Transport decarbonisation in practice

CLdN's policy priorities

WORLD SUSTAINABLE TRANSPORT DAY 2026



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Executive summary

CLdN supports the transition to a lower-carbon transport system and shares the objective of achieving climate neutrality while preserving Europe's competitiveness, connectivity, and security of supply.

As one of Europe's leading multimodal logistics providers, CLdN has been preparing for the introduction of more stringent emissions norms for close to a decade. Thanks to significant capital investments in efficient vessels, port equipment and multimodal assets, we are today the lowest emitting, integrated maritime transport provider to the industry.

Effective climate policy should accelerate emissions reduction across the transport chain while maintaining a level playing field between operators and transport modes.

This paper outlines CLdN's positions on key regulatory initiatives shaping the future of maritime and freight transport. Across all policy areas, CLdN advocates for four core principles:

- **A level playing field between competing operators and transport modes.**
- **Technology-neutral pathways to decarbonisation.**
- **Regulatory alignment and harmonisation.**
- **Policies that support a modal shift towards lower-emission transport solutions.**

1. EU ETS and MRV

Context

The EU Emissions Trading System (ETS) and the Monitoring, Reporting and Verification (MRV) framework are central pillars of the European Union's maritime decarbonisation strategy. Together, they provide transparency on emissions and create economic incentives to reduce greenhouse gas emissions from shipping.

CLdN Position

CLdN supports robust carbon-pricing mechanisms for maritime transport and believes that all cargo vessels performing comparable transport activities should be subject to equivalent carbon-accounting and compliance requirements.

The current 5,000 GT threshold, and proposals that selectively extend ETS and MRV obligations only to certain vessel categories below that threshold, risk creating significant market distortions. Smaller vessels operating on the same freight markets as larger vessels can remain exempt from carbon costs despite competing directly with operators that are fully subject to ETS obligations. This can create incentives that favour smaller and often less carbon-efficient vessels, running contrary to the objectives of both fair competition and emissions reduction.

Carbon pricing should reward emissions efficiency, not vessel size.

Key Priorities

- Establish a genuine level playing field between operators performing comparable transport activities.
- Ensure that carbon-pricing mechanisms incentivise investment in larger and more carbon-efficient vessels.
- Fully align the scope of the ETS and MRV frameworks.
- Avoid distortions both within shipping segments and between competing vessel categories.
- Strengthen long-term investment certainty for decarbonisation.

Policy Recommendations

- Extend ETS coverage consistently across vessel categories between 400 GT and 5,000 GT.
- Ensure future expansions apply uniformly rather than to selected ship types only.
- Maintain full alignment between ETS and MRV requirements.
- Prioritise corrective measures that restore fair competition and strengthen decarbonisation incentives.

2. ETS2 and the Competitive Balance Between Road and Maritime Transport

Context

The European Union has consistently identified modal shift as an important tool for transport decarbonisation. Short sea shipping can reduce emissions, road congestion, infrastructure wear, and other external costs by moving freight away from roads.

However, maritime transport is already subject to carbon pricing through the EU ETS, while road freight remains outside an equivalent system pending implementation of ETS2.

CLdN Position

CLdN strongly supports the implementation of ETS2 without further delay.

The continued absence of carbon pricing for road transport creates an unfair competitive landscape within the freight sector. While maritime operators already bear carbon costs under the EU ETS, road transport continues to operate without equivalent carbon-pricing obligations despite also being an inherently less efficient transportation, emitting more per equivalent unit of work.

This divergence distorts modal choices, creates carbon leakage between transport modes, and risks shifting cargo towards more carbon-intensive transport solutions. Such outcomes run counter to the European Union's own transport and climate objectives.

Key Priorities

- Timely implementation of ETS2.
- A level playing field across transport modes.
- Consistent carbon-pricing signals throughout the transport chain.
- Support for sustainable modal shift.

Policy Recommendations

- Implement ETS2 according to the established timeline and avoid further delays.
- Ensure carbon-pricing principles apply consistently across competing freight transport modes.
- Evaluate climate policy measures on a system-wide basis, including modal-shift impacts.
- Maintain consistency between transport decarbonisation objectives and market regulation.

3. Shore Power

Context

Shore-side electricity can significantly reduce emissions, local air pollutants, and noise from vessels while at berth.

As ports and shipping operators invest in electrification infrastructure, shore power will become an increasingly important component of maritime decarbonisation.

CLdN Position

CLdN recognises shore power as an important decarbonisation tool where environmental benefits are clear and sufficient infrastructure is available.

However, successful uptake requires coordinated investment by ports, shipowners, utilities, and public authorities. Realising the full benefits of shore power also depends on adequate grid capacity and the availability of competitively priced electricity.

Key Priorities

- Availability of port infrastructure.
- Grid readiness and capacity.
- Competitive electricity pricing.
- Coordinated investment planning.
- Efficient implementation of regulatory requirements.

Policy Recommendations

- Accelerate deployment of shore power infrastructure at strategic ports.
- Ensure electricity pricing supports rather than discourages uptake.
- Support investments through targeted public funding and incentive mechanisms.
- Align port and vessel investment timelines to maximise utilisation and environmental benefits.
- Integrate shore power deployment into broader transport and energy planning.

4. FuelEU Maritime

Context

FuelEU Maritime establishes progressively stricter greenhouse-gas-intensity targets for the energy used onboard vessels calling at European ports. The regulation aims to drive the uptake of sustainable fuels and low-emission energy solutions through a technology-neutral framework.

CLdN Position

CLdN supports technology-neutral decarbonisation policies that allow operators to select the most effective pathway to reduce emissions.

