



Maritime Environment, Technology and
International Division, Maritime Directorate
Department for Transport
Great Minster House
33 Horseferry Road
London, SW1P 4DR

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To whom it may concern

Call for evidence on shore power

Thank you for the opportunity to respond to this call for evidence. Our responses to the specific questions are attached in a separate document alongside additional documents and data referred to in our response. Our response does not prejudice any individual responses from our members; there exists a wide range of opinion on this issue and on possible government intervention. This cover letter summarises our broad position on shore power.

The British Ports Association is the national trade body for UK ports and terminals. We represent over 100 port members who own and operate over 450 ports, terminals and port facilities across the UK. Our members handle 86% of port tonnage.

The British Ports Association recognises that ports have an important role to play in supporting shipping's emissions reduction journey. We support an equitable and fair approach to regulation. We also support the 'polluter pays' principle, enshrined in UK law in the Environment Act 2021.

We firmly believe that any intervention from government, whether it be funding or new regulation, should have a clear aim and measure of success. The BPA estimates that emissions from ships at berth accounted for 0.03% of UK CO₂e emissions in 2019. We do not believe it technically possible for shoreside power to abate all emissions at-berth under any scenario, and even a modest programme of shore power in UK ports could run into billions of pounds in network and portside infrastructure.

We strongly oppose an infrastructure mandate

We do not believe a broad shore power infrastructure mandate passes the cost-benefit analysis if it were to cover every berth in the UK. The level of berth utilisation differs widely by port and vessel type and many berths are multi-purpose, making planning shore power needs incredibly difficult. Providing shore power at every berth would not be technically or



financially possible for many with constrained power networks and the decarbonisation benefits to shipping would be marginal.

The business and environmental case for shore power, as well as the costs of implementing it, varies considerably from port to port. Government should recognise this and take a technology neutral approach to driving down emissions from ships at berth.

Shore power is one way of reducing emissions at berth and should be viewed as a means and not an end in itself. Any kind of infrastructure mandate is unworkable and at odds with decades of UK government ports policy that supports a market-led, commercially operated industry. It would put hundreds of millions of pounds of investment at risk without relatively minor benefits.

Government should fund the demonstration and deployment of innovative solutions

Shore power will undoubtedly prove to be a valuable solution for some ports and terminals, or for some berths within these ports and terminals but even a limited roll-out this will require public funding and regulatory support. We believe that in locations where shore power proves valuable, it could be a precursor to innovation in the form of vessel charging. It may also necessitate or facilitate wider innovations in the form of smart grids or new storage solutions. In some ports, novel solutions will need to be found to provide power to ships at berth in the form of mobile solutions and/or solutions that are 'off-grid'. This strengthens the case for public investment further.

Government should undertake a study of energy network capacity in port areas

The lack of sufficient power and the extremely high costs of rectifying this is the primary barrier to shore power for many ports. As with transport and digital connectivity, we believe there is a role for government and other infrastructure operators in ensuring the infrastructure up to the port gate meets the needs of the industry.

High level studies for the DfT as part of the Clean Maritime Plan should be followed with more detailed examinations of the power needs of the maritime sector.



The current method for upgrading energy networks is also time consuming and expensive. A faster, more presumptive, more modular system is needed for both generators and users.

Tax and regulatory support for shore power is necessary

The cost of electricity was identified by BPA research in 2020 as one of the primary barriers to the lack of shore power in the UK. Even before recent price rises, electricity for high-usage industries in the UK was more than double than France, USA, the Netherlands or Sweden.

It has been our long-standing position that the Government should remove or cut taxes on electricity when used as a marine fuel or when used to create marine fuels that reduce emissions from ships at berth.

A zero-emissions berth standard pilot

Shore power ready vessels are becoming more common in some shipping sectors. We believe that there is merit in exploring a scheme that supports shore power in ports or terminals that regularly serve sectors with emerging demand. We would support a limited pilot scheme examining the viability of a zero-emission berth standard for some types of vessel that would be aligned with the polluter pays principle and meet the following conditions:

- Focused on one type of vessel that calls regularly at certain ports or terminals and are already using or ready to use shore power or zero emission at-berth solutions (cruise, containers, ferries, OSVs)
- Supported with up front Government funding that could be recouped through a levy on users
- Designed so as not to distort competition
- Aligned with the principles set out in our working paper examining at-berth emissions frameworks published in 2021 (appended).

The BPA remains committed to exploring these areas, and others, with industry colleagues and officials in a constructive manner and we would be happy to expand on any of the points in our submission.

Yours faithfully

A handwritten signature in blue ink that reads "Mark Simmonds".

Mark Simmonds

Director of Policy & External Affairs

BPA position on a potential UK ‘at-berth emissions standard’ pilot

Element	BPA Position
Public funding?	Critical. We are not aware of any commercial shore power projects that have been undertaken without public support. Public funding must be allocated on a competitive basis
Goal or technology based?	A goal based approach will encourage innovation and is at the heart of any successful at-berth emission regulation to some extent
Applicability	It is important that both ships and ports are treated equitably. Government should consider the role of terminals early in the process
Segments	It is best to begin with shipping segments that are already adopting shore power before regulating other segments, as has been the case everywhere else that at-berth emissions have been regulated
Sensible exemptions	The UK should consider exemptions for some ports or circumstances such as those not connected to the grid and not penalise ships when the infrastructure is not available.
Fleet-based?	Taking a “fleet”-based approach could stimulate innovative new approaches to reducing emissions and is worth exploring if it can be done in a way that is not overly burdensome
Protecting competitiveness	A holistic, cross-modal approach is important to avoid unintentionally increasing GHG emissions through reverse modal shift
Planning support	Given the timelines and costs associated with securing new energy capacity, Government should consider some accelerated process if shore power (and other energy-intensive emission reduction technologies) is to be required in the short term
Energy market rules	Some parts of current energy market regulation present barriers to roll out. Energy market regulation should be examined alongside the development of any at-berth regulations likely to result in a significant increase in shore power
Timeframe	There should be a sensible lead-in time for at-berth regulations, reflecting the significant costs and planning involved. A stepped approach would be appropriate and encourage innovation as ports are not forced quickly into existing solutions in a short timeframe