2026 年 11 月
一般社団法人　日本船主協会

欧州排出量取引制度（EU ETS）等改正案への当協会コメントについて

当協会は 11 月 2 日、欧州委員会（EC）が実施していた欧州排出量取引制度（EU ETS）等の改正案に係る意見募集に対するコメントを欧州委員会に提出しました。主な改正案と当協会のコメントの概要は以下のとおりです。

１．IMO を中心とする国際的・統一的な制度の確保

改正案では、国際海事機関（IMO）による世界共通の温室効果ガス（GHG）削減のための経済的措置が採択された場合の EU ETS の見直しにおいて、二重払いの回避に向け、IMO 措置に基づく支払いを踏まえて EU 排出枠の償却義務を軽減する仕組みを検討することが提案されています。

当協会コメントでは、国際海運の GHG 削減は IMO を中心に世界共通の制度の下で進めるべきとの立場から、IMO 中期対策の適用開始時に、国際海運に適用される EU ETS および FuelEU Maritime から IMO 制度への一本化を実現するよう求めています。

２．国際海運への「ETS as a Service」適用の再考

改正案では、第三国の温室効果ガス排出への価格付けを行政面・技術面から支援する「ETS as a Service」を設けることが提案されています。海運では、EU と支援を受ける第三国を結ぶ航海について、現行 EU ETS の対象外である残り 50%の排出にも価格付けを行い、これに対応する排出枠の競売収入を、気候変動対策のため当該第三国に還元する仕組みが提案されています。

当協会コメントでは、EU 独自制度のさらなる拡大・強化は、規制の重複や地域ごとの制度の分断を招き、船社の負担を増やすとともに、IMO での合意形成に負の影響を及ぼす懸念があるため、国際海運への適用について再考を求めています。

３．海運の代替燃料・推進技術への支援制度（SMAP）の拡充

改正案では、バイオガスや先進バイオ燃料等の持続可能な船舶燃料の利用、電気推進や風力補助推進等のゼロエミッション推進技術の導入・運用を支援する SMAP の新設が提案されています。従来の燃料・推進技術との費用差を縮小することを目的としていますが、支援対象となる燃料の種類や生産地等には一定の制限が設けられています。

当協会コメントでは、海運から得られる EU ETS 収入を可能な限り海運の脱炭素化に還元すべく、SMAP に充てる排出枠の拡充とともに、支援対象の拡大と燃料生産地制限の撤廃を求めています。

４．グリーン海運回廊の拡充

改正案では、EU 港と所定の域外港を結ぶグリーン海運回廊の対象航海で使用する持続可能な船舶燃料について、SMAP の生産地要件を免除する仕組みが提案されています。

当協会コメントでは、持続可能な船舶燃料の供給・利用や関連投資を促進するグリーン海運回廊の発展を支持する一方、SMAP への公平なアクセスを、支援対象の範囲内で、特定のグリーン海運回廊の指定による例外措置に依存しない形で確保することなどを求めています。

５． EU MRV と IMO DCS の完全調和

改正案では、EU の GHG 排出量の監視・報告・検証制度（EU MRV）と FuelEU Maritime に共通する基礎データの監視・報告・検証手続を共通化するとともに、IMO の燃料消費実績報告制度（DCS）との整合性を高めることが提案されています。

当協会コメントでは、これらの提案を歓迎するとともに、船舶および船舶管理会社の回避可能な作業の重複を解消するため、IMO DCS に加え、今後の IMO 中期対策に関連して策定される要件も含め、IMO の監視・報告・検証要件との完全調和を目標とすることを求めています。

なお、アジア船主協会（ASA）も 11 月 3 日、国際海運には世界統一ルールが必要との立場からコメントを提出し、IMO 中期対策の適用開始時に、国際海運に適用される EU ETS および FuelEU Maritime から IMO の世界共通制度へ移行することや、国際海運への ETS as a Service の適用を再考することを求めています。

当協会および ASA のコメント（原文）は添付のとおりです。

以上

Ref. Ares(2026)10253341 - 02/11/2026

2 November 2026

Comments of the Japanese Shipowners' Association on the proposed amendments to the EU ETS

The Japanese Shipowners' Association (JSA) represents 133 Japanese shipping companies, including companies operating ships that call at European ports. The JSA welcomes the opportunity to submit comments on the maritime aspects of the European Commission's proposal to amend the EU Emissions Trading System (EU ETS) (COM(2026) 616 final) and the related proposal to amend the monitoring, reporting and verification framework (COM(2026) 620 final).

