

Cross boarder bunkering ARA

A practical and regulatory guide to bunkering operations in the ARA, outlining the applicable legal framework and providing operational guidance on licensing, organisational requirements, administrative obligations, and day-to-day procedures.

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Introduction

Introduction of Methanex' business activities, the purpose of this document etc.

Glossary

Term	Definition
ARA	The region covering the port of Amsterdam, Rotterdam and Antwerp
MFE	Methanex Fuels Europe B.V.
Methanex	The global Methanex group
Non-Union customs status	T1
Union customs status	T2

General introduction

Methanex is the world's leading producer and supplier of methanol, serving major international markets across North America, Asia Pacific, Europe, and South America. Headquartered in Vancouver, Canada, Methanex operates an extensive global supply chain and distribution network, including multiple production sites, terminals, storage facilities, and a fleet of methanol ocean tankers.

MFE is a subsidiary of Methanex, established in Amsterdam, the Netherlands. It plays a key role in logistics and the distribution of methanol within the region. As part of its business activities, MFE supplies methanol as fuel to seagoing vessels and is developing its bunkering activities to serve the ARA region (Amsterdam–Rotterdam–Antwerp).

To supply methanol to vessels across the ARA region, a comprehensive framework of licenses and procedures is required from a customs and excise perspective. In designing this framework, other relevant factors such as business operations and renewable energy legislation must also be taken into account.

This document outlines the required licenses and authorisations, procedures, working instructions, controls, and other regulatory and operational considerations related to MFE's cross-border bunkering activities in the ARA region.

Legal assessment bunkering activities

Outline of business activities and impact from a legal requirements and facilitations perspective.

Business objectives

Describe outcome of discussion on business objectives. Is the business case solely centered around the supply of bunkerfuels, or is the incentive of methanol being considered a renewable fuel, under conditions, also a consideration? In light of the emission reduction tickets and their value.

Based on the objective the legal aspects will be considered on accommodation the relevant scenario('s).

AO/IC

Description of the Administrative Organisation and Measures of Internal Control (AO/IC)

