

2025 年 7 月 8 日
一般社団法人 日本船主協会

EU-ETS（EU 排出権取引制度）の外航海運への適用に関する
日本船主協会コメントの提出（欧州委員会宛）

今般、EU-ETS（EU 排出権取引制度）の海運、航空分野等に関する適用に係る欧州委員会のパブリックコンサルテーションの機会を捉え、当協会は本日、以下趣旨のコメントを提出しましたのでお知らせします。

<日本船主協会コメント（要旨）>

- ・ EU の国際裡における脱炭素化に係る取組みに敬意
- ・ EU 諸国も賛同した IMO のネットゼロフレームワークは、2027 年発効予定
- ・ EU ETS や FuelEU Maritime といった欧州の先進的取組は尊重するものの、IMO の国際規制発効後は国際海運業界に過剰に重い二重負担を課すこととなる。
- ・ ETS は有用な規制手段ではあるが、国際海運における GHG 排出規制としては、IMO は徹底した審議の結果、FuelEU と類似しているもののそれよりも厳しい GHG 強度規制を採用した。
- ・ よって、IMO 規制が発効されれば、国際海運に係る EU ETS は FuelEU Maritime とともにリプレイスされるべき。これが、地球温暖化対策として効率的かつ効果的な方式と考える。
- ・ 別途日本の国土交通省および ICS（国際海運会議所）から提出されたコメントを全面的に支持する。

提出された文面（英文）につきましては、以下ご参照下さい。国土交通省や ICS コメント等とともに欧州委 website に掲載されております。

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14549-EU-emissions-trading-system-for-maritime-aviation-and-stationary-installations-and-market-stability-reserve-review_en

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.

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