



D. 2816/07
SF 3.402

GREEN PAPER TOWARDS A FUTURE MARITIME POLICY FOR THE UNION **Replies to questions**

INTRO

Q- Should the EU have an integrated maritime policy?

An integrated maritime policy based on a holistic approach is useful if contents take into account the importance of the relevant sectors for the European Union and for the daily life and the wealth of its citizens. In this context, the Lisbon Policy of making Europe the most competitive and efficient trading entity in the world should be the basic theme of the holistic approach.

In line with the policy promoted by Vice President Günther Verheugen, new measures at EU level should only be introduced if and when they have a clear added value in the context of the above mentioned philosophy.

Q- How can the EU add value to the many national, local and private initiatives which already exist in the maritime field?

Evidently, the response to the previous question is also valid for this question. In a practical way, best practices should be exchanged and good examples taken on board where appropriate.

As far as legislation is concerned, we support the suggestions that superfluous legislation and/or legislation with no added value should be abolished and not be created.

Shipping being an international business means that international rules and regulation are the only way to create added value. Existing international legislation should be ratified, applied and its application correctly controlled.

2. RETAINING EUROPE'S LEADERSHIP IN SUSTAINABLE MARITIME DEVELOPMENT

2.1. A Competitive Maritime Industry

Q- How can European maritime sectors remain competitive, including taking into account specific needs of SMEs? What mechanisms should be in place to ensure that new maritime development is sustainable?

The European shipping sector is de facto an international sector operating in the global market and competing with international competitors. The legal competitive

framework (guidelines), that exists today, should remain stable offering an attractive operational environment for shipping. Unpredictable and frequent changes make it difficult to conduct long term planning on which investments are based and to optimise maritime transport. Protectionist measures must be avoided since they can produce an undesirable protectionist race at global level in markets that are free by their very nature.

In addition, on this question we wish to reiterate that the Lisbon Policy/Strategy should be applied in all sectors of the maritime cluster. This is also valid for ports and port services being key elements in the logistic chain. In respect of the latter, it is essential that ports can expand and that the necessary hinterland connections are available. Procedures on environmental considerations should be relevant and be dealt with in a reasonable time.

2.2. The Importance of the Marine Environment for the Sustainable Use of our Marine Resources

ECSA shares the view in the Green Paper that the preservation of Europe's marine resources is vital to improving the EU's competitiveness, long-term growth and employment, and that the main challenge of EU Maritime Policy is to enable economic expansion in a sustainable manner. In that context, it makes sense, of course, that the different interests and elements affecting such matters are integrated to the extent that a consistent approach is put forward at Community level.

Q- How can maritime policy contribute to maintaining our ocean resources and environment? How can a maritime policy further the aims of the Marine Thematic Strategy?

As the central environmental pillar of the Green Paper ECSA shares the overall objective of the Marine Thematic Strategy to protect and restore Europe's oceans and seas and ensure that human activities are carried out in a sustainable manner. As recognised by the Lisbon Strategy, sustainable development must be accompanied by the goals of promoting competitiveness, economic growth and development across Europe. In the latter regard, the principle of freedom of navigation is a fundamental requirement for free trade and competition together with unrestricted port access.

It is furthermore accepted that from an environmental point of view, it is sensible to subdivide the overall marine area of the EU into regions in order to establish what is required for each region, acknowledging that what is necessary or best in one region may not be necessary in another region. However, from the perspective of international shipping, having ships operating in all four regions (Baltic Sea, North-East Atlantic, the Mediterranean and Black Sea) it is important to ensure that this approach does not result in a myriad of varying rules for shipping within the EU. Such a situation would not be operationally feasible for the shipping industry and likely to conflict with international provisions. In addition, it could result in distortions to trade, placing shipping companies flying EU flags at a disadvantage compared to their non-EU flag competitors. It is therefore vital that Member States avoid this potential adverse consequence when implementing the strategy.

Most European waters have no physical boundaries to outside sea areas and therefore are affected by those areas. Furthermore, large parts of the four marine regions are international waters and cannot be fully protected by EU regulations only. Therefore, protection of these waters is best achieved through international regulations applying to all ships regardless of flag and port of call.

In pressing for an international approach to environmental protection, it is accepted that different regions have different environmental susceptibilities and ambitions. EU coastal states should assess and document their environmental vulnerability, e.g., in applying for SECA designation. In this context, the element of the strategy to enhance the knowledge base by pursuing a new approach to marine monitoring and assessment is welcome, as is the goal to increase cooperation with third countries bordering EU waters and with existing regional seas Conventions.

What is vital in ECSA's view is that regional and local quality problems are debated and covered within the international framework and that EU Member States commit themselves to this approach. As regards specific measures to promote and further enhance maritime safety and the protection of the marine environment, binding rules should not be the only option. Organised industry groups should be encouraged to develop voluntary initiatives and best practice.

In the wider context EU Maritime policy over the last decade has rightly recognised the need to take full account of the prime regulatory role of IMO for international shipping, in which EU shipping has a large stake. It is vital for the continued health of European shipping that this approach is continued. While the very large majority of EU safety and environment legislation has over the last decade or more reflected the content of international instruments, there have been a few regrettable exceptions in recent years, notably certain elements of the sulphur directive (2005/33) relating to passenger ships and to fuels used in ports, which are inconsistent with the international rules.

It is important that maritime safety policy continues to place emphasis on the enforcement of internationally agreed rules rather than seeking to introduce measures which are inconsistent with the global approach.