The JSA appreciates the European Commission's efforts to decarbonise shipping and supports continued cooperation towards establishing an effective global framework under the International Maritime Organization (IMO).

1 A single global framework for international shipping

The JSA reiterates its position, as expressed in July 2025, that the EU ETS and FuelEU Maritime, as applied to international shipping, should be replaced by the IMO's global GHG reduction measures when those IMO measures begin to apply. A globally harmonised framework is essential to reduce emissions effectively, maintain a level playing field and ensure predictability for investment.

The JSA recognises the European Commission's intention to address double payments following the adoption of a global IMO framework. However, reducing the obligation to surrender EU allowances to reflect payments made under those measures would not, on its own, eliminate regulatory duplication. Shipowners and ship management companies would continue to face parallel compliance, monitoring, reporting and verification requirements, with the associated administrative burdens and costs.

The present review should therefore explicitly address the elimination of duplicative regulatory obligations, in addition to addressing financial burdens. The JSA calls on the European Commission to prepare the necessary legislative amendments and a clear transition timetable to ensure that this replacement takes place when the IMO measures begin to apply.

If a period of unavoidable regulatory overlap arises before this replacement takes effect, effective measures should be taken to prevent double payments from the outset of that period.

The specific comments below do not alter this position, but seek to reduce burdens and promote the decarbonisation of shipping for as long as the EU measures remain in place.

2 Reconsideration of the application of ETS as a Service to international shipping

The JSA expresses strong concerns about the proposed application of ETS as a

Service to international shipping. While discussions are under way at the IMO to establish a global GHG reduction framework, further expanding and strengthening the EU's own carbon pricing system could lead to regulatory duplication and fragmentation of systems across regions, increase burdens on shipping companies and undermine efforts to build consensus at the IMO.

The JSA therefore strongly urges the European Commission to reconsider the application of ETS as a Service to international shipping and to prioritise the establishment and smooth implementation of an effective global framework under the IMO. Cooperation with third countries should likewise support these global efforts and promote the supply of sustainable maritime fuels and the development of the necessary infrastructure.

3 Enhanced support for sustainable maritime fuels and decarbonisation technologies

The JSA supports the objective of SMAP (Sustainable Maritime Alternative Propulsion) to narrow the cost gap associated with the decarbonisation of shipping.

In view of the costs borne by the maritime sector under the EU ETS and the scale of investment required for decarbonisation, the JSA calls for EU ETS revenues generated from the maritime sector to be returned as far as possible to support the decarbonisation of that sector, and for a substantial increase in the allowances allocated to SMAP.

The proposal includes biogas and advanced biofuels, but support should also be extended to other sustainable biofuels that meet stringent sustainability and traceability criteria and deliver verified GHG emission reductions across their life cycle.

Shipping companies are not necessarily in a position to ascertain or control where fuels are produced, even when those fuels are bunkered within the EU, and the production-location requirement may create a barrier to accessing the scheme. In view of these practical burdens and the need for fair support based on environmental performance, the JSA calls for the removal of requirements restricting where eligible fuels may be produced.

Support for fuels should be based on objective environmental criteria, including sustainability, traceability and GHG emission reductions over the full life cycle, irrespective of where the fuels are produced or bunkered. For decarbonisation technologies other than fuels, such as electric and wind propulsion, eligibility for support and the nature of that support should also be determined on the basis of objective criteria reflecting the characteristics of each technology and its verified GHG emission reductions. In addition, the design of these support arrangements should be simple, technology-neutral and geography-neutral.

Non-EU shipping companies should also have equal access to support in practice, irrespective of their place of establishment or the flags of their ships.

4 Enhancement of green shipping corridors

The JSA supports the development of green shipping corridors between EU ports and ports in third countries as a practical means of accelerating the use of sustainable maritime fuels and related investment.

