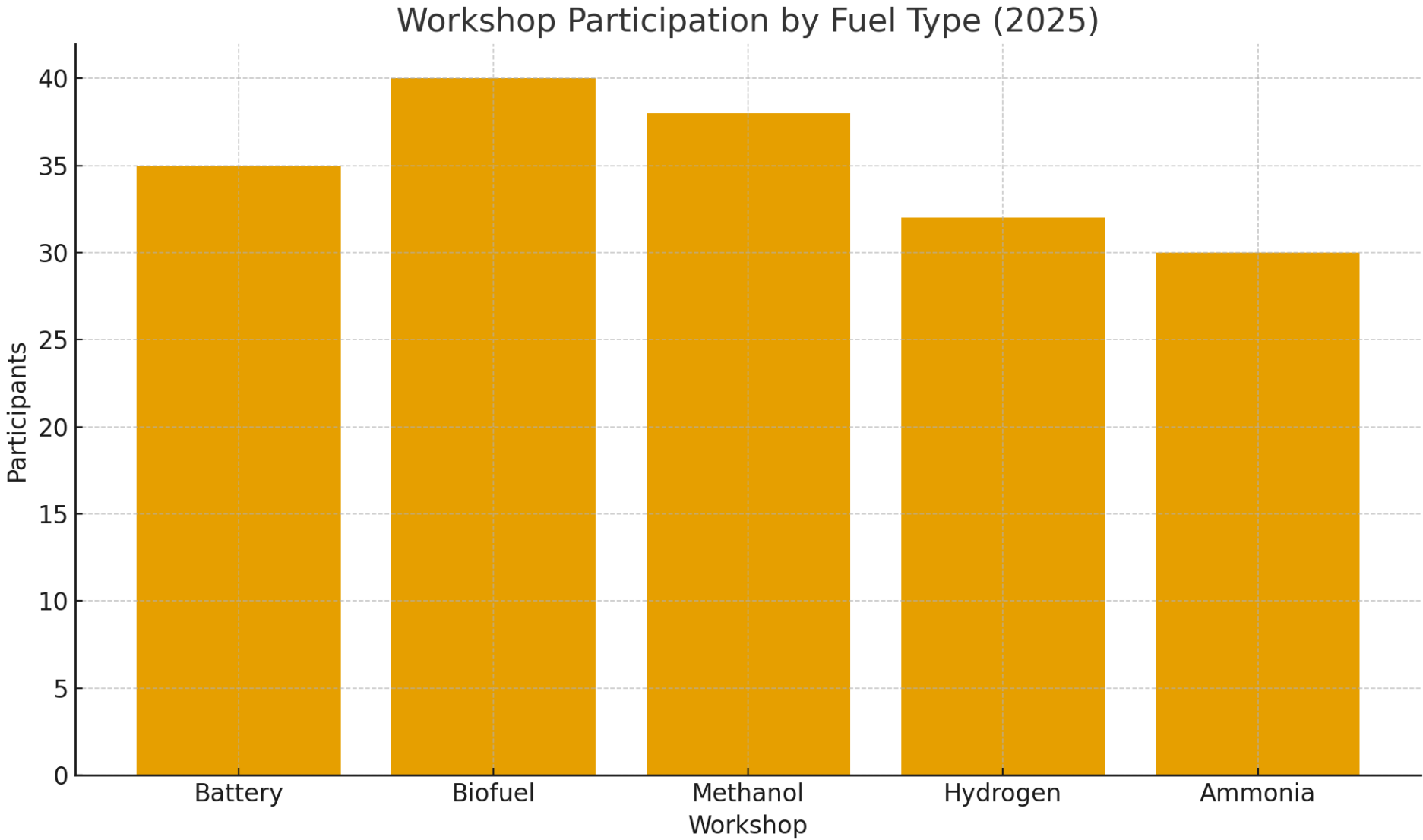
Corvus, Everllence, Wartsila, Alfa Laval;

GiBunkering, Yara;