Specifically on the topic of shore power as it relates to FuelEU Maritime, the framework correctly recognises shore-side electricity as having a greenhouse gas intensity of zero. However, the current compliance methodology may not adequately reflect its decarbonisation value when compared with alternative compliance pathways such as sustainable fuels.

The framework should ensure that incentives associated with electrification are commensurate with the investments and operational changes required to deploy it.

Key Priorities

- Technology-neutral compliance pathways.
- Appropriate recognition of the environmental benefits of shore-side electricity.
- Effective incentives for port and vessel electrification.
- Practical and transparent compliance mechanisms.
- Regulatory frameworks that drive the most effective decarbonisation investments.

Policy Recommendations

- Review the treatment of electricity within FuelEU Maritime compliance calculations.
- Assess whether current methodologies inadvertently favour low-carbon fuel substitution over direct electrification.
- Ensure investments in shore power infrastructure and vessel connectivity are adequately recognised.
- Monitor the impact of pooling mechanisms on the relative attractiveness of different decarbonisation technologies.

Supporting Considerations

CLdN's analysis indicates that achieving an equivalent compliance benefit through shore-side electricity can require substantially greater operational changes than the use of certain low-carbon fuels.

Similarly, under FuelEU Maritime's pooling mechanism, operating a single vessel on sustainable fuels can generate a greater fleet-wide compliance benefit than operating an equivalent vessel relying exclusively on shore-side electricity. This suggests that the framework may not fully reflect the decarbonisation value of electrification despite classifying electricity as a zero-emission energy source.

CLdN believes that these outcomes warrant further consideration as the implementation of FuelEU Maritime evolves.

5. UK ETS and Regulatory Alignment

Context

The United Kingdom and European Union are pursuing decarbonisation policies for shipping through emissions trading systems and related regulatory measures.

Given the highly integrated nature of UK-EU freight markets, the effectiveness of these frameworks depends not only on their environmental ambition, but also on the degree to which they are aligned. Divergent requirements can increase administrative complexity, compliance costs, and investment uncertainty for operators serving cross-border trade.

CLdN Position

CLdN welcomes efforts to strengthen cooperation and alignment between UK and EU carbon-pricing frameworks.

Recent progress towards linking the UK and EU Emissions Trading Systems demonstrates a shared commitment to reducing regulatory fragmentation and supporting a more coherent approach to decarbonisation. Greater alignment can improve efficiency, transparency and predictability for businesses operating across both jurisdictions, while helping to maintain a level playing field.

As maritime decarbonisation frameworks continue to evolve, CLdN supports further measures that enhance compatibility between UK and EU regulatory regimes, minimise unnecessary administrative burdens, and provide long-term certainty for investments in low-carbon transport solutions.

Key Priorities

- Effective implementation of UK-EU ETS cooperation and alignment.
- Regulatory coherence across maritime decarbonisation frameworks.
- Reduced administrative burden for cross-border operators.
- Long-term regulatory certainty and investment confidence.

Policy Recommendations

- Continue efforts to strengthen cooperation between UK and EU carbon-pricing systems.
- Minimise duplicate monitoring, reporting, verification and compliance requirements.
- Promote common approaches to emissions accounting and compliance administration where feasible.
- Consider the operational realities of cross-border freight transport when designing future climate policies.
- Pursue regulatory solutions that support both environmental objectives and the efficient movement of goods between the UK and the EU.

6. IMO Net-Zero Framework

Context

The International Maritime Organization (IMO) is developing a global framework to support the decarbonisation of international shipping and achieve its long-term greenhouse gas reduction objectives.

Because shipping is inherently global, international solutions remain the most effective means of reducing emissions while preserving fair competition.

CLdN Position

CLdN strongly supports the development of a global framework for maritime decarbonisation through the IMO.

The company believes that globally harmonised measures are preferable to a proliferation of regional schemes, which can increase administrative complexity, compliance costs, and regulatory uncertainty without necessarily improving environmental outcomes.

While a variety of proposals are currently under discussion, CLdN's primary priority is the establishment of a practical, predictable, and globally applicable framework capable of supporting long-term investment decisions.

Key Priorities

- Global rather than regional decarbonisation measures.
- Regulatory certainty and predictability.
- Technology-neutral compliance pathways.
- Practical and efficient compliance mechanisms.
- Alignment with existing frameworks where possible.

Policy Recommendations

- Prioritise a globally applicable framework that minimises regulatory fragmentation.
- Ensure compliance mechanisms remain practical and administratively efficient.
- Allow sufficient flexibility to accommodate evolving technologies and fuel pathways.
- Review targets periodically based on technological developments and fuel availability.
- Avoid unnecessary duplication with existing regional measures.

Long-Term Consideration

CLdN believes that a global framework closely aligned with existing compliance mechanisms, such as FuelEU Maritime, could significantly simplify administration and compliance for shipowners.

Building upon compliance structures already understood by operators would reduce regulatory complexity, improve predictability, and facilitate implementation across international fleets. While such an approach is not currently under consideration, alignment between future IMO measures and existing frameworks should be pursued wherever possible.

Conclusion

CLdN supports ambitious, pragmatic, and effective decarbonisation policies that deliver measurable emissions reductions while preserving Europe's competitiveness, connectivity, and supply-chain resilience.

Successful transport decarbonisation requires coherent policy design across sectors and jurisdictions. Carbon pricing should create fair and effective incentives, regulatory frameworks should be aligned wherever possible, and policies should support rather than hinder sustainable modal shift.

Across all of the initiatives covered in this paper, CLdN's objective is clear: to support a transport system that is lower carbon, economically efficient, internationally connected, and capable of delivering the investments necessary to achieve long-term climate goals.

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