ECSA urges Member States to ratify international Conventions as a priority and supports initiatives by the Commission with this goal; such ratification can significantly raise global standards and it is regrettable that, to-date a number of Member States have yet to ratify important Conventions. In particular, ECSA would cite the IMO Anti Fouling Systems (AFS) and Ballast Water Management (BWM) Conventions, MARPOL Annex VI (prevention of atmospheric pollution), the Limitation of Liability of Maritime Claims Convention (LLMC), the Liability and Compensation for Damage in Connection with the Carriage of Hazardous and Noxious Substances by Sea (HNS) Convention and the Bunker Oil Spills Convention (BOC). ECSA would propose that the Commission and the Transport Council regularly assess the state of play of ratification of these Conventions with the information being made publicly available.

2.3. Remaining at the Cutting Edge of Knowledge and Technology

Q- How can a European Marine Related Research Strategy be developed to further deepen our knowledge and promote new technologies? Should a European Marine Research Network be developed?

Research and development is central to innovation, not least for maritime transport. While innovation primarily is the responsibility of individual companies to improve their efficiency and competitiveness, there are many aspects where joint approaches between operators, suppliers of equipment and research institutes, are necessary, for reasons of expertise, consultation and costs. Suppliers and specialised institutions rather than shipowners will most often undertake technological research, although operational requirements and priorities must be closely consulted on and results tested. ECSA's main role lies in this supportive consultation and setting of priorities.

Research and development rightly plays an important supporting role for creating expertise and for stimulating the competitiveness of the EU under the Lisbon Strategy set by the Commission and Member States. It is notable that the 7th R&D Framework Program has been allocated a substantially higher budget than the previous programs. Reference should be made to the Technology Platform (TP) WATERBORNE, which developed and published a 'Vision 2020' followed by a 'Strategic Research Agenda'.

TP WATERBORNE is the forum where all the stakeholders involved in the waterborne transport (maritime and inland navigation) develop consensually a medium to long-term vision for the maritime industry and waterborne transport and operations. Together, they assess the main challenges, formulate the R&D actions to be fulfilled for meeting these challenges in a strategic research agenda, and promote the mobilisation of the necessary resources.

Against this background, ECSA considers that experience with TP WATERBORNE should be gained before considering whether there is a need to establish a European Marine Research Network.

While ECSA members have acknowledged the importance of R&D, they have at the same time identified the need for greater transparency to assist industry understanding and the difficulties in maintaining a good oversight of the many initiatives and developments at national and at Community level.

Q- What mechanisms can best turn knowledge into income and jobs?

See replies under 2.5.

Q- In what ways should stakeholders be involved?

Through TP WATERBORNE, a point of entry has been created for maritime research. This point of entry should be used thereby avoiding duplication. The creation of new R&D fora will further complicate matters. Transparency in European co-funded R&D is necessary and must be further improved. This will also contribute to avoiding wastage by useless projects in areas or on topics already examined

sufficiently or marketed competitively. Whilst not discarding the value of developing knowledge over the longer term, research projects should have added value for the industry and not only be to the benefit of academics, researchers and consultants.

If the above conditions are fulfilled stakeholders will automatically show interest and be involved in research projects having added value for the industry.

2.4. Innovation under Changing Circumstances

Q- What further steps should the EU take to mitigate and adapt to climate change in the marine environment?

As acknowledged in the Green Paper, shipping is the most energy efficient and environment friendly mode of transport in Europe. Nevertheless, the shipping industry is aware of the unprecedented pressure both in the EU and internationally on the industry to conform to lower limits than those recently made mandatory by MARPOL Annex VI.

It is against this background that the shipping industry is committed to further improving its environmental performance where there is a quantifiable benefit backed up by thorough impact assessments. In doing so, ECSA believes that international solutions offer the most sustainable long term way forward and notes that more stringent global controls on emissions are being actively addressed in the current review of MARPOL Annex VI. It also notes that discussions on CO₂ emissions in the context of Kyoto Protocol targets will also take place at the IMO.

The shipping industry is committed to taking a constructive and proactive stance in the revision of MARPOL Annex VI. In the EU context, ECSA has long been urging that Member States ratify Annex VI, it being regrettable that to-date only some 13 EU countries have done so. Such efforts have been taken against the background that the entry into force of MARPOL Annex VI (May 2005) would have the positive consequence of opening up the Convention to amendment.

Air pollution in general is a complex issue and reducing one pollutant may have a negative effect on other pollutants such as Greenhouse Gases (GHGs). The industry therefore believes that a holistic international approach to find an overall environmental benefit for the long term is the only solution. In this context, there is scope for regional action on the international front through the possible creation of SECAs after thorough assessment of environmental vulnerability. It should, however, not be overlooked that it is unsustainable for EU ships to be subject to a myriad of differing levels of emission control in different ports around the world.

As stated above, credible long term action must be based on sound environmental, technical, economic and social assessments. All measures to reduce maritime emissions must be as cost-effective as possible. Particular account should be taken of the global availability and cost implications for industry of the new fuels required, and where new technology is introduced as a requirement it is crucial to ensure that it has been fully developed and is reliable. Any measures introduced should not result in a modal shift in Europe from waterborne transport to less environment friendly modes of transport.

EU Member States have a significant individual influence in IMO and ECSA would urge that such influence is used to promote the action described and, particularly, to ensure that measures put forward are fully backed up by credible evidence of environmental need. The Commission and more particularly EMSA can play an important role in that regard.

The shipping industry is committed to further improving its environmental performance. By having this proactive stance, it is continuously assessing the different options available to the industry to reduce air emissions. Having undertaken this exercise, the following conclusions have so far been reached:

Firstly, there are promising developments taking place with regard to technologies to reduce SO₂, NO_x, PM and VOC emissions. Such developments should be promoted and fully exploited. For example, improved fuel treatment and use of scrubbing of exhaust gases will ensure that only the minimum levels of harmful gases are released in the atmosphere.