# Workshop Timelines

| Date       | Events/Workshops      | Key Presenting Organisation                        |
|------------|-----------------------|----------------------------------------------------|
| 30 May 24  | Inaugural Meeting     | Singapore MPA, West of England, IBIA, RINA (Class) |
| 21 Nov 24  | Establishment Meeting | RINA (Class)                                       |
| 11 Mar 25  | Battery Workshop      | Corvus, Shell, Calmac Ferries                      |
| 29 Apr 25  | Biofuel Workshop      | LR/FOBAS, MAN Engine, Glander Bunkering, SVITZER   |
| 10 July 25 | Methanol Workshop     | ABS, Wartsila, V.Ships                             |
| 01 Oct 25  | WG Meeting            | ICS, MOL                                           |
| 07 Nov 25  | Hydrogen Workshop     | DNV, Wartsila, Shell                               |
| 20 Nov 25  | Ammonia Workshop      | Yara, Fortescue, Port of Rotterdam                 |

# Workshop Participation -



# Risk Assessments - Example of Top Hazards

| Top Hazards Some examples                                                |                                                                                                           |                                                                                 |                                                                                       |                                                                                    |
|--------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|
| Battery                                                                  | Biofuels                                                                                                  | Methanol                                                                        | Hydrogen                                                                              | Ammonia                                                                            |
| Thermal runaway due to manufacturing fault/internal cell failure.        | Bunkering unknown biofuel grade risking warranty insurance invalidation.                                  | SIMOPS (cargo + bunkering) increasing likelihood of high-consequence incidents. | Limited trained personnel for operation/repair increasing the likelihood of incidents | Hose rupture during transfer leading to loss of containment and toxic release.     |
| Cooling/ventilation failure leading to overheating and thermal runaway.  | Cross-contamination properties of blends causing water/bacteria, sludging and corrosion                   | Hydroscopic Non-visible methanol flame following loss of containment            | Hydrogen embrittlement from unsuitable materials causing loss of containment.         | Incorrect valve alignment during bunkering leading to toxic release.               |
| Water ingress/condensation leading to short circuit and electrical fire. | Material incompatibility (seals/coatings) leading to component failure and potential loss of containment. | Toxic inhalation exposure following leak/release.                               | Leaks during construction/maintenance causing gaseous or liquid hydrogen release.     | Unfamiliarity of nearby vessels/ports with emergency response escalating incidents |

# Preliminary Risk Assessment - Example Hydrogen

## Safety of Alternative Fuels Working Group Hydrogen Risk Assessment

Scope and limitation: The risk statements and impact/probability ratings on this sheet are preliminary hazard descriptions prepared by the SAFWG. Mitigation measures are intentionally excluded because appropriate controls depend on vessel type, operational profile and company practices. These matrices are intended to inform, not replace, project-level safety cases and design reviews. See the SAFWG Year-1 Report (Legal Disclaimers) and Annex E context sheet for full scope and limitations.

