

Thursday, 18 December 2025

Subject: Urgent need for strengthened EU action to secure Europe's e-fuel leadership in maritime decarbonisation

Dear Executive Vice-President Séjourné,
Dear Executive Vice-President Ribera,
Dear Commissioner Tzitzikostas,
Dear Commissioner Hoekstra,
Dear Director General Kopczyńska,

Europe's maritime decarbonisation leadership faces a decisive moment. The disappointing outcome of the Second Extraordinary Session of the International Maritime Organisation's Marine Environment Protection Committee (ES.2) has underscored the urgent need for the European Union to take proactive steps. EU producers of e-ammonia and e-methanol stand exposed to competition from China, the Middle East, and the United States - all of which are accelerating investment in e-fuel production and infrastructure. Without strengthened EU action, our early industrial advantage could erode while international markets mature.

According to the recently published Sustainable Transport Investment Plan (STIP), decarbonising the shipping industry is estimated to require between €35 and €47 billion in annual investments by 2035. While the majority will come from the private sector, public funding is essential to de-risk first-of-a-kind projects and steer the market toward fuels that align with Europe's priorities. The STIP is a positive step to support the e-fuels industry, but it relies on tools such as the European Hydrogen Bank auctions or the Innovation Fund, which have proven insufficient. We therefore welcome the potential creation of a market intermediary and double-sided auctions. The European Commission must now follow through with concrete actions to boost domestic e-fuels production, enhance energy security and industrial resilience, and maintain Europe's leadership in clean technologies.

To this end, we, the coalition of 20 signatories of this letter, representing clean tech and e-fuels companies, ask the Commission to:

- **Limit the scope of the EU double-sided auctions for maritime to e-fuels only**, as biofuels are already mature or limited in feedstock and could divert resources away from emerging e-fuels.
- **Introduce an EU-level supply mandate for marine e-fuels in European ports, in line with the EU Renewable Energy Directive.**
- **Encourage Member States to dedicate 25% of shipping ETS revenues to support green e-fuels production in Europe.** The cumulative budget of €24 billion between

2030 and 2039 could support an uptake of 5.4 Mt of annual e-ammonia production at a subsidy level of 1000€/toe and make marine e-fuels cost-competitive with biodiesel.

In addition, stronger incentives for e-fuels under the FuelEU Maritime Regulation, combined with clear sustainability criteria and “Made in Europe” provisions, will ensure that public funds strengthen Europe’s clean industrial base.

We therefore recommend:

- **Improve the e-fuel incentive mechanism (multiplier) currently available under the FuelEU Maritime Regulation**, to ensure it reflects the full benefits of renewable fuels of non-biological origin (RFNBOs) and stimulates market demand. This could be done by applying multipliers *both* to the ship and pool levels in the GHG attained formula.
- **Increase the 2% dedicated RFNBO use subquota** to provide a clear, stable signal to investors and ensure the development of a competitive European e-fuel market, and remove the conditionality based on 1% uptake.
- **Incorporate “Made in Europe” requirements for e-fuels** used by ships calling at EU ports, to guarantee that sustainability and industrial competitiveness advance hand in hand.
- **Maintain regulatory stability by keeping the GHG methodology for RFNBO rules untouched**, as investors need certainty to move projects to Final Investment Decisions.

These regulatory measures would help create market signals and drive investment in first-of-a-kind e-fuels projects to support EU maritime sector transition. They would also help avoid stranded assets and fragmented certification systems across Member States.

The EU has already built strong regulatory foundations, and now needs to lead the transition towards a cleaner and more competitive industry by re-investing part of shipping ETS revenues back in the sector to support domestic e-methanol and e-ammonia producers and strengthening FuelEU Maritime during the revision in 2027.

While the recently published STIP is a good step forward, we urge the European Commission to act swiftly in translating these recommendations into binding instruments to ensure that Europe defines the next era of clean maritime fuels.

Yours sincerely,

Signatories