Secondly, there are promising developments taking place in EU and IMO concerning new and cost-effective economic incentives which provide alternatives to the traditional “command and regulate” approach. The new possibilities created by those instruments should be preferred to new regulations, especially regional regulations, when the same or better environmental results can be achieved.

Thirdly, there is no single option available to the industry that will be suitable for all types of ship and the variety of trades in which they operate.

Fourthly, it is important for the international and EU framework to allow flexibility for the industry to find the most cost effective solutions.

Fifthly, existing legislation should be implemented as soon as possible and new legislation should not be brought forward until the effectiveness of existing legislation has been properly assessed and measured.

2.5. Developing Europe's Maritime Skills and Expanding Sustainable Maritime Employment

Q- How can the decline in the number of Europeans entering certain maritime professions be reversed and the safety and attractiveness of jobs ensured?

While shipping and seafaring have always been international, the increasing reality of globalisation presents particular challenges in the area of maritime employment in a generally high labour cost Europe. The need to ensure that European shipping can continue to effectively and fairly compete in the global market must always be the cornerstone of the EU policy in this area. Such an approach is fully consistent with the EU Lisbon Agenda which aims at making the EU the most competitive economy in the world. It should also be borne in mind that maritime employment ashore far exceeds employment on board of ships. Ensuring that shipping companies and the wider maritime cluster can prosper is consequently particularly important in this context.

A key element in relation to seafarer employment is a recognition that labour flexibility is in the interests of Europe's longer term sustainable growth. This is particularly relevant for shipping operating in a global competitive environment with a global market for seafarers. ECSA believes that shipowners should be able to employ qualified seafarers from around the world, given the global context in which they operate. The alternative approach of promoting restrictive measures in an attempt to preserve the jobs of European seafarers would have the opposite effect to that intended. It would lead to lack of competitiveness, loss of markets, a shrinking of EU fleets and, inevitably, to loss of European jobs. In this regard, ECSA does have some concerns with suggestions made on the concept of a Common European Maritime Space, addressed elsewhere in the commentary.

Consistent with this approach, European shipping companies should continue to be able to employ residents of other Member States reflecting the cost of living, taxes etc. in that other Member State. It is moreover important that European seafarers from Member States with lower costs of living etc. are not deprived of their right to compete within the Community.

ECSA fully recognises the importance of maintaining and developing maritime know how at European level and fully supports the sufficient recruitment for key positions in a long term perspective, of nationals of EEA as trainee seafarers. Moreover, ECSA acknowledges that the envisaged shortage of officers in some countries risks undermining the continued existence of such maritime know-how in Europe. In commenting on the current and future initiatives, ECSA would wish to stress the underlying importance of taking account of the diversity of circumstances that exist within Europe and of ensuring that there is sufficient flexibility to enable appropriate action to be taken nationally.

This latter point is relevant in relation to the supply of EU seafarers. A number of studies over the years have concluded that there is current or forecast shortage of EU junior officers. However, as indicated in the December 2005 Council Conclusions, more comprehensive information on supply and demand for EU seafarers in different Member States is needed. It should also be borne in mind that EU seafarers are part of a global market in which European officers are much in demand due to their generally high standards of competence.

Against this background, ECSA believes that the industry does offer attractive employment opportunities for European seafarers, notably officers. ECSA shares the statement of the ETF in the Green Paper that there is 'no evidence to substantiate that young EU nationals do not wish to seek a maritime career'.

However, it is accepted that in some but certainly not all EU countries the numbers of EU seafarers have declined. In this regard, the reduced European labour market due to underlying demographic trends raises, as for other industry sectors, particular challenges in attracting young persons into the seafaring profession. It is likely that these trends will be increasingly evident in the coming years; the unique nature of seafaring is also a factor that needs to be taken account of in seafarer recruitment. As with other parts of the maritime clusters, shipping needs to highlight to young people Europe's maritime heritage as well as the dynamic and forward looking characteristics of today's shipping industry.

Such challenges are being addressed, and a number of initiatives have and should be enhanced.

Maximising Application of State Aid Guidelines

ECSA regards the 2004 State Aid Guidelines (SAG) as the key instrument through which Member States can take action to keep their fleets competitive in the global market in which they operate. In the specific context of employment of national seafarers, the possibilities to reduce income tax and to alleviate social security costs are crucial elements. Moreover, additional possibilities for state aid exist in relation to training. ECSA is of the view that the terms of the SAG are such that they can be interpreted nationally with sufficient flexibility to contribute significantly to the employment of EU nationals.

ECSA would press national administrations to actively and flexibly exploit the Guidelines to the benefit of EU national seafarers. It is encouraging that in many Member States the application of SAG has already lead to the significant expansion of national fleets, resulting in documented economic and social benefits to national economies as well as companies and their employees ashore and on board.

It is noteworthy that, with the specific goal of promoting employment opportunities for EU seafarers, the new State Aid Guidelines included a stricter definition of 'Community seafarers' in relation to the beneficiaries of the SAG regarding scheduled regular intra EU passenger ferries (including ro-ro ferries).

EU/National Requirements and Action

Member States are of course best placed to identify the particular problems in relation to maritime employment being faced nationally and how those issues can be most suitably addressed in the local circumstances. There is no more relevant example than in relation to the assessment of the national supply and demand situation, and particularly to the action necessary to train the required number of seafarers for their national needs.

While there is a reference in the Green Paper to the poor image of the industry, we would stress that this is based on a wrong perception as well as not being applicable in all Member States. However, the industry certainly needs to improve the profile of shipping by appropriate campaigns that are tailored to meet the national circumstances. As became clear both from surveys carried out by both industry and under the UK Presidency in the second half of 2005, a considerable amount of work already is being carried out within Europe. However, greater exchanges of experience and best practice in this regard should be encouraged.

