To whom it may concerned,

Please find below the answer given by Dunkirk Port to the question n°11 of your *Consultation on an EU strategy for liquefied natural gas and gas storage*.

Question 11: What technological developments do you anticipate over the medium term in the field of LNG and how do you see the market for LNG in transport developing? Is there a need for additional EU action in this area to reduce barriers to uptake, for example on technology or standards, including for quality and safety?

In the short term, LNG market should develop thanks to the construction of retailed LNG truck stations. Theses LNG truck stations will allow supplying the road sector which would make easy the use of LNG as marine fuel by means of truck-to-ship transfer operations.

In the medium/long term, the development of the LNG as source of energy for ships is the best economical and environmental solution.
However, the different technological alternatives used to comply with the annexe VI of MARPOL (the scrubbers supported by low equipment costs and environmental rules still flexible concerning the waste processing or the MGO still rentable because of the low price of the petrol barrel) coupled with the lack of standards for the ship-to-ship transfer operations and the high retrofitting costs, make the develop of the LNG maritime supplying industry hard.
Every of these themes bring ship-owners about not to consider the LNG as an economical viable alternative face to scrubbers and/or MGO.

Making harder regulations regarding the waste processing of the scrubbers, elaborating standards more specifics to the LNG transfer operations (ship-to-ship and truck-to-ship) as well as increasing the petrol barrel price close to its historical level, would allow the LNG supply market growth easier.

Yours sincerely,

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