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**CLIA COMMENTS ON THE CLEAN FUELS PROGRAM RULE, CHAPTER 173-424  
WAC**

Dear Mr. Saul,

CLIA, on behalf of our cruise line members operating globally and regionally, appreciates the opportunity to submit comments on the Washington State Department of Ecology's proposed amendments to the Clean Fuels Program Rule (Chapter 173-424 WAC), as outlined in the Preliminary Regulatory Analyses (Publication 25-14-039, June 2025).

CLIA recognizes and supports the goals of the Clean Fuels Program to reduce greenhouse gas emissions from the transportation sector through the promotion of low-carbon fuels. Consistent with the IMO's Strategy for the reduction of GHG emissions from ships, our cruise line members are committed to ambitious decarbonization goals, including pursuing net-zero emissions by 2050, and work in parallel with both global and regional regulatory frameworks to support this objective.

We respectfully offer the following comments and recommendations regarding the proposed amendments:

The proposed rule amendments reference “alternative jet and marine fuels” and suggest potential implications for book-and-claim biomethane and e-methane accounting and credit generation; similar considerations should apply to biomethanol and e-methanol. However, the treatment of marine fuels remains unclear. We encourage the Department to clarify how marine fuel pathways, including those used by cruise and other deep-sea operators, will be assessed under the program. This should include guidance on credit eligibility, fuel pathway certification, and cross-jurisdictional compliance. Clear and transparent rules regarding marine bunkering and port-related activities are essential to prevent confusion or unintended exclusion of marine operators from incentive mechanisms. In this context, we also encourage consideration of fiscal incentives, such as a reduced tax for low-carbon marine fuels similar to the approach adopted at the Port of Rotterdam, to further support adoption and competitiveness.

CLIA notes that the baseline rule, WAC 1730424-600, outlines the requirements for establishing carbon intensity values for fuel pathways. These include the use of the required WA-GREET model for carbon intensity calculations, the timeline for Ecology’s review of these values, the establishment of carbon intensity benchmarks, and alternative fuel pathways classifications. While these measures are intended to improve the program’s rigor, we encourage alignment with international standards, particularly the lifecycle assessment (LCA) guidelines currently being developed by the IMO. Coordination with IMO workstreams will help minimize administrative burden and promote consistency for globally operating vessels already subject to international fuel reporting requirements.

CLIA requests that the transient nature of cruise ship operations be taken into account when considering the proposed amendments. Cruise lines may only call periodically at Washington State ports and often procure fuel outside the state. Any future reporting or compliance mechanisms should be appropriately scaled to reflect this operational reality, avoiding unintended costs or administrative complexity for vessels with minimal or seasonal presence in the state. CLIA strongly supports a fuel- and technology-neutral approach to regulation. The proposed program should offer flexible compliance pathways, enabling industry to adopt innovative fuel and energy solutions that best suit their operational needs while achieving real emissions reductions. Overly prescriptive approaches may limit viable options or stifle emerging low- and zero-carbon technology investment in the maritime sector.

CLIA notes the rule’s stated goal of expanding participation and enhancing credit accessibility. As marine fuels evolve and cruise lines invest in ships that can operate on cleaner energy sources—including LNG, biomethane, synthetic methane, other biofuels, green methanol, and shoreside renewable electricity—it is essential that crediting frameworks remain accessible to early adopters and reflect measurable improvements in carbon intensity. We encourage the Department to maintain opt-in pathways for marine operators and ensure that the maritime sector’s contributions to decarbonization are recognized equitably within the program.

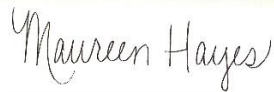
Any attempt to regulate marine fuels, particularly those procured out of state, raises significant preemption concerns. In *United States v. Locke*, 529 U.S. 89 (2000), the Supreme Court held that States may not regulate matters related to the design, construction, equipping, crewing, or operation of vessels, which includes fuel choice. Such authority rests exclusively with the Federal Government. While *PMSA v. CARB* introduced some complexity regarding emissions

standards, those rules addressed emissions, not fuel selection. As such, state-level regulation in this area may be subject to substantial legal challenge.

CLIA appreciates the Department's commitment to public consultation and its efforts to advance clean fuels in Washington. We welcome continued dialogue on how this rulemaking may affect the maritime sector and remain available to collaborate as implementation progresses.

Thank you again for your ongoing collaboration and support. Cruise Lines International Association (CLIA) is the world's largest cruise industry trade association, providing a unified voice and leading authority of the global cruise community. The association has 15 offices globally with representation in North and South America, Europe, Asia, and Australasia. CLIA supports policies and practices that foster a safe, secure, healthy, and sustainable cruise ship environment for 31.7 million passengers who cruise annually and is dedicated to promoting the cruise travel experience. The CLIA Community is comprised of the world's most prestigious ocean, river, and specialty cruise lines; a highly trained and certified travel agent community; and cruise line suppliers and partners, including ports & destinations, ship development, suppliers, and business services. The organization's mission is to be the unified global organization that helps its members succeed by advocating, educating, and promoting for the common interests of the cruise community.

Sincerely,



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Cruise Lines International Association (CLIA)