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Tittel: RE: Høring - forslag til innretning av nullutslipp i verdensarvfjordene fra 2026

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Dear Sirs,

Further to our earlier submission, our technical experts do have the following questions in relation to how the regulation will be practically implemented which you may also wish to consider.

1. **On the reference to RED sustainability criteria**

Noting that the draft regulation has the following reference to RED in square brackets (presumably to be decided upon):

Until 31 December 2035, passenger ships with a gross tonnage of 10,000 or more may use biogas as an energy source in accordance with the requirement in the first paragraph. The biogas must be made from raw material as specified in the regulation and must not contain any of the substances listed in Annex V to the regulation on health and environmentally hazardous chemicals and other products ("the product regulation") chapter 3 annex V. **Biogas must meet the sustainability criteria, the greenhouse gas reductions and the documentation requirements that follow from the revised renewables directive (2018/2001/EU).**

And that RED includes:

[Article 29 - Sustainability and greenhouse gas emissions saving criteria for biofuels, bioliquids and biomass fuels](#)

[Article 30 - Verification of compliance with the sustainability and greenhouse gas emissions saving criteria](#)

As such,

- **Is there an anticipated requirement that NMA will want the sustainability certification of fuels verified before entering a heritage fjord?**

If so,

- **How will the sustainability criteria from RED in the above mentioned articles be verified on an individual ship level?** I understand (albeit quite simplistically) that there are going to be issues with proof of sustainability certificates being passed through supply chains from feedstock to end user as there is only one certificate available, and verification of it can be a challenge.
- **What happens if the cannot be verified as meeting the sustainability criteria?**

2. **On the bunkering timescales for biogas**

Noting the draft regulation states:

**The biogas will be bunkered during the last month before sailing into the world heritage fjords. The biogas must correspond to the amount of energy that will be used in the world heritage fjords. The biogas must be kept bunkered. The ship must have documentation on board that the requirements have been met.**

- Is there an expectation that the RO must verify this paperwork ahead of a transit into a heritage fjord?

### 3. On the on shore power requirements

In the world heritage fjords, passenger ships must use shore power where this is available.

- Will any of the onshore power requirements in AFIR or FuelEU for infrastructure availability, compatibility, information exchange requests for connections, timings for installation, requirements for connections and exceptions/exemptions to connection points (e.g. incompatibility of connection points) be referenced here.

Yours faithfully,

#### Michael North on behalf of Lloyd's Register

Sales Manager and Senior Representative for Norway

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**From:** North, Michael

**Sent:** Monday, October 2, 2023 8:56 PM

**To:** 'Postmottak' <Post@sdir.no>

**Cc:** Norway <Norway@lr.org>; Skog, Frank <frank.skog@lr.org>; Sayer, William <William.Sayer@lr.org>

**Subject:** RE: Høring - forslag til innretning av nullutslipp i verdensarvfjordene fra 2026

Dear Norwegian Maritime Authority,

Please find attached Lloyd's Register's comments in response to the proposed regulation.

Should you require further clarification or input please do not hesitate to contact us.

Yours sincerely,

### Michael North on behalf of Lloyd's Register

Sales Manager and Senior Representative for Norway

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**Cc:** [postmottak@kld.dep.no](mailto:postmottak@kld.dep.no); Linda Bruås <[LBU@sdir.no](mailto:LBU@sdir.no)>

**Subject:** Høring - forslag til innretning av nullutslipp i verdensarvfjordene fra 2026

Etter oppdrag fra Klima- og miljødepartementet, stadfestet i brev 29. juni 2023, sender Sjøfartsdirektoratet med dette forslag om endring av forskrift om miljømessig sikkerhet for skip og flyttbare innretninger på høring. Forslaget innebærer en egen regulering om utslipp av klimagassene karbondioksid og metan i verdensarvfjordene og bruk av best tilgjengelig teknologi for å redusere utslipp av lystgass.

Endringene trer i kraft 1. januar 2026. For å gi lokale myndigheter og andre berørte aktører en realistisk mulighet for å omstille seg og tilpasse seg de nye kravene innføres det en overgangsordning hvor bruk av biogass blir tillatt brukt under gitte betingelser. Dette vil bidra til å sikre verdensarvfjordene som anløpshavn også etter 2026. De foreslåtte tiltakene vil føre til reduserte utslipp i verdensarvfjordene og vil bidra til å verne om verdensarvfjordene.

Høringsuttalelser sendes Sjøfartsdirektoratet innen **3. oktober 2023** til [post@sdir.no](mailto:post@sdir.no). Høringen vil også bli lagt ut på Sjøfartsdirektoratets hjemmeside [www.sdir.no](http://www.sdir.no).

Spørsmål om høringen kan rettes til Henrikke Roald, underdirektør Regelverk og avtaler via [hero@sdir.no](mailto:hero@sdir.no).

#### **In English:**

Following an assignment from the Ministry of Climate and the Environment, confirmed in a letter on 29 June 2023, the Norwegian Maritime Authority (NMA) hereby circulates for review the proposed amendments to the Regulations on environmental safety for ships and mobile offshore units. The proposal includes a separate regulation of emissions of the greenhouse gases carbon dioxide and

methane in the world heritage fjords and the use of the best available technology to reduce N2O emissions.

The amended Regulations will enter into force on 1 January 2026. To give regional authorities and other affected parties a realistic opportunity to adjust and adapt to the new requirements a transitional arrangement is introduced permitting the use of biogas under certain circumstances. This will help ensure that the world heritage fjords remain ports of call beyond 2026. The proposed measures will reduce the emissions in the world heritage fjords and contribute to preserving the world heritage fjords.

Please submit your comments to the proposal to the Norwegian Maritime Authority by e-mail to [post@sdir.no](mailto:post@sdir.no) by **3 October 2023**. This consultation document will also be published on our website [www.sdir.no](http://www.sdir.no).

Hilsen  
Sjøfartsdirektoratet