Maritime know-how is essential both for the industry itself and for the maintenance of the maritime clusters that are vital to the economic and social interests of the Community. It is also fully accepted that, to a lesser or greater degree within Europe, the possibilities of shore-side employment for former seafarers can be an important factor in attracting persons into a seafaring career, while noting that shipping itself needs officers to serve on board for sufficient time to ensure sustainability of the industry.

In this context, the ECSA/ETF Career Mapping project should be helpful in demonstrating the possible career planning opportunities for European seafarers in order to make shipping an attractive career option. At the same time, it must be recognised that the concept and circumstances of maritime clusters vary considerably within Europe and that one should be wary of any 'one size fits all' approach. ECSA would welcome discussions with ETF both on how to build on the project and to constructively address any shortcomings of the initiative.

Initiatives are being taken in many Member States to ensure that their maritime training courses are structured so as to prepare seafarers for long term maritime careers in the maritime cluster in addition to seagoing employment; as in many industries, shipping needs highly qualified people. How this is achieved will vary according to the nature of the national higher education systems.

In relation to promoting equality of opportunity and diversity in European shipping, the recent ECSA/ETF Guidelines to shipping companies with accompanying training package on eliminating workplace harassment and bullying should be widely applied nationally. Progress in this regard should be monitored.

Finally, in this section of the Green Paper, ECSA would wish to draw attention to the unhelpful reference on page 20 to 'flags of convenience'. This is a pejorative term promoted by the International Transport Workers' Federation (ITF) which it applies to many quality registers, as a part of its 50 year long industrial relations campaign. The use of the term is not recognised by IMO or ILO and, contrary to what the Green Paper implies, is not relevant to the enforcement of safety regulations.

Q- How can better working conditions, wages and safety be combined with sectoral competitiveness?

The 2006 Maritime Labour Convention, negotiated on a tripartite basis between the industry's social partners and Governments, provides a solid, comprehensive and global basis for worldwide employment standards. The prime goal is for global ratification of the MLC. Likewise, in the EU context, we hope that all Member States will ratify as soon as possible, with the Convention being fully implemented throughout the EU. Furthermore, ECSA is currently negotiating with its social partners to have EU legislation transposing the MLC (and Resolutions) via a Social Partners Agreement. In this regard, it is vital that such a process does not delay ratification by Member States and that there are no additional substantive elements introduced.

In relation to wages, the Green Paper incorrectly assumes that wages and conditions are currently inadequate or linked with the shortage (applicable in some EU countries) of EU seafarers. Wages, which evidence would suggest are at a high level, are inevitably determined by supply and demand in what is a global market. The ability of European seafarers to achieve high wages compared to other nationalities will depend on providing added value. In this regard, they will need to achieve the required high level of technical knowledge and competence to progress to senior management levels on board, and ultimately to shore based employment either with the company or within the wider maritime cluster.

While there is continuing demand for European senior officers amongst global ship operators, the cost of training junior officers as the senior officers of the future is initially very expensive in comparison with third country nationals with equal qualifications and competence. In this regard, and against the background of the requirements of shore based employers, ship operators should not be expected to bear the full burden of training. The emphasis on shore based opportunities provides a strong argument for 100% public funding of maritime training. The proposal in the Green Paper, that the expenses for on board training could be shared between Governments and the whole maritime cluster merits consideration.

Moreover, ECSA would reiterate its support given to the Commission's recommendation in its 2001 Communication on Training and Recruitment that Member States make better use of the European Social and Structural Funds. Joint action by the social partners to try to ensure that this is realised would be useful.

Q- How can the quality of education, training and certification be assured?

It is important that the training and certification of EU seafarers continues to be compatible and conducted in accordance with the IMO STCW Convention, as reflected in the EU Training Directive.

Shipowners are committed to high international standards of professional training for national seafarers and consider that the current level of training standards within Europe is of a high quality, which should be maintained. In this regard, in some countries a route is pursued via the promotion of academically highly qualified officers for increasingly technically sophisticated vessels and a career path involving the maritime cluster. Others deem a vocational approach as more appropriate. What is vital is to take full account of the diversity of circumstances that exist in Europe in relation to maritime employment and to respect the subsidiarity principle.

The IMO is soon to undertake a review of the STCW Convention, in which the industry and maritime administrations will play an active role. In this regard, the industry will be seeking to ensure that any changes both encourage innovation and provide some flexibility to enable shipowners to reach or exceed the required standards in the most efficient way possible to suit their particular ship operation via a functional approach as appropriate nationally.

2.6. Clustering

Q- What role can maritime clusters play in increasing competitiveness, in particular for SMEs, in improving the attractiveness of maritime jobs, and promoting a sense of maritime identity? How can the EU promote synergies between interrelated sectors?

It should not be overlooked that Europe has the biggest maritime clusters in the world and that shipping is the catalyst of the clusters.

The value of the clusters should be enhanced and their efficiency improved. As mentioned above it should be recognised in this context that maritime employment ashore far exceeds that on board ship and that ensuring shipping companies and the wider maritime cluster can prosper is consequently particularly important in this

context. Each industry of the cluster should have the highest efficiency and quality. Free market principles and the Lisbon Strategy should be applied in full.

As mentioned above, education and training could be improved in some Member States allowing having people with the highest qualifications in the maritime cluster. The career mapping exercise developed by ECSA/ETF will be helpful in career planning throughout the whole maritime cluster.

To attract young people to a maritime career the image of shipping in many Member States should be improved. The press and particularly the TV news have in some but not all Member States given the public a wrong perception of shipping by putting the accent on accidents and pollution. There is a need to raise awareness and improve the profile of the industry by national campaigns tailored to meet the national or local circumstances.