Outline of Business

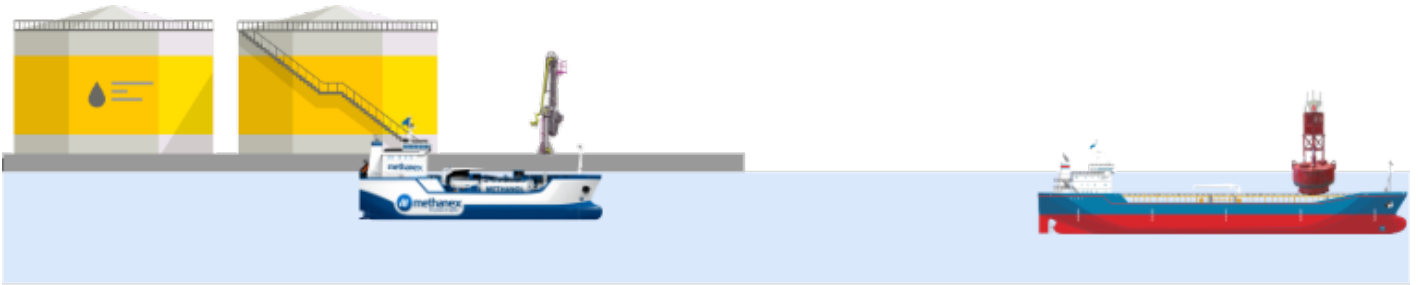
Activities: NL vs. NL/BE

Bunkering

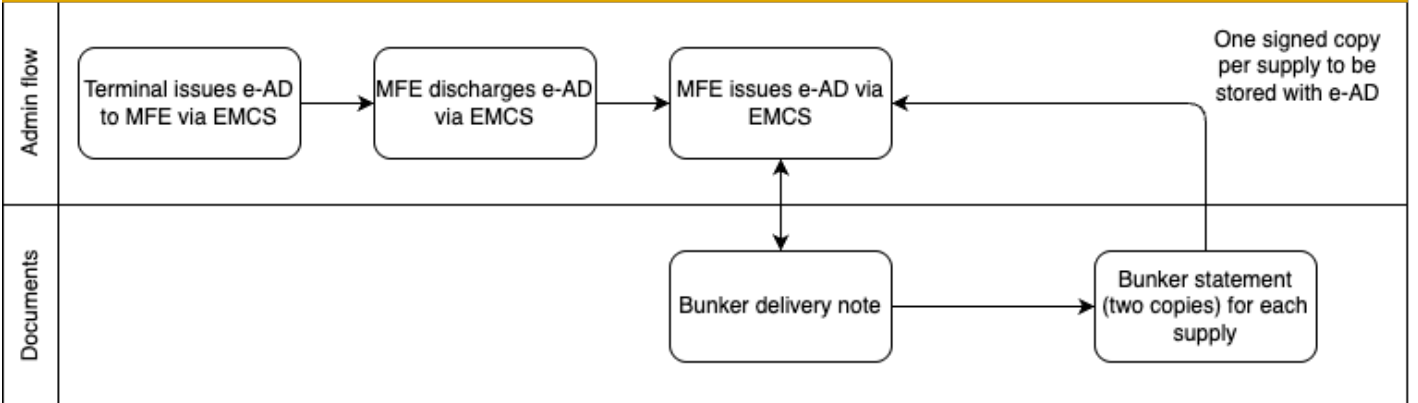
The application of the “Zeevaartbunkerprocedure 2019” is driven by the objective of enabling bunkering activities in both Belgium and the Netherlands. If bunkering activities were to take place exclusively in the Netherlands, a different procedure would apply.

As this distinction may be relevant from a sustainability perspective—which in the Netherlands is linked to the release for consumption from a tax warehouse—the procedure for bunkering without application of the “Zeevaartbunkerprocedure 2019” is described first below.

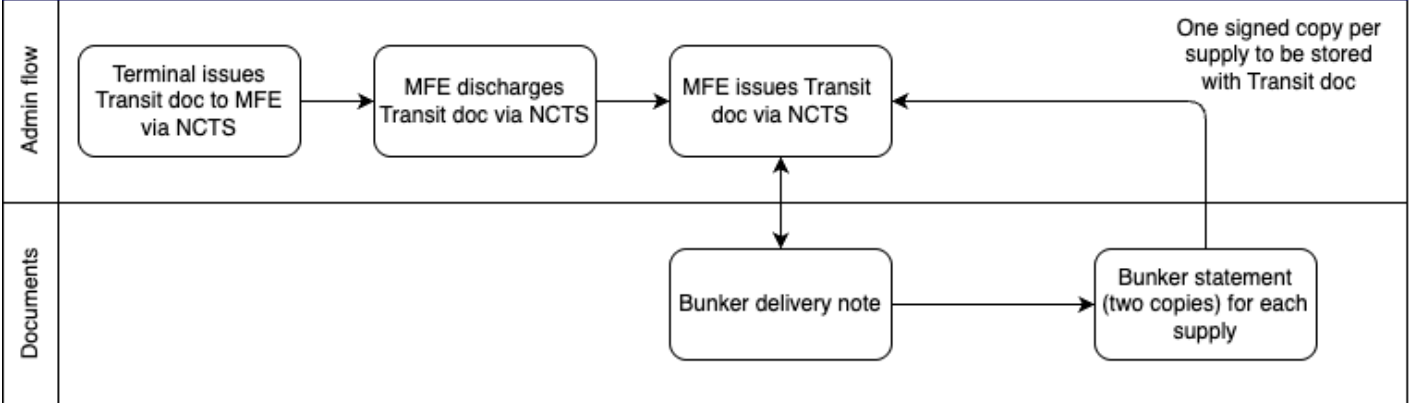
1. Bunkering in the Netherlands without application of the “Zeevaartbunkerprocedure 2019”



T2 Bunkers



T1 Bunkers



1.1 Required Licenses

- **Fictitious excise warehouse (Fictief AGP):**

License required to **load T2 (EU) bunker fuel in the Netherlands** and supply it as bunker fuel to vessels in the Netherlands.