### Hydrogen

Date conducted: 29/04/2025

| Risk ID | Event Description                                                                                                                                                                                             | Associated Activity              | Impact Rating (1-5) | Impact Description                                                          | Probability Rating (1-5) | Probability Description                                                                                                                            | Risk Score | TECOP Category |
|---------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|---------------------|-----------------------------------------------------------------------------|--------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
| 1       | As a result of a lack of hydrogen design standards, poor design decisions are made, leading to the possibility of an unsafe operating condition.                                                              | Vessel design                    | 5                   | Loss of containment, fire and explosion, fatalities.                        | 4                        | Some hydrogen design standards now exist in the industry.                                                                                          |            | Technical      |
| 2       | As a result of the novelty of hydrogen as a marine fuel, limited expertise are available to participate in the risk based certification process, leading to the possibility of an unsafe operating condition. | Vessel design                    | 5                   | Loss of containment, fire and explosion, fatalities.                        | 4                        | There are some expertise in hydrogen safety available in other industries.                                                                         |            | Technical      |
| 3       | As a result of the use of materials not suitable for use with hydrogen, hydrogen embrittlement can occur, leading to a loss of containment.                                                                   | Vessel construction              | 5                   | Loss of containment, fire and explosion, fatalities.                        | 5                        | Hydrogen embrittlement is a known problem and incidents of incorrect material selection in hydrogen systems have occurred.                         |            | Technical      |
| 4       | As a result of failure to account for the negative Joules Thompson effect of hydrogen when designing systems, equipment damage and failure can occur, leading to a loss of containment.                       | Vessel design                    | 5                   | Loss of containment, fire and explosion, fatalities.                        | 5                        | The negative Joules Thompson effect is a known property of hydrogen and incidents have occurred when failing to account for this in system design. |            | Technical      |