The indispensable role of shipping services for trade and the wealth of the people and the modern and innovative character of the industry is often forgotten and/or not known at all. Its efficiency and its mere existence are taken for granted. Shipping is certainly not a sunset industry but a modern industry that is there to stay and constantly expand. European shipowners are amongst the most efficient in the world controlling 41 % of the global fleet.

2.7. The Regulatory Framework

Q- How could the regulatory framework for the maritime economy be improved to avoid unintended and contradictory impacts on maritime goals?

A forward looking transport policy based on free trade and the Lisbon Strategy is the key for improving the maritime economy. All industries in the maritime cluster should continuously aim to become more efficient and to adapt to changing circumstances. This is particularly so for ports and other nodal points in the logistic chain. Ports should be allowed and encouraged to expand. Hinterland connections should improve. Port services should be modernized and liberalized. It would be impossible to explain that one sector – in this case port services – should not be subject to the Lisbon Policy or even worse to the basic rules of the European Treaty itself.

The basic principles of free trade as already contained in the Treaty and the Lisbon Policy should be at the basis for a regulatory framework if there is added value to have regulation.

As mentioned repeatedly in replying to the questions brought forward in the Green Paper the regulatory framework for shipping, being a global industry, should be based on international law and regulations. This should be taken into account on all fronts.

UNCLOS

As regards UNCLOS and in particular the UNCLOS regime for Exclusive Economic Zones (EEZs) and international straits, ECSA refers to the submission made by ICS and ISF on this matter.

ECSA is of the opinion that UNCLOS provides a balanced global approach, including on EEZ and international straits, which should be preserved. Any modification to this balanced system at regional (e.g. European) level will undoubtedly have a wider international impact the consequences of which cannot be predicted.

ECSA is concerned about the Commission's comment that the UNCLOS regime for EEZs and international straits makes it hard to exercise jurisdiction over transiting ships. Such comment might give the impression that the Commission has the intention to modify the relevant provisions of UNCLOS relating to exercising jurisdiction over transiting ships. Equally, any attempt to alter the status of international straits alarms ECSA.

As ICS and ISF, ECSA believes that the Commission might wish to think carefully about such statements since they might be used by other coastal states around the world as granting them an entitlement to interfere with freedom of navigation within the EEZ as well. This attitude could potentially have serious consequences for the security of maritime trade in general and in some of the world's major (geo-political) strategic waterways in particular.

ECSA wishes to underline that UNCLOS permits coastal states to protect their marine environments through the development, under the auspices of IMO, of measures such as vessel traffic monitoring, reporting requirements to coastal states and designation of 'areas to be avoided'.

On the other hand, ECSA notes with interest the suggestion that more cases might be referred to the International Tribunal of the Law of the Sea by a reference to this mechanism in agreements with third countries. A greater use of this UN institution could be supported, particularly when the compatibility of actions by flag states or coastal states with UNCLOS is in dispute.

Q- Which exclusions of the maritime sector from some EU social legislation are still justified? Should further specific legal instruments on employment conditions in the maritime sector be encouraged?

As one of the most globalised industries in the world and the backbone of world and European trade, the shipping industry needs global rules. Only by having international rules, rigorously enforced, can European shipping operate fairly and efficiently on the intensely competitive world market. The global nature of shipping has been consistently accepted and recognized by the EU Institutions both as a matter of policy and in the context of the many EU Regulations and Directives on social as well safety issues adopted over the last decade or more. The vast majority are closely based on ILO and IMO Conventions and this philosophy should be maintained.

This accepted approach has been reflected in shipping being excluded from some EU social legislation. EU social legislation has been primarily designed for land based industry rather than for the particular nature of the shipping sector. A prime example was the EU Working Time Directive, which if applied to shipping would have been totally impracticable. In the latter regard, a specific global instrument tailored to meet the particular needs of the maritime sector was developed on a tripartite basis and subsequently transposed into EU law via a Sectoral Agreement.

Q- How can EU safety regulation be simplified while maintaining high level standards?

While there may well be cases where consolidation of EU legislation would be helpful to aid understanding (an example is the latest Port State Control (PSC) directive), the essential point for the shipping sector, as mentioned above, is that EU safety regulation reflects requirements agreed internationally, primarily in IMO. The prime role for the EU is to ensure that international regulations are enforced properly and rigorously against ships of whatever flag. In the latter regard, the EU, notably EMSA, can and should play a useful role in bringing together Member States to ensure exchange of best practice and to ensure a consistent approach to enforcement throughout the EU. Again, PSC is a prime example in this regard. The optimal approach is to rigorously apply internationally agreed standards in Europe and as far as possible avoid national or regional rules.

Q- To what extent can economic incentives, self-regulation and corporate social responsibility complement government regulation?

In the context of self-regulation and CSR, it is important to allow market forces to work in favour of quality shipping. An important condition for market operators to be able to perform according to CSR-standards is availability and transparency of quality information. The Equasis database is a good example in this respect. Transparency in terms of "naming and shaming" of charterers and cargo-owners making use of sub-standard ships is also important.

In this respect, governments should introduce incentives such as less and simplified port state control for quality shipping companies. The ongoing revision of the EU Port State Control directive focussing on better targeting is very positive.

ECSA believes that one of the most important Corporate Social Responsibility actions of an industry is to make initiatives as and when new regulation is required. A recent example of this is the environmental standards and working conditions at ship recycling facilities in developing countries. In 2001 the International Chamber of Shipping published a voluntary "Industry Code of Practice on Ship Recycling" for shipowners, while at the same time advocating international regulation. We are pleased to note that the follow-up process in IMO and ILO to develop a globally binding convention has gained very wide support.

