

Written stakeholder consultation on CoR Opinion on “Clean Ports, Clean Seas – Port reception facilities for the delivery of waste from ships”

□The European Committee of the Regions is drafting an opinion on “Clean Ports, Clean Seas – Port reception facilities for the delivery of waste from ships” on the European Commission’s legislative proposal to revise the port reception facilities Directive (COM(2018)33).

The topic is of high relevance to the CoR: Local and regional authorities are important stakeholders for the management of their ports and the reduction of waste in the various regional sea basins is also in the interest of maritime regions.

Therefore the Rapporteur of the opinion, **Mr Spyros Spyridon** (EL/EPP), would like to gather different points of view on the topic in writing. The working document of the rapporteur is available [here](#) and the main questions to stakeholders are summarised below.

If you have any position papers relevant to the subject or any valuable input based on the rapporteur’s questions below, you are welcome to send them to us **before the 1st of May** at coter@cor.europa.eu.

Questions of CoR rapporteur Spyridon to the stakeholders on the revision of the port reception facilities Directive (COM (2018)33).

1. It is important to examine the consequences of the proposed directive to small ports. The costs generated may be too high for the Port authorities and, when transferred to the users, this may result to higher prices, with a possible effect on port competitiveness. This is particularly important for regions closer to non-EU member states, where the Directive will not be applied. Could the ships thus prefer the non-EU ports, where the costs may be lower?
2. The IMO has no definition of the “Green ship”, and the Commission is proposing to define it, according to international certification standards that are used privately. Wouldn’t it be preferable to coordinate with other international stakeholders, in order to define an international definition?
3. Wouldn’t it be preferable to further align the regulation with international standards, and define the obligation to deliver in accordance with the storage capacity of a vessel, and not conditioned on it approaching in a port?
4. The obligation for delivery at every EU port of call, even is Short Sea Shipping, is maintained in the new directive. That means that, short sea

cargo with frequent calls (ie. Ro-Ro) will have to deliver waste, even if, by IMO/MARPOL standards, the generated waste between the two port calls is very limited. Such an obligation is increasing the costs for these ships, which, according to the proposed definition, may not be covered by the exemptions that are given to regular traffic (it will be at the port's discretion).

5. Concerning the application of the indirect fee, mainly in ships engaged in regular traffic, the cost may be too high in periods of reduced traffic, especially during the winter. Therefore, wouldn't it be preferable to see a clearer definition of the Cost Recovery System, mainly the formal interdiction of profit from the activity? This is also combined with more transparency and consultation. Simultaneously, would setting a limit in how much waste is included in the "No Special Fee" be an option in order to reduce costs for regular traffic?
6. The Parliament is proposing to extend the period for revision of the Port Reception Programmes from three to five years. The necessary adjustments should be sufficient in-between. What is your opinion on this?