

*eNG Coalition Contribution to the EU Industrial Maritime Strategy Consultation
July 2025.*

The eNG Coalition welcomes the European Commission's initiative to develop a robust EU Industrial Maritime Strategy that strengthens the resilience, sustainability, and competitiveness of Europe's waterborne industrial base. As decarbonisation and strategic autonomy take centre stage, the maritime sector must embrace a technology-neutral approach that fully integrates renewable and low-carbon fuels such as e-methane (e-NG) and e-LNG into its long-term policy vision.

This contribution aims to highlight the untapped potential of these fuels for industrial decarbonisation, infrastructure resilience, and maritime competitiveness while offering actionable proposals for recognition and integration into the EU maritime framework.

1. Strategic recognition of e-NG and e-LNG

The EU maritime strategy must explicitly recognize synthetic methane (e-NG) and e-LNG as key fuels enabling the green transition of shipping and port industries.

These fuels:

- Are drop-in compatible with current LNG systems and ship engines, reducing the need for costly infrastructure retrofitting;
- Enable the transport and storage of renewable hydrogen in a stable form, solving bottlenecks in hydrogen logistics;
- Are already eligible under EU regulations such as REDIII and the FuelEU Maritime regulation but lack strategic prominence in policy.

Recommendation:

- Include e-NG and e-LNG in all EU maritime policy roadmaps, FuelEU Maritime implementation discussions, and TEN-T infrastructure planning.
- Mandate their consideration in EU-funded R&D and innovation projects (e.g., Horizon Europe, CEF).

2. Strengthen maritime fuel sovereignty

The EU currently faces growing competition in maritime manufacturing and a lack of secure access to future-proof fuels. Supporting domestic and imported production of e-NG strengthens Europe's autonomy, stabilizes pricing, and diversifies maritime fuel supplies.

Recommendation:

- Develop dedicated financial instruments for synthetic methane infrastructure (e.g., inclusion in the Hydrogen Bank or in the future Industrial Decarbonisation Facility under the Innovation Fund).
- Ensure equal treatment for e-NG alongside renewable hydrogen in incentives, CfDs, and import support schemes.

3. Regulatory clarity & inclusion of the maritime sector in the Union Database (UDB)

The success of e-NG and e-LNG in the maritime sector depends on clear, stable rules and efficient certification systems. Existing LNG terminals and bunkering systems can be leveraged to immediately deploy e-NG and e-LNG at scale. The Union Database (UDB), as established under RED III, plays a critical role in ensuring transparency and preventing double counting of renewable fuels. Currently, however, the maritime sector is not fully integrated into this system. Furthermore, 3rd countries that meet EU sustainability and mass balance criteria should be integrated into the system to enable proper recognition of renewable imports, especially by shipowners and fuel producers operating across international supply chains.

Recommendation:

- Promote bilateral partnerships with 3rd countries for e-NG supply and integrate these imports into the EU certification and tracking systems (UDB).
- UDB be extended to cover the maritime sector without delay including the certification, traceability, and sustainability tracking of fuels such as e-LNG and biomethane used in shipping.
- Recognize mass balance and liquefaction by equivalence as valid certification methods under REDIII and FuelEU Maritime.
- Include e-NG in the EU Maritime Fuel Infrastructure planning, in the same category as renewable hydrogen and methanol.

4. Signal industrial demand to foster early market uptake

As the IMO is under development of the IMO Net Zero Framework, it is important to maintain consistency between the international and regional level. Incentivizing the use of e-NG and e-LNG in maritime applications is key to scale production and build confidence for shipowners and investors.

Recommendation:

- Set renewable gaseous fuel targets for maritime sectors, including e-NG, via blending mandates or sub-targets under FuelEU Maritime.
- Create a Net-Zero Shipping Incentive (e.g. like the ZNZ reward) that recognizes GHG lifecycle savings of fuels like e-NG and provides financial and regulatory benefits to their users.
- Encourage private-public maritime fuel alliances (as piloted by the CEM, Green Corridors, etc.) to accelerate fuel deployment and vessel retrofitting.

The EU Industrial Maritime Strategy is a timely opportunity to align maritime decarbonisation with strategic autonomy, economic resilience, and industrial leadership. Fully integrating e-NG and e-LNG into this strategy is essential to deliver on the EU's climate goals while leveraging existing infrastructure and securing clean, scalable fuels for the decades ahead.

eNG Coalition remains committed to supporting the Commission in this process and stands ready to contribute technically and strategically to the finalisation of the EU Industrial Maritime Strategy.

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