



FONASBA MEMBERSHIP SURVEY ECASBA
COUNTRIES – Belgium – 17.07.2024

ECASBA Survey Results: BELGIUM 2024 - REGULATION (EU) 2022-91 21.01.2022 on Ship Waste

Introduction to Participants:

The EU COMMISSION IMPLEMENTING REGULATION (EU) 2022/91 of 21 January 2022 defines the criteria for determining that a ship produces reduced quantities of waste and manages its waste in a sustainable and environmentally sound manner in accordance with Directive (EU) 2019/883 of the European Parliament and of the Council.

Full text can be found via Publications Office (europa.eu) <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022R0091>

We urgently received feedback regarding the implementation and impact of this regulation in respective countries.

Survey Questions and Answers:

1. Is this regulation already implemented in your country? Yes or no

YOUR COUNTRY	NAME OF YOUR ASSOCIATION/COMPANY	1. Is this regulation already implemented in your country? Yes or no
Croatia	ASBA Croatia	Yes
Denmark	Danish Shipbrokers and Port Operators	Yes
Finland	Shipbrokers Finland	Yes
France	AMCF	Yes, for ports having facilities to collect, treat, and evacuate ship waste.
Japan	Japan Association of Foreign-Trade Ship Agencies	Yes
Lithuania	Limarko Maritime Agency UAB	Yes
Netherlands	VNC	Yes, see further details for Port of Rotterdam (page 18): https://www.portofrotterdam.com/sites/default/files/2023-12/algemene-voorwaarden-haventarieven-2024.pdf
Slovenia	The Slovenian Ship and Freight Agents Association	Yes
Sweden	The Swedish Shipbrokers Association	Yes

2. With regard to the list of mandatory criteria set out in section 1 of the annex, and to be considered by the port authorities when calculating the reduction of the fees. What means of verification can ships use to demonstrate that they comply with the criteria accepted by your port authorities?

YOUR COUNTRY	NAME OF YOUR ASSOCIATION/COMPANY	2. With regard to the list of mandatory criteria set out in section 1 of the annex and to be considered by the port authorities when calculating the reduction of the fees. What means of verification by which ships can demonstrate that they comply
Croatia	ASBA Croatia	The tariff includes direct fees and indirect fees. The direct fee is calculated according to the ship size (GT). Indirect fee is calculated according to the type of collected ship's waste as described in MARPOL 73/78, Annex V. No further reduction of fees is presently applicable in Croatia.
Denmark	Danish Shipbrokers and Port Operators	The Danish Maritime Authority is responsible for carrying out Port State Controls, which would include relevant logging of waste by the ships.
Finland	Shipbrokers Finland	Ships or the waste receiver deliver the receipt to the port directly or through an agent.
France	AMCF	Port authority agents proceed to random controls, check disposal certificates, and ship equipment.
Japan	Japan Association of Foreign-Trade Ship Agencies	Ship inspections are conducted to ensure that waste oil and other discharges are prevented equipment installed or not.
Lithuania	Limarko Maritime Agency UAB	For vessels with an on-board waste treatment system installed, operated and recognised by international certificates (with documentary evidence, as well as other modern waste management systems that reduce the amount of waste, and with the reuse and sorting of waste, the sanitary due shall be reduced by 20%.
Netherlands	VNC	See the link that has been shared.
Slovenia	The Slovenian Ship and Freight Agents Association	Green Award certificate
Sweden	The Swedish Shipbrokers Association	The Swedish Transport Agency checks that the ports reduce fees according to the mandatory criteria. How the ports check that the ships meet these criteria is up to each port.

3. With regard to the list of optional criteria set out in section 2 of the annex. Are any of these taken into account by your port authorities? Yes or no.

YOUR COUNTRY	NAME OF YOUR ASSOCIATION/COMPANY	3. With regard to the list of optional criteria set out in section 2 of the annex. Are any of these taken into account by your port authorities? Yes or no.
Croatia	ASBA Croatia	The tariff includes a direct fee and an indirect fee. The direct fee is calculated according to the ship size (GT). Indirect fee is calculated according to the type of collected ship's waste as described in MARPOL 73/78, Annex V. No further reduction of fees is presently applicable in Croatia.
Denmark	Danish Shipbrokers and Port Operators	See reply 2.
Finland	Shipbrokers Finland	There are about 30 commercial ports in Finland, and they are all companies, which have their own way of pricing, here is the price list of the biggest one Port of Helsinki https://www.portofhelsinki.fi/wp-content/uploads/2024/02/Price_List_2024.pdf
France	AMCF	Yes
Japan	Japan Association of Foreign-Trade Ship Agencies	No
Lithuania	Limarko Maritime Agency UAB	N/a
Netherlands	VNC	See the link that has been shared.
Slovenia	The Slovenian Ship and Freight Agents Association	Yes
Sweden	The Swedish Shipbrokers Association	As regards the non-voluntary criteria, it is also up to the port to check the fulfilment of the criteria.



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4. If yes, which one(s) are taken into account, and what are the means of verification that is accepted by the port authorities in this respect?

YOUR COUNTRY	NAME OF YOUR ASSOCIATION/COMPANY	4. If yes, which one(s) are taken into account, and what are the means of verification that is accepted by the port authorities in this respect?
Croatia	ASBA Croatia	N/A
Denmark	Danish Shipbrokers and Port Operators	See reply 2.
Finland	Shipbrokers Finland	See the price list https://www.portofhelsinki.fi/wp-
France	AMCF	Port Authority agents can proceed to visual controls of the ship's equipment, and document checking of existing class certificates.
Japan	Japan Association of Foreign-Trade Ship Agencies	
Lithuania	Limarko Maritime Agency UAB	
Netherlands	VNC	See the link that has been shared.
Slovenia	The Slovenian Ship and Freight Agents Association	Green Award certificate
Sweden	The Swedish Shipbrokers Association	0