Concawe comments on the Clean Artic Alliance (CAA) Open Letter published on 23 January 2020.

Brussels, 29 January 2020: Concawe reviewed the letter from CAA and the quoted study, and believes that the key assertions made are unsupported by scientific and technical evidence.

There is currently no comprehensive overview available to document the real variability and quality of the low Sulphur Marine Fuels (MF) on the market. Hence, only earlier third party studies can serve to provide scientific and technical background to the question.

Two international studies published by CE Delft [1]and Ensys Energy [2] in 2016 for the IMO, concluded that 0.50%S MF is expected to be on average more paraffinic (therefore lower in aromatic content) than the original Heavy Sulfur Fuel Oil(HSFO), and show that the fuels tested in the German study[3] are not representative of average expected quality of MF produced by refineries around the world.

In fact, the German study appears to make the assumption used in a study from 2018[4] that low sulphur MF would typically have a higher aromatic content compared with 3.5% HSFO. This is questionable and in contradiction with the 2 above mentioned international studies. The German study is then based on engine tests performed with 0.50%S fuels specifically blended in laboratory to deliberately reach a very high aromatic content.

As a European refining Association we believe it is widely recognised in the fuels industry that the production process of Low Sulphur fuel oils primarily requires more hydrotreated components and that the hydrotreatment process, as well as reducing sulphur content, typically also reduces the aromatic content compared to HSFO.

The study referred to by the Clean Artic Alliance does not present any evidence that the test fuels are typical fuels on the market, it should therefore not serve as evidence to sustain their claims, and it seems premature to draw any valid and meaningful conclusions. Reducing the impact on the Arctic of black carbon emissions is on the agenda at the upcoming 7th session of the IMO's Sub-Committee on Pollution Prevention and Response.

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[1] CE Delft, « Assessment of Fuel Oil Availability", July 2016
https://cedelft.eu/publicatie/assessment_of_fuel_oil_availability/1858
[2] Ensys Energy, « Supplemental Marine Fuel Availability Study », July 2016
https://www.ensysenergy.com/downloads/supplemental-marine-fuels-availability-study-2/
[3] Study submitted by Germany & Finland to the IMO PPR on 15 November 2019.
[4] Combution quality of low-sulfur marine fuels after 2020 – will be better or worse? Koji Takasaki, Daisuke Tsuru, Chiori Takahashi & Tatsuo Takaishi (2018)