- **Uitbunkeren in transit (T1 bunkering):**
License required to **load T1 (non-EU) bunker fuel in the Netherlands** and supply it as bunker fuel to vessels in the Netherlands.
- **To be verified need of additional license?** https://www.douane.nl/wp-content/uploads/2025/10/toel_aanvr_toe_proviandering_terr_water_do2441b3fd.pdf
- **Licenses electronic communications?**

1.2 Scope of the Licenses

- These licenses **only allow loading and supplying bunker fuels in the Netherlands.**
- **Cross-border bunkering is not permitted.**

1.3 Transit (T1 Bunkering)

- Under the simplified T1 procedure, **bunker fuel on the barge is covered by an NCTS Transit document.**
- The bunker supplier must **place the goods under Transit** when loading.
- This process can be **outsourced to a customs broker.**

1.4 Supply to Other Bunker Suppliers (T1 Bunkering)

- Unlike the cross-border procedure, the domestic T1 procedure **allows bunker fuel supply from one bunker trader to another via ship-to-ship operations.**
- **Note:** This does **not extend the validity** of the original Transit document.

1.5 Formalities During Supply (T1 and T2 Bunkering)

- **Advance notification:** Customs must be notified **at least 2 hours** before the expected supply time.
- **Document type:**

To be verified based on License

- **Required information:**
 - EORI number of the bunker supplier
 - Name and IMO number of the receiving vessel
 - Expected time of supply
- **Submission:** Advance notification must be submitted as an electronic **PRO message** via the **Single Window Maritime platform**.
- **Attention:** Registration of electronic messages (**registratie elektronisch berichtenverkeer**) is required.

1.6 Clearance of the Procedure (T1 Bunkering)

- The procedure is considered **cleared** when **bunker receipts covering the full quantity** are attached to the Transit document within its validity period.
- **Late or incomplete attachment** results in non-clearance, which may trigger **import and excise duty assessments**.

1.7 Bunker Receipt (T1 and T2 Bunkering)

The bunker receipt is **critical documentation**, serving as:

- Evidence that the fuel was **supplied to a seagoing vessel**. **Verify supply to barges covered?**
- Proof that the goods **have left EU customs territory**, clearing duty suspension procedures.

Requirements:

- **Two copies** per supply
- **Languages:** Dutch, English, German, or French
- **Format:** No fixed format; customs provides a **minimal data content list**
- **Numbering:** Unique and sequential
- **Signature:** Authorized crew member of the receiving vessel
- **Distribution:**
 - One copy stays on the vessel
 - One copy stays on the bunker barge until the BGD quantity is fully supplied
 - Replacing the original copy on the barge with a duplicate is allowed
- **Retention:** Keep records for at least **7 years**

1.8 E-AD Document (T2 Bunkers)

- EU bunker fuel on the barge is covered by an **e-AD**, equivalent to the T1 Transit document.
- **Issuance:** Loading terminals issue an e-AD via EMCS to the bunker supplier.
- The bunker supplier **replaces it with its own e-AD** for the fuel on the barge.

Clearance: Attaching bunker receipts to the e-AD clears the procedure, **similar to Transit document clearance.**

2. Bunkering in the Netherlands or Belgium with application of the “Zeevaartbunkerprocedure 2019”

2.1 Required Licenses

- **Authorized bunker company (Erkend Bunkeraar):**

License required to **apply the Zeevaartbunkerprocedure 2019**, which allows for cross-border bunkering between The Netherlands and Belgium

- **Fictitious excise warehouse (Fictief AGP):**

License required to **load T2 bunker fuel in the Netherlands** and supply it as bunker fuel to vessels in the Netherlands

- **Floating customs warehouse (Varend douane entrepot)**

License required to **load T1 bunker fuel in the Netherlands** and supply it as bunker fuel to vessels in the Netherlands or in Belgium.

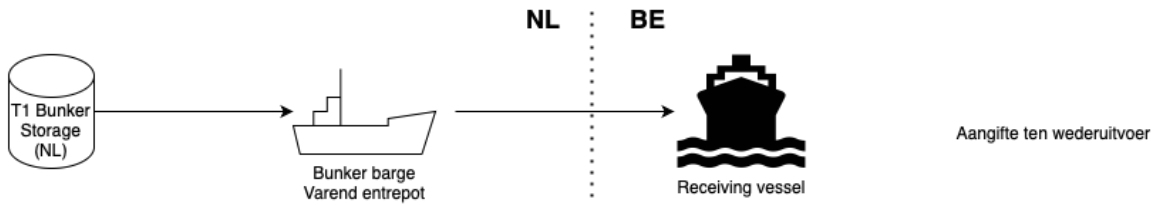
- **Electronic messaging registration (Registratie elektronisch berichtenverkeer):**

Registration required to communicate with the declaration and notification system of the Dutch Customs Authorities.

