Review of EU rules on alternative fuels infrastructure: IMCA response

The International Marine Contractors Association (IMCA) welcomes the opportunity to comment on the European Commission's Call for Evidence regarding EU rules on alternative fuels infrastructure.

IMCA represents more than 800 companies delivering our offshore energy mix, with around 400 based in Europe – spanning contractors, their supply chain, energy companies and project developers. Our aim is to enable the safe and sustainable development of marine energy resources, supporting the EU's ambitions to transition to clean energy while ensuring a resilient blue economy.

Analysis by PA Consulting demonstrates the sector is a strategic asset supporting Europe's energy transition and economic growth:

- Providing over €45bn direct GVA
- Predicted tax contribution of over €15bn in 2025
- Employing 220,000 direct FTEs
- Supporting a wider, indirect cohort of 490,000 FTEs
- GVA per worker is 2.5x the average for the region

IMCA members play a critical role in constructing, installing, and maintaining offshore wind farms, subsea infrastructure, and marine energy systems. With the EU targeting over 300GW of offshore wind capacity by 2050, this will require 30,000 new wind turbines and associated infrastructure, all of which depend on a highly specialised fleet of vessels operated by IMCA members. Europe's marine contractors rely on ports for vessel deployment, maintenance, fuelling, and logistics – ports are where the offshore energy transition begins.

A 'one-size fits all' approach does not work for the marine contracting sector

The industry comprises of a wide variety of specialised vessels engaged in offshore and subsea engineering work, operating on 20 – 30 year lifecycles. Future refuelling solutions depend on several factors such as the vessel type, operational profile, geography, and duty cycle.

Even though these vessels can be grouped into approximately 20 broad categories, their energy demand, load variability, and endurance requirements differ radically between, for example dynamic positioning operations and transit or towing. As a result, the same technology or fuel performs very differently on different vessels operating in different modes. Therefore, emission reduction choices must be profile-specific, not fleet-generic.

Therefore, IMCA recommends:

Support the marine contracting sector access alternative fuels infrastructure

- Deliver fuel visibility maps covering major offshore energy ports.
- Coordinate port development strategies to avoid bottlenecks in major offshore energy hubs (e.g., North Sea, Baltic, Iberian Peninsula).
- Promote offshore recharging infrastructure at wind farms to enable vessel electrification.
- Improve access to alternative fuels at ports servicing offshore energy sectors.
- Support greater onshore power provision and vessel charging at ports to facilitate vessel electrification, this includes access to grid power and ensuring that future port power demands are clear and accounted for by national power grids.

Alternative fuels

IMCA's research suggests that the targets for LNG in maritime ports are not delivering as planned. Data from the European Alternative Fuels Observatory shows that there isn't LNG infrastructure available in all TEN-T core ports, which limits the sector's ability to use alternative fuels.

Furthermore, while LNG and electricity are solutions for some vessels, marine contractor vessels are unique, often one of a kind. Therefore, a one size fits all solution does not work for the industry. Moving forward AFIR should support a variety of low carbon options including methanol together with hydrogen and ammonia through clear and practical regulations.

Therefore, IMCA recommends:

Support the uptake of a variety of renewable solutions for offshore marine vessels

- Promote investment mechanisms that accelerate the transition of marine construction fleets to low carbon solutions.
- Incentivise fuel suppliers and infrastructure developers by supporting/promoting appropriate business cases for the supply of alternative fuels to offshore vessels.
- Ensure targets for LNG are met at all core ports.
- Deliver further alternative low carbon options at ports in the future, such as LNG, hydrogen, ammonia and methanol. Approach and tailoring based on demand, geography and ensuring all maritime players can benefit, rather than a 'one size fits all' approach.