| 5       | As a result of inadequate tightening of piping and system connections during construction or maintenance, a liquid hydrogen leak can occur, leading to a loss of containment.                                 | Vessel construction, maintenance | 5                   | Loss of containment, cryogenic burns, brittle fracture of vessel structure. | 5                        | Leaks in piping systems are a common occurrence in industry.                                                                                       |            | Technical      |
| 6       | As a result of inadequate tightening of piping and system connections during construction or maintenance, a gaseous hydrogen leak can occur, leading to a loss of containment.                                | Vessel construction, maintenance | 5                   | Loss of containment, fire and explosion, fatalities.                        | 5                        | Leaks in piping systems are a common occurrence in industry.                                                                                       |            | Technical      |
| 7       | As a result of lack of adequate training for leak detection procedures, a hydrogen leak remains undetected, leading to a loss of containment.                                                                 | Vessel construction, operations  | 5                   | Loss of containment, fire and explosion, fatalities.                        | 5                        | Helium leak testing procedures are novel in the maritime industry and will be unfamiliar to most                                                   |            | Technical      |
| 8       | As a result of the novelty of hydrogen as a marine fuel, there is                                                                                                                                             | Vessel construction, operations  | 5                   | Loss of containment, fire and explosion, fatalities.                        | 5                        | Hydrogen is novel in the maritime industry and there                                                                                               |            | Technical      |

## Year 2 Activities and Deliverables discussion

- Gap Analysis, control and mitigation for Selected Projects;
- Establishment of an Alternative Fuel Accident/Incident Database;
- Additional activities – i.e. Resource Library, Technical Workshops/Webinars;
- Report first Year will be published - End of Month;
- Group Open to Experts – Please contact me;

## CONTACT.

UNITING UK  
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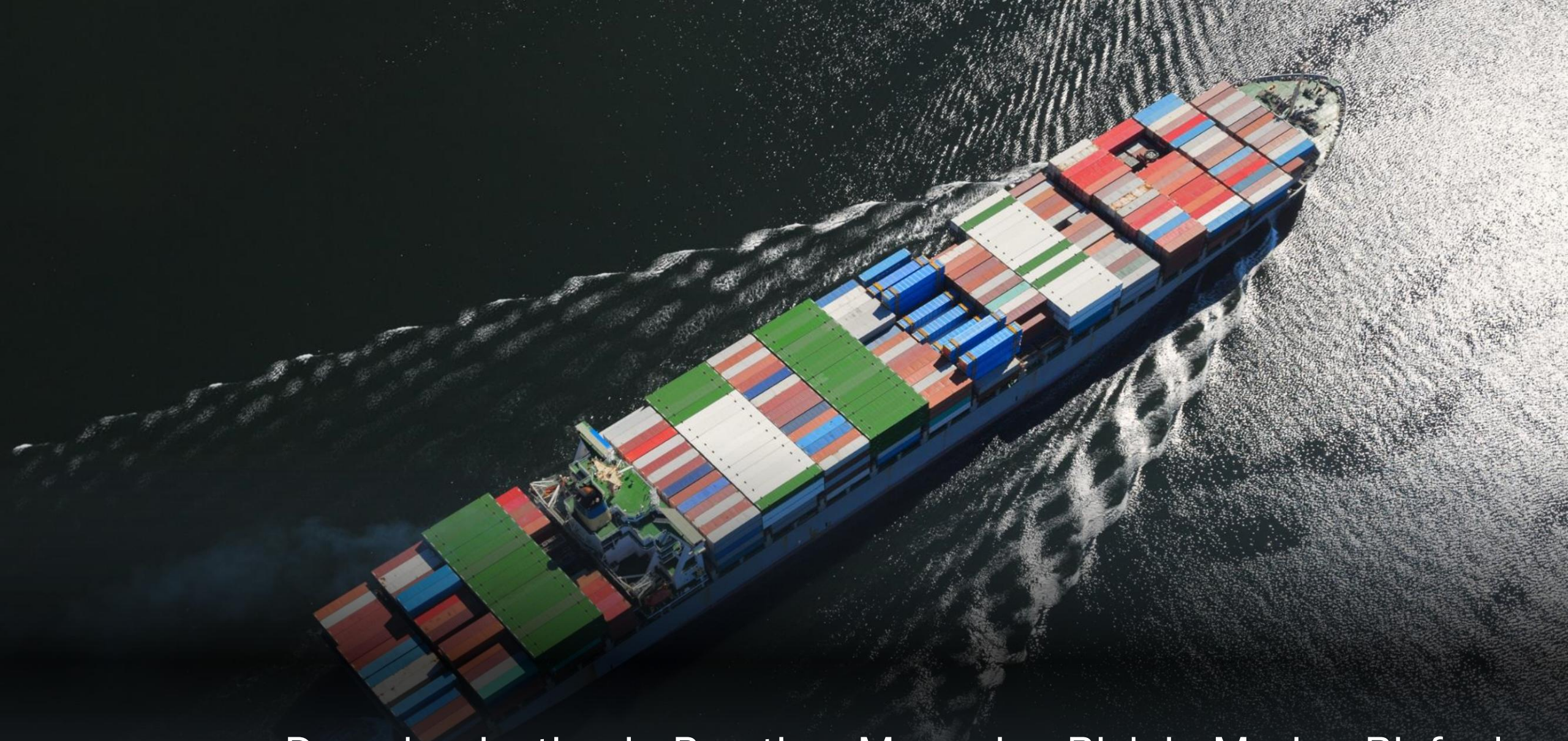
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# Decarbonisation in Practice: Managing Risk in Marine Biofuels

