FONASBA

ECASBA

THE FEDERATION OF NATIONAL ASSOCIATIONS OF SHIP BROKERS AND AGENTS

13th November 2026

TO:
ECASBA Members
ECASBA AP

CC:
EXECOM

FONASBA-ECASBA POSITION: EU ETS MARITIME – DECARBONISATION WITHOUT DISPLACEMENT

Dear All,

FONASBA, the global federation of ship agents and shipbrokers, and its European sub-committee ECASBA, the European Community Association of Ship Brokers and Agents, support the decarbonisation of maritime transport and the objectives of the EU ETS.

We welcome the debate FEPORT has opened on carbon leakage, and we share the concern for the competitiveness of European ports that FEPORT and ESPO have both raised. We also share the view of ECSA and the wider shipping industry that a level playing field, secured in the end through a global measure at the IMO, is the lasting answer.

These concerns are also receiving attention within the EU institutions. During the Environment Council debate on 12 October 2026, several Member States, including Portugal, Cyprus, Malta, Greece and Italy, raised concerns about maritime competitiveness, the risk of port call diversion to neighbouring non-EU countries and the protection of peripheral maritime economies. Discussions also addressed the potential inclusion of smaller vessels and the preservation of island connectivity derogations.

As the ETS review moves through the European Parliament and the Council, one question deserves more attention: on some trades, is the scheme reducing emissions or simply moving activity elsewhere? Our members see the early signs first-hand. Routing, port calls and transhipment patterns are changing, and the businesses that serve ships, many of them SMEs, are under growing pressure. A systematic assessment is needed to establish the scale of these changes and the extent to which they are attributable to the ETS.

With the Commission's public consultation having closed on 3 November 2026, the ongoing legislative procedure by Parliament and Council provides a timely opportunity to translate these concerns into practical safeguards (for reference: EP ENVI Committee vote expected on 1 December; Council general approach targeted for 11 December 2026; interinstitutional agreement targeted for Q1 2027- all dates tbc). Both institutions should consider the effects on the wider port services chain alongside those on shipping companies and terminals, particularly when assessing measures against traffic diversion and any extension to smaller vessels.

Our members serve ports on every shore of the Mediterranean and the North Sea. We want a framework in which ports compete on service, efficiency and connectivity, not on differences in regulation.

FONASBA-ECASBA therefore calls for:

- Clear evidence of whether changes in port activity reflect real emission reductions or only a shift in where activity takes place.
- A predictable, proportionate and fair framework that avoids creating distortions.
- Effective coordination between EU and future IMO measures to avoid double carbon payments, together with workable safeguards for essential maritime connectivity.

These criteria can help assess every option under discussion, including FEPORT's cargo-based proposal.

Ship agents handle port calls every day and see routing decisions as they are made. FONASBA-ECASBA is ready to contribute that operational insight to the evidence base. We invite the European Parliament and Member States in the Council to draw on this expertise as they develop their positions on the review. We will work with FEPORT, ESPO, ECSA and the EU institutions towards an ETS that delivers both decarbonisation and competitiveness.

Decarbonisation must go hand in hand with connectivity, fair competition and the sustainability of the businesses that keep ports running.

Fulvio Carlini
FONASBA President

Raymond Troch, FONASBA RVP EUROPE