

## ANAVE – Circular de Régimen Interior

Madrid, 11 de septiembre de 2015  
Ref: UE 2/2015/ES

**Asunto: Impacto económico de la entrada en vigor de los límites al contenido de azufre de los combustibles marinos.**

**Cuestionario on-line. Fecha límite: 30 de septiembre**

Muy Srs. nuestros:

El Foro Europeo sobre el Transporte Marítimo Sostenible (*European Sustainable Shipping Forum*, ESSF), es un órgano consultivo de la Comisión Europea sobre la normativa de reducción de las emisiones contaminantes procedentes del transporte marítimo.

Dentro de sus muchas actuaciones, se encargó a la organización de las asociaciones europeas de navieras (ECSA), el establecimiento de un sistema de seguimiento y evaluación del impacto económico de la aplicación de las nuevas normas sobre el sector y que también evaluase, en su caso, el transvase modal de cargas a la carretera. Con este fin, ECSA ha desarrollado y puesto en marcha una encuesta on-line, que pretende detectar las dificultades que están encontrando las navieras.

Consideramos que la participación de las empresas resulta importante para trasladar a la Comisión el impacto que los nuevos límites al contenido de azufre están teniendo en las empresas navieras europeas y, en su caso, el trasvase modal a la carretera que se está produciendo o al que podría dar lugar, por lo que animamos a las empresas a contestar.

La encuesta debe contestarse on-line a través del siguiente enlace: <http://svy.mk/1JwDMfi> y estará disponible hasta el próximo miércoles 30 de septiembre.

Muy cordialmente,

Manuel Carlier  
Director General

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## **ECSA/ESSF Monitoring Economic Impact Survey Third Round September 2015**

### **1. Purpose of the survey**

**This survey aims to gather real-time information about the economic impact of the low sulphur limits for marine fuels that have become effective from 1 January 2015 in the European SO<sub>x</sub> Emission Control Area (SECA), which comprises the Baltic Sea, the North Sea and the English Channel.**

**The survey is compiled by the European Community Shipowners' Associations ([www.ecsa.eu](http://www.ecsa.eu)) under the auspices of the European Sustainable Shipping Forum (ESSF), a multi-stakeholder platform set up by the European Commission to facilitate the implementation of the low sulphur rules. Its results will be shared through the ESSF.**

**The survey is addressed to ship operators who are wholly or partly active in the European SECA. The survey is part of an exercise agreed within ESSF to monitor the economic impact of low sulphur requirements. This monitoring phase which started in autumn 2014 and is continuing throughout 2015 is focusing mainly on qualitative indicators of economic impact, as perceived by ship operators. Based on the initial results of the survey a comprehensive analysis might be developed in a later stage by the European Commission, providing a fuller explanation of all relevant factors, including the incremental costs of different practices to meet the EU Sulphur Directive requirement as well as other factors that may have affected the competitiveness of maritime shipping, and possible counteractions to increase competitiveness and/or reveal best practice. This exercise covers both liner traffic as well as tramp shipping.**

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### **2. Confidentiality and commitment**

**This is the third round of a Snapshot Survey and is launched in September 2015. The first round was launched in November 2014 and the second one in February 2015.**

**The survey questionnaire is circulated to appropriate/identified ship operators. Responses will be submitted to ECSA and treated confidentially. The results will be solely presented in an aggregated form on a range-to-range basis and not in a form related to individual shipping companies or ships.**

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**3. Consultation period and practical information**

**Consultation period of the third round of the survey: 01/09/2015 - 30/09/2015.**

**The respondent is kindly invited to provide the information requested for the period 16/02/2015 - 31/08/2015.**

**Questions marked with an asterisk (\*) are mandatory and the respondent will not be able to move to the next survey page if answers are not provided to the required fields.**

**While completing the survey, respondents can go back to previous pages and update existing responses until the survey is finished or until they have exited the survey. However, after submitting the survey, the respondent will not be able to update existing responses.**

**For further clarifications regarding the questionnaire, please contact the ECSA secretariat (maria.deligianni@ecsa.eu)**

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**4. Identification of operator**

**\* 1. Please provide:**

**Name:**

**Function:**

**Company:**

**City/Town:**

**Country:**

**Email Address:**

\* 2. Your company is active in the following trades in the European SECAs:

Container

RoRo

RoPax

Conventional general cargo

Liquid bulk

Dry bulk

Cruise

Other

If other, please specify:

\* 3. How many ships does your company operate?

0-5

5-10

10-20

20-30

30-40

40-50

>50

\* 4. What proportion of your company's ships operated in the European SECAs in the period 16/02/2015 until 31/08/2015?