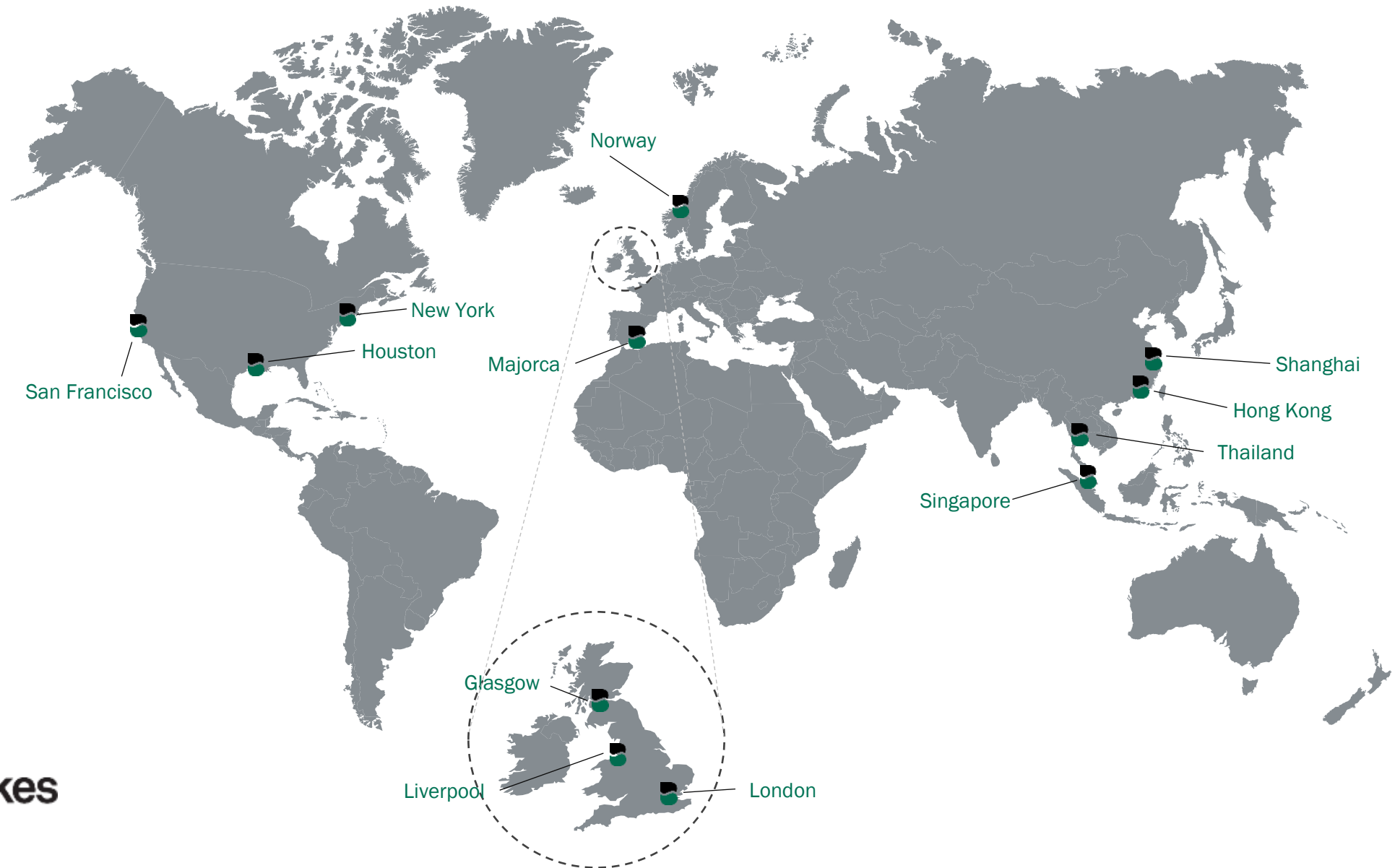
# An introduction to Brookes Bell

# Who is Brookes Bell

- Multi-disciplinary technical and scientific consultancy, serving the marine and energy markets since 1903.
- Global reach including operations in Europe, Asia and the Americas.
- Casualty investigation, forensic analysis, technical dispute resolution, expert witness work and forensic laboratory analysis.



# A global presence



# Our team

Master Mariners

Marine Engineers

Cargo Scientists

Fire Investigators

Fuel Chemists

Materials Scientists

SCRs

Naval Architects

Metallurgists

Paint Consultants

Tribologists

NDT Technicians

# What we do best

Vessel Operations

H&M Claims

P&I Claims

Fuel & Bunkers

Bulk & Liquid Cargo

Personal Injury

Superyachts

Casualty & Salvage

Paint & Coatings

Tribology

New Build Disputes

Design / Simulation

Material Failures

NDT Inspections

Current marine fuels

# Current marine fuels

The marine sector currently utilises a broad range of fuels, with conventional fossil fuels such as HFO and MGO still representing the majority of global marine fuel consumption.

- Fossil fuels – HSFO, VLSFO, ULSFO, LSMDO, LSMGO.
- Biofuels – B5 up to B100.
- LNG / LPG.
- Methanol. Ammonia. Hydrogen.



# Current issues associated with marine fuels

Routine testing to ISO 8217 helps ensure fuels meet defined safety and quality parameters

- SOLAS – Safety of Life at Sea.
- MARPOL (**M**arine **P**ollution) – sulphur, micro carbon residue.
- Fuel stability, sediment and contamination concerns – TSE, TSP, Forensic analysis
- Financial – density.



Biofuels

# Why Biofuels Matter in Practice

## Why biofuels are gaining attention

- The marine industry is transitioning toward lower-carbon fuels.
- Biofuels are increasingly being supplied and used across the global fleet.
- While many operational principles remain familiar, biofuels may behave differently from conventional marine fuels.
- Understanding those differences is becoming increasingly important from both an operational and risk perspective.

## Operational reality

- Biofuels are not a single fuel type
- Fuel behaviour can vary significantly depending on:
  - feedstock
  - production pathway
  - blend ratio
  - storage and handling practices

# Biofuel Does Not Necessarily Mean Biodiesel

## Biofuel (broad / umbrella term)

Marine biofuel discussions and routine screening have historically focused on FAME-type biodiesel blends and traditional FAME markers

## Current marine reality

Modern marine biofuel blends may also contain:

- non-FAME renewable blend components
- upgraded renewable products
- waste-derived or synthetic bio-components

These fuels may behave differently from traditional FAME biodiesel and may not exhibit typical FAME characteristics during routine analysis.

