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Validity: Until further notice

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**Legal basis:**

Act on Environmental Protection in Maritime Transport (1672/2009, as amended); Regulation (EU) 2023/1805 of the European Parliament and of the Council of 13 September 2023 on the use of renewable and low-carbon fuels in maritime transport, and amending Directive 2009/16/EC; and Regulation (EU) 2023/1804 of the European Parliament and of the Council of 13 September 2023 on the deployment of alternative fuels infrastructure, and repealing Directive 2014/94/EU

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**Modification details:**

No changes. This interim guidance has been prepared at the request of stakeholders for support during the transitional period before the obligation to use on-shore power supply (OPS) becomes applicable in 2030. The guidelines define general principles for issuing Electricity Delivery Notes (EDN), taking into account current practices in the operating environment and needs during the transitional period. Instructional and more specific regulation is currently being prepared at EU level, and Traficom is actively involved in the process. Traficom monitors the progress of the regulatory drafting process and assesses related needs to update the present guidelines.

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## **Interim guidelines on Electricity Delivery Notes (EDN)**

### **Contents**

<b>Interim guidelines on Electricity Delivey Notes (EDN)</b> .....	<b>1</b>
<b>1 Background and objectives</b> .....	<b>1</b>
<b>2 EDN creation</b> .....	<b>2</b>
<b>3 Required minimum set of information and responsible parties</b> .....	<b>3</b>
3.1 Information on electricity delivery at the supply point in question .....	3
3.2 Port call information .....	3
<b>4 Conclusion</b> .....	<b>4</b>

### **1 Background and objectives**

The provisions of the Act on Environmental Protection in Maritime Transport (1672/2009, as amended) implement Regulation (EU) 2023/1805 on the use of renewable and low-carbon fuels in maritime transport (FuelEU Maritime). The limit on the greenhouse gas (GHG) intensity of energy used on board by a ship became applicable on 1 January 2025. The use of on-

shore power supply (OPS) or zero-emission technology will become mandatory for passenger ships and containerships during port calls from 1 January 2030 in ports covered by the AFIR Regulation ((EU) 2023/1804) and from 1 January 2035 in all EU ports where OPS is available. If a ship intends to include OPS in its GHG intensity calculation, the related Energy Delivery Notes (EDN) must comply with the requirements of Annex I to the FuelEU Maritime Regulation.

These guidelines have been prepared to support parties planning to use OPS before the obligation enters into force in 2030. The document outlines the key principles of issuing an EDN, taking into consideration the circumstances during the transitional period and prevailing practices. Efforts have been made to address differences between port- and connection-specific approaches, accommodate the practical needs of parties and meet regulatory requirements. In the current national operational context, this data is provided by various parties – such as port authorities, electricity suppliers, electricity vendors and shipping companies – either independently or collaboratively. Traficom encourages companies to collaborate with key stakeholders to find appropriate solutions that comply with the Regulation and are verifiable. It should also be noted that some of the required information may overlap with reporting obligations under the MRV Regulation (EU) 2015/757.

## **2 EDN content**

Issuing EDNs cannot be delegated to a solely responsible party, as the necessary information is held by various entities. Therefore, Traficom considers that an EDN, as required by the FuelEU Maritime Regulation, consists of two information components:

- I. information on electricity delivery at the relevant supply point, and
- II. ship-specific information on port calls during the electricity billing period.

This information shall be delivered to the verifier as agreed by the relevant parties. The parties must ensure that the consolidated information meets the verifier's requirements and includes the minimum set of information required of an EDN.

To reduce the administrative burden, an EDN may cover multiple periods of OPS use within a single billing period, e.g., one month.

### 3 Minimum required information and responsible parties

Annex I to the Regulation outlines the mandatory information that an EDN must at least include. In the current national operational context, this data is provided by various actors – such as port authorities, electricity suppliers, electricity vendors and shipping companies – either independently or collaboratively. Consequently, it is essential to examine how the responsibility for generating and delivering the information is shared among these parties. The information must be accurate, verifiable and legally confirmable, and it must be delivered to the verifier in accordance with the agreed procedure.

#### 3.1 Information on electricity delivery at the relevant supply point

The information at the relevant supply point must include, at minimum:

- **Hourly time series data for the billing period**
- **Supplier** (name, address, telephone number, email address, representative)
- **OPS connection point** (connection point details<sup>1</sup>)
- **OPS time** (date/time of commencement/finalisation)
- **Energy supplied** (power fraction allocated to supply point (if applicable) [kW], electricity consumption (kWh) for the billing period, peak power information (if available))
- **Metering**<sup>2</sup>

#### 3.2 Port call information

A company or port authority must provide the verifier with the following information:

- **Receiving ship** (IMO number (MMSI), ship name, ship type, flag, ship representative)
- **Port** (name, location (LOCODE), terminal/berth)
- **Port call information for the supply point** (arrival and departure dates and times)

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<sup>1</sup> At the time of publishing these guidelines, the required level of detail for reporting the connection point has not yet been confirmed. Traficom will update the guidelines once the requirements are defined.

<sup>2</sup> At the time of publishing these guidelines, the exact meaning of 'metering' in the context of the reporting obligation has not yet been confirmed. Traficom will supplement the guidelines when the requirements are defined.

A company may agree with the verifier that port call information is confirmed using systems such as Porttraffic: <https://www.porttraffic.fi/>.

#### **4 Conclusion**

Given the shared nature of responsibilities and the procedures involved in supplying the required information, it is currently not feasible to designate a single party as solely responsible for producing the EDN. Instead, the EDN consists of information managed by various entities, collectively fulfilling the minimum information requirements of Annex I to Regulation (EU) 2023/1805.

Parties responsible for information on electricity delivery at the relevant supply point and on port calls ensure that their respective data is accurate and verifiable. As a rule, the ship is responsible for further submitting the information to the verifier, unless another arrangement is agreed upon. Traficom considers the outlined procedures to meet the requirements set in the FuelEU Maritime Regulation to ensure that the Electricity Delivery Note (EDN) is reliable and legally confirmable.

*This guidance is based on the interpretation of the EDN requirements included in the Regulation prevailing at the time of publication of this document. The guidance represents the competent authority's view of how the requirements can be met during the transitional period from 1 January 2025. Traficom reserves the right to update the guidance in accordance with further instructions and regulatory developments at EU level during the transitional period. This guidance is temporary and valid until Traficom replaces it with new guidance or cancels it as unnecessary. Traficom encourages stakeholders to inform the agency of any shortcomings they notice in the guidance or any ideas they may have for improving the document.*