

November 15, 2021

Liane Randolph, Chair

California Air Resources Board
1001 I Street
Sacramento, California 95814

RE: Need for Stronger CARB's Commercial Harbor Craft Rule

Dear Chair Randolph,

We are writing to comment on CARB's proposed Commercial Harbor Craft Rule – we would like to urge CARB to set a 100% zero-emissions deadline for all vessel segments of the Commercial Harbor Craft by 2035.

Based in the Netherlands, Future Proof Shipping (FPS) offers zero-emissions marine transportation services to enable players across the value chain make the transition to zero-emissions. We are connecting and enabling the entire maritime and green energy value chain, starting with logistics service providers and cargo owners that are ready to take the lead.

We are now in the process of developing a zero-emissions inland container vessel that will carry container cargo between Rotterdam (NL) and Belgium. We have recently secured a recommendation from the European authorities permitting the use of hydrogen as a fuel for propulsion and power supply on board the vessel. Once the retrofit of the Maas is completed later this year, the vessel will continue to ship container cargo between Rotterdam and Antwerp and is expected to reduce greenhouse gas emissions by 2000 CO₂e tonnes annually.

We are building our own fleet of zero-emissions inland and short-sea vessels, which we offer for charter. By 2025, our ambition is to have sailing or in development, a fleet of 10 zero emission vessels inland and short-sea vessels.

We are witnessing a fast-evolving global technological shift that requires more integrated approaches enabling alternative fuels, wind and solar energy, renewable hydrogen, fuel-cell technologies, zero emission dockyards, and many more, to overcome the evidence-based expected ecological catastrophe.

Rules and regulations have a key role to play in enabling technology deployment, and de-risking projects to make them bankable, which in turn, is key to scale and ultimately, commercial viability. The draft rule as written does not go far enough in ambition or technology forcing. The rule does not reduce greenhouse gas emissions at the magnitude or pace required, and risks creating a stranded asset scenario for harbor craft owners who may pay to retrofit to Tier 3 and 4 engines only to be forced to make a full zero-emission transition in just a few years afterwards.

For the marine sector, we believe that a strong but achievable standard would be that all harbor craft operating in the state must be zero emission by 2035. What we need now to drive uptake are strong market accelerating policies, including incentives and funding mechanisms.

We would be happy to discuss our zero-emissions solutions further with you.

Yours sincerely,



Prasanna Colluru

Director of Corporate Strategy

Future Proof Shipping B.V.

cc:

CARB Board members

Secretary Jared Blumenfeld, CalEPA