# Feedstocks and Traceability in Marine Biofuels

## Feedstocks

Marine biofuels may be produced from a wide range of renewable feedstocks, including (but not limited to):

- used cooking oil (UCO)
- animal fats
- palm oil mill effluent (POME)
- agricultural residues
- other waste and residue streams

A full list of approved feedstocks and waste-derived materials is referenced within the ISCC materials list and associated certification schemes

# Feedstocks and Traceability in Marine Biofuels

- Animal fats from rendering (cat 1)
- Animal fats from rendering (cat 2)
- Animal fats from rendering (cat 3)
- Brown grease / grease trap fat
- Crude tall oil (CTO)
- Empty Palm Fruit Bunches (EFB) oil
- Food Waste
- Palm Fatty Acid Distillate (PFAD)
- Palm oil mill effluent (POME) oil
- Sewage Sludge
- Soapstock Acid Oil
- Spent Bleaching Earth
- Used Cooking Oil
- Waste/residues from processing of vegetable or animal oil
- Wastewater from ship transport
- Cashew Nut Shell Liquid (CNSL)
- Biogenic fraction of end-of-life tyres
- Residue of FAME end distillation



## Lists of material eligible for ISCC EU certification

(08 October 2025)

| Table 1: Raw material                          |                                                                                                                                                        |                                                                                |                                                 |
|------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|-------------------------------------------------|
| Declaration of material on ISCC EU certificate | Additional information                                                                                                                                 | Classified as waste/residue material in the following EU Member States (or UK) | RefuelEU Aviation ("A") / FuelEU Maritime ("M") |
| Sewage sludge *                                | Sewage sludge is a remainder of the wastewater treatment process. Points of Origins are wastewater treatment facilities. Fats, oils and grease ("FOG") | NL, UK                                                                         | A,M                                             |

[https://www.iscc-system.org/wp-content/uploads/2025/10/ISCC\\_EU\\_material\\_list\\_251008.pdf](https://www.iscc-system.org/wp-content/uploads/2025/10/ISCC_EU_material_list_251008.pdf)

# Feedstocks and Traceability in Marine Biofuels

## Traceability & certification

Certification systems track how fuel is produced and supplied

Two main approaches:

### Segregated supply chains

- Materials are kept separate throughout the supply chain
- What is delivered can be directly traced to its source

### Mass-balance systems

- Materials are mixed during supply (secondary refining)
- Sustainability is tracked on paper, not physically

In mass-balance systems, the sustainability claim may not reflect the actual composition of the fuel delivered

As a result, the fuel onboard may not be identical to its commercial or sustainability description

# Potential Advantages of Marine Biofuels

Marine biofuels are increasingly being considered as a practical transitional fuel within the maritime sector, particularly where existing vessels and infrastructure must continue to operate during decarbonisation.

## Advantages

- Potential reduction in lifecycle greenhouse gas (GHG) emissions
- Can often be used within existing marine fuel infrastructure and engines
- Supports compliance with evolving decarbonisation targets and regulations
- Waste- and residue-derived feedstocks may reduce reliance on fossil fuels
- Increasing availability across major marine bunkering hubs

One of the primary attractions of marine biofuels is that they can often be introduced without requiring a complete redesign of vessels, fuel systems, or bunkering infrastructure, making them a realistic near-term option rather than a future concept.

# Potential Challenges of Marine Biofuels

## Challenges

- Storage stability and fuel ageing
- Compatibility and co-mingling considerations
- Contamination and fuel quality concerns
- Variability between feedstocks, blend components and production pathways
- Increased importance of onboard fuel management and housekeeping
- The variability of biofuel blend components and feedstocks may increase the complexity of technical investigations and root cause assessment

## GHG Performance

- Biofuels may provide lifecycle greenhouse gas (GHG) reductions compared with conventional fossil fuels. However, the overall environmental benefit can vary significantly depending on factors such as feedstock origin, production pathway, land-use impacts, and the robustness of certification and traceability systems.