Collective bargaining agreements are a key self-regulation between the social partners. This should not be distorted through government intervention. On the other hand the relevant legislations of the Flag States should be respected. Protectionist measures undermining these principles and/or actions by parties and/or individuals in conflict with the Treaty are not acceptable.

Q- What further EU action is needed deal with to the inadequacies of sub-standard flags and to provide incentives to register under European flags?

The question makes the erroneous assumption that European Flags are the only quality Flags. Whilst European shipping represents quality operators, this does not mean that non-EU flags and open registers are substandard. Substandard shipping is shipping not respecting the international rules.

As evidenced i.a. from the Paris MOU Black list there are some flag states which, from lack of will or ability, are lax in the application or control of international rules. However, the term 'flags of convenience' as referred to in the Green Paper should not be used in this context. This is a pejorative term promoted by the International Transport Workers' Federation (ITF) which it applies to many quality registers, as a part of its 50 year long industrial relations campaign. The use of the term is not recognised by IMO or ILO and, contrary to what the Green Paper implies, is not relevant to the enforcement of safety regulations.

The most effective approach to deal with the inadequacies of flag states both within and outside of EU is to support measures through IMO. ECSA endorses measures aimed at encouraging Member States to volunteer to participate in the IMO Audit Scheme.

The proposals on Port State Control as contained in the Maritime Safety Package III will contribute to targeting substandard shipping and rewarding quality shipping with fewer controls.

Q- Should an optional EU register be made available? What conditions and incentives could be contemplated for such a register?

The attempt to rekindle the old discussion on a European register is not helpful. A European register would improve neither the quality of European shipping nor the competitiveness of European shipping companies. Already, EU ship registers are of high quality and are continuously improving. Moreover, a European register implies harmonising taxation and social security systems, the competency for which remains with individual Member States. Member States will resist the interference with their competencies as the EUROS discussion in the 1980s demonstrates. Reopening this discussion, which largely seems to be driven by a desire to create European symbols, ties up resources that could be better spent on other aspects of maritime policy.

ECSA believes that the State Aid Guidelines are a much better tool to strengthen European-owned fleets. As mentioned in one of the annexes to the Green Paper notes (SEC(2006) 689), the "Community State Aids Guidelines have been instrumental in reversing the trend, encouraging a re-flagging of the EU merchant fleet". Adopted in 1997, they allow Member States to take the necessary measures on taxation and employment costs to improve the competitive position of their maritime industry versus global competition. The system is flexible permitting Member States to respond to their specific situation.

This system has worked well and the Guidelines were extended in 2004 for a period of seven years. The EU should maintain the present Guidelines as long as possible and their application should be flexible.

Suggestions have been made to use a European Register as a symbol of quality rewarded by less controls. The idea of rewarding quality shipping through fewer controls is fully in line with suggestions made by the industry for a long time and is in fact already included in the proposal of a recast Directive on Port State Control currently under discussion in the Parliament and the Council. However, this should be valid for all quality registers and ships and not only for ships under EU flags.

3. MAXIMISING QUALITY OF LIFE IN COASTAL REGIONS

3.3. Developing Coastal Tourism

Q- How can innovation in services and products related to coastal tourism be effectively supported? What specific measures promoting the sustainable tourism development of coastal regions and islands should be taken at EU level?

In 2005, more than 364 million passengers were transported by ferry in the Baltic, Mediterranean and North Sea according to a recent survey by The Institute of Shipping Analysis. The sector is economically significant in its own right and a major direct source of employment on board and for personnel in the 300 plus operators working on the European ferry and ro-ro markets; there is also significant additional indirect employment flowing from the sector. The European ferry industry makes a significant and environment friendly contribution to intra European tourism, having a particularly important role in relation to island communities and to Europe's peripheral regions.

The European cruise industry carried some 3.3 million European passengers in 2005 and is a dynamic source of economic activity providing economic benefits to virtually all industries and countries throughout Europe. Europe is the centre of and world leader in cruise ship construction and refurbishment. As will be demonstrated in the soon to be published comprehensive study by the European Cruise Council, the cruise industry is a significant economic sector and a major direct and indirect source of employment. Moreover, and importantly, cruise lines view Europe as the market that offers the greatest potential for growth.

Against this background, ECSA would urge that the EU pursues policies which will stimulate the growth of the two sectors in the area of port efficiency, addressed elsewhere in the commentary, and taxation. In the latter regard it is hoped that the current VAT arrangements are effectively maintained and that parity between the airlines and shipping in relation to changes to travellers' allowances is established. On the environmental side, as mentioned above, the industry is committed to improving its environmental performance where there is a quantifiable benefit backed up through impact assessments. In doing so, the sector believes that international solutions offer the most sustainable long term way forward.

Moreover, ECSA believes that that shipping companies must place the principles of sound environmental management at the heart of their agendas when they formulate their business plans. In particular, they should devise clear policies to manage waste and conserve energy, as well as train staff to adopt an ethos of environmental responsibility and to deliver the quality of service and facilities that will equate to sustainability.

3.4. Managing the Land/Sea Interface

Q- How can the EU best ensure the continued sustainable development of ports?

Ports are essential nodal points in international transport chains. They must handle the bulk of international trade, which will continue to grow at fast rates. Ports, which serve an environment-friendly and low-cost mode of transport, are thus of highest significance for Europe, in terms of foreign trade and in terms of employment they generate.