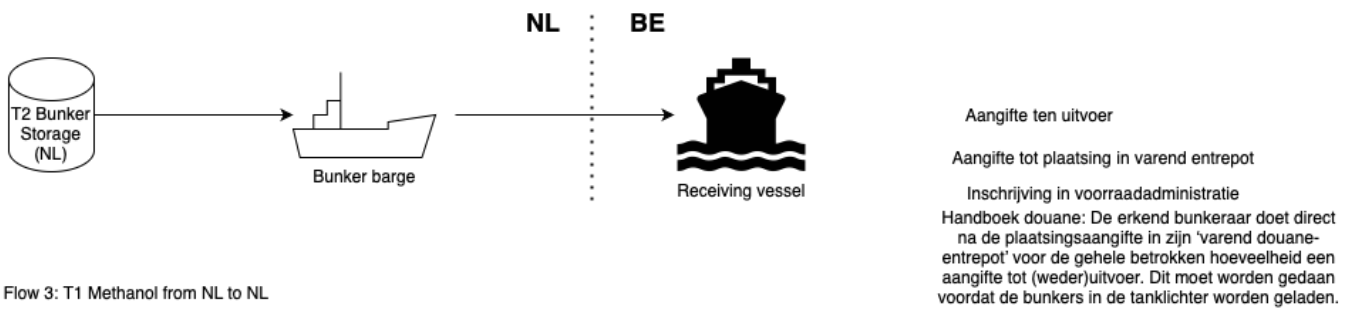
Outline business activities

MFE's bunkering operations in the ARA-region consists of the following flows.

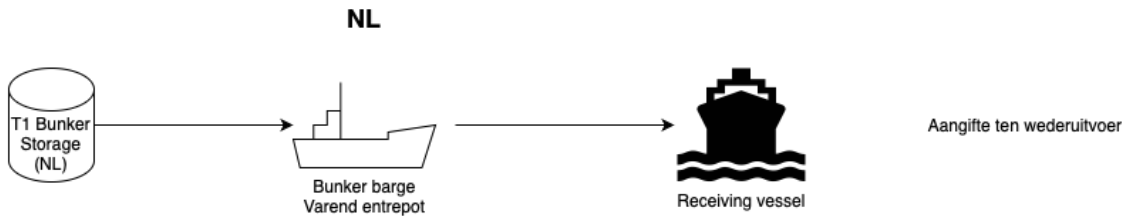
Flow 1: T1 Methanol from NL to BE



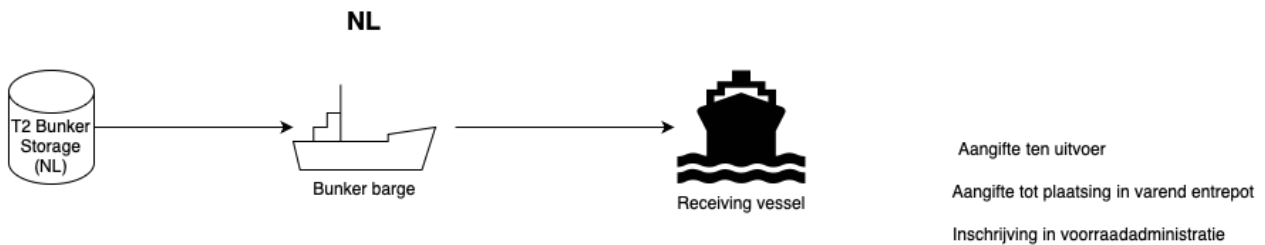
Flow 2: T2 Methanol from NL to BE



Flow 3: T1 Methanol from NL to NL



Flow 4: T2 Methanol from NL to NL



Flow 5: Return flow



AO/IC

Product and it's characteristics from a Customs and excise point of view

Describe applicable taxes

AO/IC

Licenses

Identify licenses required taking into account the business activities and the objective. Include summary of what each license entails and reference to application forms.

AO/IC

Organisation - People

People, professional qualifications, roles and responsibilities. Training.

AO/IC

Organisation - Control Framework

Control framework, IT systems, Procedures and Work instructions.

AO/IC

Organisation - Third parties

Brokers

AO/IC

Details on various flows

Per flow description of steps in the process. T1 vs T2, which licenses, when what declarations.
Exception such as product returning to Terminal instead of bunkering. NL vs BE.

Procedures

Work instructions