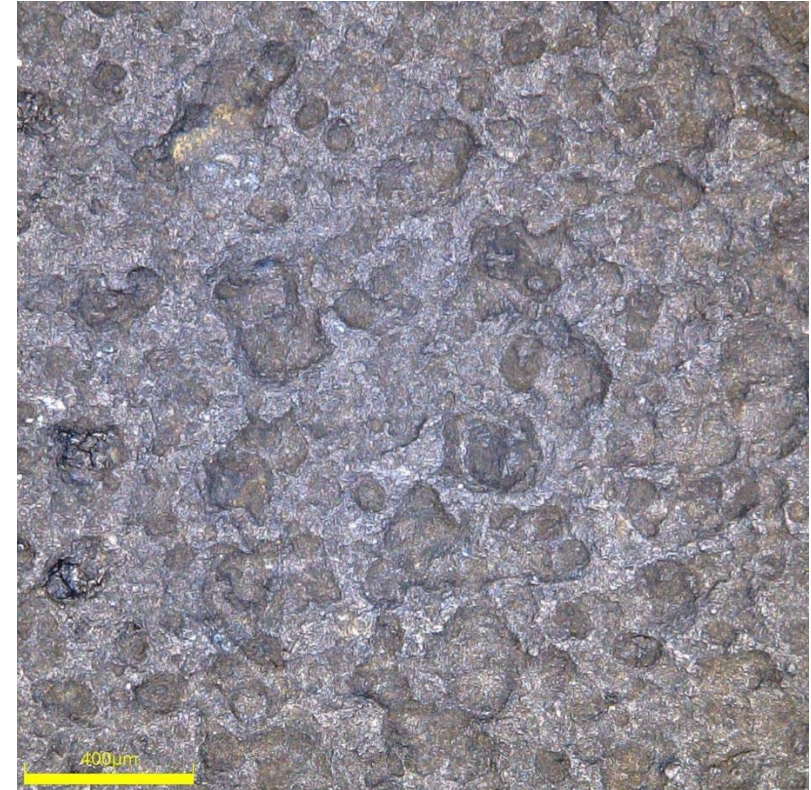
These are not reasons to avoid biofuels, but they do mean that fuel management discipline becomes more important, not less.

## Examples of Operational Fuel Issues

# When fuel chemistry affects performance

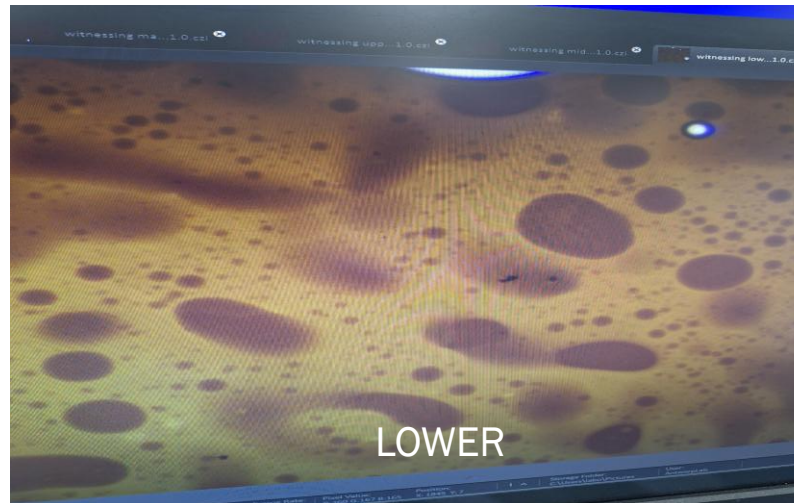


Plunger 1 at 0° position, detail 1 of 5, 140x



Plunger 1 at 0° position, detail 2 of 5, 140x

# On-spec fuel, unexpected behaviour



Safeguards

# Managing Risk in Practice

- Understanding the nature of the renewable blend component is increasingly important
- Certification, traceability and mass balance documentation should be reviewed alongside fuel testing results
- Fuel behaviour may vary depending on feedstock, production pathway and blend composition
- Where operational experience is limited, phased introduction and onboard monitoring may help identify potential issues before wider use
- Early investigation of abnormal fuel behaviour may reduce operational impact
- Combined fuel chemistry and marine engineering assessment may be required in complex cases

Thank you

Questions





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# Thank You

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