As the International Chamber of Commerce, for example, notes, in many ports in Europe, containers and other shipments are piling high because of transportation bottlenecks. This means costly delays, missed berthing slots in subsequent ports, higher fuel costs to make up schedules, readjusted schedules, missed ports, missed feeder and train connections, changed documents and penalties. Access roads and intermodal connections are insufficient to ensure the swift and efficient transportation of containers that have been unloaded in terminals. Inland waterway barges and feeder ships compete with ocean vessels for berths. Access roads of ports and highways are congested, as are the railways. Problems in one region affect the performance of ports, waypoints and carriers in all modes along the entire supply chain, all incurring and causing additional costs. Delays have serious effects on just-in-time distribution systems, which seek to reduce inventory and distribution costs, and on lean production techniques, which seek to cut down on sources of waste in manufacturing. Delays result in huge costs for importers and a serious lack of predictability and reliability in supply chains.

The European Community should ensure that the principles of the Treaty are applied to the port sector. Along with legislators at other levels, the EU should act to implement commercially oriented frameworks offering genuine competition between and within port areas to create highest possible efficiency. In addition, EU Member States, regional and local governments should act to ensure that the necessary planning, investment tools and funding sources are in place to allow owners and operators to make timely and informed decisions for the future freight transportation infrastructure. What expansion areas are available for ports? What inland waterways will be dredged? Which highways and railways will be built? What funds will be made available? To ensure that EU ports can remain competitive, public authorities in Member States should develop and implement the necessary planning and investment tools for the expansion of port and freight transportation infrastructure. In addition, they should ensure adequate funding for required infrastructure developments. Urgent action is required to cope with the surge of trade that is anticipated in the coming years.

Q- What role can be played by regional centres of maritime excellence?

An Integrated Coastal Zone Management should take due account of all factors involved. It should look for the right balance between these factors and their importance for the European economy and the daily lives of people.

Shipping and ports have an indispensable role. This does not mean that other factors have to be ignored.

As far as the expansion of ports and hinterland connections are concerned the necessity of expansion and development should be clearly accepted. Environmental considerations that are relevant should of course be taken into account. However, they should be dealt with in a reasonable way and the procedures leading to decisions should not take an unreasonable long time, as has been the case up to now.

Regional centres of maritime excellence should be based on the maritime clusters. Their interrelation and cooperation will enhance economic activity, employment and result in benefits to society in the maritime regions.

4. PROVIDING THE TOOLS TO MANAGE OUR RELATIONS WITH THE OCEANS

4.1. Data at the Service of Multiple Activities

Q- On what lines should a European Atlas of the Seas be developed?

The ideas on a horizontal EU policy of the European Sea Area are interesting. However, they are complex and will need further investigation and discussion particularly between Member States.

Q- How can a European Marine Observation and Data Network be set up, maintained and financed on a sustainable basis?

In relation to the data set, see the comments below.

Q- Should a comprehensive network of existing and future vessel tracking systems be developed for the coastal waters of the EU? What data sources should it use, how would these be integrated, and to whom would it deliver services?

As observed on page 33 of the Green Paper, IMO is in the process of establishing a global tracking mechanism known as Long Range Identification and Tracking (LRIT). On behalf of shipowners, ICS (International Chamber of Shipping) has been leading industry representation in the IMO discussions. Following the adoption in May 2006 of the new SOLAS Regulation V/19-1 "Long Range Identification and Tracking of Ships" the IMO Maritime Safety Committee decided to appoint IMSO as LRIT co-ordinator. The onus now is on governments to set up national or regional databases and exchanges to permit the flow of tracking data from ships to authorised governments who will have paid to receive the data.

ECSA encourages EU Member States to co-operate to establish a regional tracking centre (or centres) and to make full use of the tracking data that will be provided for security, safety and environmental purposes. In this context, ECSA supports the mandatory use of the SafeSeaNet project for an electronic system of information exchange on movements of ships and dangerous cargoes in EU waters, as proposed in the Third Maritime package. It is important to ensure, however, that it does not result in increased administrative or cost burdens for the industry and that there is harmonisation with international rules. Moreover, in relation to the cargo and position

of ships, full account must be taken of the need to ensure confidentiality vis a vis any possible commercial implications.

IMO has already mandated the carriage of Automatic Identification Systems (AIS) Class A in ships engaged in international trade and this system is the perfect complement to the LRIT system. LRIT provides identification and tracking of ships on a global basis. When ships are operating closer to the shore, AIS provides a wealth of data that will be a suitable supplement to government departments. The industry can identify no need for any additional tracking equipment in ships.

It is very important that governments recognise the value of the tracking data in strategic and commercial terms. IMO has made strict rules on the uses to which LRIT data may be put and, importantly, on the permissible users of the data. Tracking data on ships should be afforded protection in accordance with its strategic worth.

We also refer the Commission to the ICS/ECSA comments which are available upon request on the Proposal for a Directive amending 2002/59 establishing a Community Vessel Traffic Monitoring and Information Traffic System, including our comments about the proposed requirement for AIS on fishing vessels.

4.2. Spatial Planning for a Growing Maritime Economy

Q- What are the principles and mechanisms that should underpin maritime spatial planning systems?

Properly implemented, Marine Spatial Planning (MSP) will be the principal tool by which the EU member states deliver their economic and environmental objectives in a modernised, rational and more effective way. In order to provide this, however, the principles underpinning such a planning system should recognise that:

- MSP will only be effective if it is based on sound, objective and scientific data
- if all sectors and players within the marine environment are dealt with consistently and fairly
- if it embraces all elements of the principle of sustainability

Conflict arising from demands for marine space should be resolved through a framework which reflects the above bullets and which also recognises the need for decision makers to be uncompromising in the protection of the genuine and legitimate commercial uses of the sea which result from and respond to the demands of our society. To this end, our firm position is that commercial shipping must be given higher prominence within the concept of MSP and consideration should be given to the notion of shipping clearways.