Non-EU ports should be designated in accordance with transparent and objective criteria, and participation and access to support should be open to the operators concerned on equal terms, irrespective of their place of establishment or the flags of their ships. Corridors should extend decarbonisation solutions to broader international trade and complement the IMO's global framework.

In addition, fair access to SMAP should be ensured within its scope of support, including eligible voyages, without relying on exemptions arising from the designation of specific green shipping corridors.

5 Full harmonisation with the IMO's Data Collection System for fuel oil consumption

The JSA welcomes the proposals to establish common monitoring, reporting and verification procedures for the underlying data shared by EU MRV and FuelEU Maritime, and to improve alignment with the IMO's Data Collection System for fuel oil consumption (DCS).

Furthermore, to eliminate avoidable duplication of work for ships and ship management companies, the JSA requests that full harmonisation with IMO monitoring, reporting and verification requirements be adopted as an objective, including requirements to be developed in connection with the IMO's future mid-term measures. Specifically, for common data items, the JSA calls for greater data reuse, alignment of monitoring and calculation methods and reporting formats, mutual use of verification results, and common submission procedures.

The JSA sincerely appreciates the European Commission's understanding of the above.

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3 November 2026

COMMENTS ON THE PROPOSED REVISION OF THE EU ETS
ASIAN SHIPOWNERS' ASSOCIATION

The Asian Shipowners' Association (ASA) respectfully submits the following comments on the European Commission's proposal to revise the EU Emissions Trading System (EU ETS), COM(2026) 616 final.

ASA is a voluntary regional body bringing together the shipowners' associations of China, the Cook Islands, Hong Kong, Japan and Korea, together with the Federation of ASEAN Shipowners' Associations (FASA). It works to protect and promote Asian shipowners' shared interests and to coordinate their positions on international maritime policy. The fleets controlled and operated by shipowners and managers represented through ASA are estimated to account for roughly half of the world's cargo-carrying fleet.

ASA supports efforts to decarbonise international shipping through effective global action led by the International Maritime Organization (IMO), in line with the 2023 IMO GHG Strategy and its ambition to reach net-zero GHG emissions by or around 2050. ASA also supports the early adoption by IMO of effective global mid-term GHG reduction measures to achieve this ambition.

The proposal covers a wide range of issues. This submission focuses on two matters of fundamental importance to international shipping. The absence of comments on other elements of the proposal should not be interpreted as support for, or acceptance of, those elements.

1 A single global GHG regulatory framework for international shipping

ASA calls on the EU to complete the transition from the EU ETS and FuelEU Maritime requirements applicable to international shipping to a single, effective global GHG regulatory framework under IMO when the global IMO mid-term GHG reduction measures become applicable. A common framework would provide shipowners with more consistent regulatory conditions for their operations and long-term investment across international trading routes.

ASA recognises the importance of addressing double payment. However, even if financial adjustments were introduced to prevent double payment, they alone might not fully address the challenges arising from parallel regional and global regimes. Shipowners could remain subject to differing compliance requirements and methods for assessing fuels and emissions. These differences could complicate fuel selection, fleet deployment and long-term investment, as well as give rise to additional compliance costs. A single global framework would therefore offer benefits beyond avoiding double payment.

2 Reconsideration of the application of ETS as a Service to international shipping

ASA calls on the European Commission to reconsider the proposed application of ETS as a Service to international shipping. ASA recognises the proposal's aim of

supporting carbon pricing in third countries. However, further expanding and strengthening the EU's carbon-pricing framework for international shipping could lead to overlapping regulatory requirements and further fragmentation across regions if it operates alongside a separate global IMO regime. This could increase the complexity and cost of compliance for shipping companies operating internationally.

ASA believes that priority should be given to establishing and implementing an effective global framework under IMO. In this connection, ASA calls on the European Commission not to further expand or strengthen the EU carbon-pricing framework for international shipping — including through 'ETS as a Service'. ASA would welcome cooperation between the EU and third countries that contributes to this common effort, including support for sustainable marine fuel supplies and the infrastructure needed for their use.

ASA would be grateful for the Commission's understanding and consideration of these concerns.
