

8th July 2025

JSA Comments on EU ETS Public Consultation

The Japanese Shipowners' Association (JSA), representing 135 Japanese shipping companies, some of which are serving European ports, is pleased to submit our general comments regarding the EU Emissions Trading System (EU ETS).

First of all, we greatly appreciate the European Commission's endeavours and initiatives towards global decarbonisation in international fora such as the International Maritime Organization (IMO). As you know, the IMO in April 2025 approved the "IMO Net-Zero Framework" which is primarily composed of a new fuel standard for ships and a global pricing mechanism for GHG emissions with a strong majority support including EU Member States, Japan, China and Brazil. The new global measures will be incorporated into the amended MARPOL Annex VI, which is now expected to be adopted at the next IMO extraordinary session held in October this year, and will then enter into force in 2027.

While we respect the advanced measures such as the EU ETS and FuelEU Maritime, once the global measures come into effect, double measures on the same emissions will result in too hefty a burden on the international maritime industry in terms of administrative and economic load. Although the emission trading scheme itself could be one of the effective measures to reduce GHG emissions, as a way to regulate the emissions from international shipping, the IMO has elected the system to regulate GHG intensity, which is similar to, but stricter than the FuelEU Maritime, after thorough discussion.

Bearing in mind the above situation and developments to date, the JSA respectfully urges the European Commission that the EU ETS for international shipping, along with FuelEU Maritime, should be replaced by the IMO global measures once they come into effect, in order to achieve global citizens' common goal of reducing global warming in an effective and efficient manner.

The JSA, in this respect, fully supports the submission by the Ministry of Land, Infrastructure, Transport and Tourism (Japanese Authority) and the International Chamber of Shipping, which also call for a replacement of EU regime with IMO global measures.

We sincerely appreciate the European Commission's understanding.