None

0-25%

25-50%

50-75%

75-100%

100%

\* 5. Your company is active in the European SECAs:

- in liner shipping
- in tramp shipping
- both liner and tramp shipping
- Other

If other, please specify:

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### 5. Economic impact

**In section 5, you will be invited to assess whether the introduction of the low sulphur limits for marine fuels had an impact on your Company's freight rates, on the behavior of your customers and on the level of service (frequency, number of vessels deployed).**

**Please note that the reference period is 16/02/2015 - 31/08/2015.**

## ECSA/ESSF Monitoring Economic Impact Survey Third Round September 2015

### 5.1 Increase of Company's freight rates & effect on the behavior of the customers

\* 6. Has the introduction of the low sulphur limits for marine fuels increased your company's freight rates?

- Yes
- No

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### 5.1.1 Increase of Company's freight rates & effect on the behavior of the customers

\* 7. Please quantify the increase of your company's freight rates due to the low Sulphur requirement of the EU Sulphur Directive:

%

Increase in company's freight rates:

Please explain how the price increase of your company's freight rates came about:

\* 8. Please specify how much volume (%) has been lost due to the increase in freight rates:

(%)

Volume

Please comment:

\* 9. Please describe the effect on the behaviour of your customers:

\* 10. Did the effect in the behaviour of your customers involve a modal shift?

	Yes	No	I am not sure
Land	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rail	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please comment:

\* 11. Did the price of Marine Gas Oil / Marine Diesel Oil (MGO/MDO) influence your company's freight rates or the behavior of your customers?

- Yes
- No
- I am not sure

Please comment:

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**5.2 Impact on the level of service (frequency, number of vessels deployed)**

\* 12. Has the introduction of the low sulphur limit had an impact on your level of service (frequency, number of vessels deployed)?

- Yes
- No

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**5.2.2 Impact on the level of service (frequency, number of vessels deployed)**

\* 13. Have you noticed a higher impact on the level of service of a route or voyage because of the introduction of the EU Sulphur Directive low sulphur limit (note: the route part is for liner and the voyage part for tramp shipping):

	Start port	Final destination port
Route	<input type="text"/>	<input type="text"/>
Voyage	<input type="text"/>	<input type="text"/>

Please describe briefly the impact you noticed on the level of service:

14. Please specify any other economic impact you witness.

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### 6. Enforcement Measures

**In this section, ship operators are invited to share their experiences on enforcement measures of the EU Sulphur Directive during the period from 16/02/2015 to 31/08/2015. Ship operators are asked to indicate the number of ships inspected per country of inspection and describe whether they have experienced any accidental/operational non-compliant cases. Ship operators are also asked to report any fine or any sulphur inspection cost imposed.**

\* 15. Please indicate the number of ships that have been inspected so far in the European SECAs:

	No of ships inspected
#	<input type="text"/>

\* 16. Please indicate the number of sulphur inspections of your company's ships per country of inspection:



No of ships inspected

Belgium	<input type="text"/>
Bulgaria	<input type="text"/>
Denmark	<input type="text"/>
Germany	<input type="text"/>
Estonia	<input type="text"/>
Ireland	<input type="text"/>
Greece	<input type="text"/>
Spain	<input type="text"/>
France	<input type="text"/>
Croatia	<input type="text"/>
Italy	<input type="text"/>
Cyprus	<input type="text"/>
Latvia	<input type="text"/>
Lithuania	<input type="text"/>
Malta	<input type="text"/>
Netherlands	<input type="text"/>
Poland	<input type="text"/>
Portugal	<input type="text"/>
Romania	<input type="text"/>
Slovenia	<input type="text"/>
Finland	<input type="text"/>
Sweden	<input type="text"/>
United Kingdom	<input type="text"/>

Please comment if you wish:

\* 17. Have there been any non-compliant cases?

Yes

No

Please describe briefly these non-compliant cases:

18. What compliance method were the majority of the non-compliant ships using?

Use of compliant fuel 0,1% compliant fuel

Scrubbing technology

LNG as alternative fuel

Methanol

N/A

\* 19. Have you experienced so far any accidental/operational non-compliant cases (including non-availability of compliant fuel)?

Yes

No

If yes, please explain briefly the problems you have encountered:

20. Please indicate the size of the fine(s)/sanction(s) imposed in non-compliant cases:

21. Have your company's ships been subject to any sulphur inspection costs (i.e. sampling costs, etc)?:

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**7. Other feedback**

22. Please use this text below to provide any general comment or additional information you want to share with us.

\* 23. Please note that your individual response in the survey can be provided on PDF format exclusively by ECSA. Please indicate whether you wish ECSA to export your individual response and send it back to the contact person identified within the questionnaire:

Yes

No