In terms of the mechanisms for delivering MSP, the responsible organisations will need to be robust, politically independent, open, transparent and adequately resourced with personnel of sufficient expertise in order to develop MSPs that are fit for purpose and capable of effective implementation. It is imperative that MSP be applied across EU waters in a consistent and harmonious manner and that they be fully cognisant of the rights of innocent passage and the provisions of UNCLOS.

Q- How can systems for planning on land and sea be made compatible?

4.3. Making the Most of Financial Support for Coastal Regions

Q- How can EU financial instruments best contribute to the achievement of maritime policy goals? Is there a need for better data on coastal regions and on maritime activities? How should maritime policy be reflected in the discussions relating to the next EU Financial Framework?

Experience has proven that there is today a mixture of possibilities for financial support. Eventually one does not see the trees any more in the wood or the other way around. It would therefore be helpful to create transparency particularly to avoid overlapping, undue financing and financing leading to distortion of competition. Financing should go to projects that give benefits to all and not to a few. A priority should be to optimize and develop infrastructure and hinterland connections.

5. MARITIME GOVERNANCE

5.1. Policy Making within the EU

Q- How can an integrated approach to maritime affairs be implemented in the EU? What principles should underlie it?

The implementation of an integrated approach for maritime affairs requires above all the political will of those concerned. Care must be taken not to create structures that create more layers of decision-making and bureaucracy without contributing to resolving the conflicts of interest that arise naturally and normally from the different perspectives that stakeholders have. The resolution of such conflicts requires foremost political will and political feasibility.

The principles that should underlie an integrated approach to maritime affairs have been mentioned in the ECSA replies to the different questions notably:

- The indispensability of maritime transport and port services for the European economy and the daily life of European citizens.
- The Lisbon Strategy should also be a main theme of a Maritime Policy.
- Shipping services are a de facto global business. This should be taken into account on all fronts.
- EU policy should strengthen international governance. It should be based on the primacy of international law and international organizations.
- The principle of subsidiarity should be applied.
- Before introducing new rules and regulations, existing rules and regulations should be fully implemented.

Q- Should an annual conference on best practice in maritime governance be held?

An annual conference could be helpful. However, it should not duplicate with other initiatives. Possibly it could coincide with the Maritime Day suggested by some

MEPs. This could be planned on the day of the World Maritime Day organized by the IMO.

5.2. The Offshore Activities of Governments

Q- How can the EU help to stimulate greater coherence, cost efficiency and coordination between the activities of government on EU coastal waters? Should an EU coastguard service be set up? What might be its aim and functions?

While an issue primarily for Member States, ECSA doubts the added value and practicality of creating an EU Coastguard. There are currently varying arrangements in place at national level and the priority for shipowners is that they are efficient and properly perform their functions. While arrangements to ensure that they cooperate closely where necessary already exist, there are no doubt possibilities where this can be enhanced and this should be looked at on an ongoing basis. EMSA can play an important role in regard to ensuring cooperation and the exchange of best practice. This should be the priority rather than create an EU Coastguard which, given the variety of existing structures and the current sovereign role of Member States, does not seem either a practical or political possibility in the foreseeable future.

Q- For what other activities should a “Common European Maritime Space” be developed?

It is unclear what the European Commission means by or intends with the concept of a Common European Maritime Space. Different Commission papers such as the White Paper on a Future Transport Policy, the Paper on Logistics, and in the Green Paper on a Future Maritime Policy refer to a Common European Maritime Space. However, none of these papers clearly defines the concept or states its purpose. Statements by officials of the Commission in which reference was made to regional measures on safety, environment, Euro Cabotage, employment conditions on ships, etc, have further increased the confusion.

However, it is evident that considering the EU as one country conjures the spectre of regionalism and protectionism. Regionalism and protectionism would seriously jeopardise the competitiveness of European maritime industries, which are operating in an international environment:

- This example could result in similar measures by third countries or groups of third countries. In this respect, it should be recalled that EU shipowners control 41 % of the global fleet and that many European operators do mainly business outside the EU in cross trades.
- The global system on safety and environment to which ECSA has referred to repeatedly in its previous submission on the Green Paper will be undermined by regional measures which by their nature work to the detriment of safety and the environment.
- Protectionist measures in the maritime labour market would have counter-productive effects of higher costs and job losses, possibly driving companies out of business.

- Transport that is artificially more expensive would hamper the promotion of short sea transport and the growth of European trade, and be in clear contrast with existing EU policies, including the Lisbon Policy.
- Expanding the scope on national cabotage to European cabotage will be seen as a hard-core protectionist measure on the international scene. It would seriously undermine the efforts for free market access in which the EU is involved in trade negotiations and WTO. Together with the Commission and Member States the shipping industry has for years tried to open the market for cabotage in other countries to the advantage of EU shipping, which reflects the role of EU being the leading service provider in the world in shipping. It would be a sad development when the EU spent many years to eliminate cabotage in the EU Member States and would then reintroduce cabotage rules in the EU. Furthermore, it should be remembered that some EU Member States have today completely free access for cabotage including for non-EU-ships.

ECSA hopes therefore that the industry has misunderstood what is meant by a Common European Maritime Space. ECSA strongly advocates that a Common European Maritime Space should focus on measures with added value to the EU such as the laudable suggestions of reducing administrative burdens for short sea shipping. This would perfectly fit in with the Lisbon Policy and the efforts towards better regulation.

In this context, one should note that the constructive work by DG TREN on short sea shipping has not yet given the expected results. The updated bottleneck exercise on short sea shipping is highlighting the outstanding issues. ECSA is fully prepared to take these issues once again up with DG TAXUD having the key to solutions.

5.3. International Rules for Global Activities

Q- How can the EU best bring its weight to bear in international maritime fora?

ECSA agrees with the Green Papers' clear message that shipping is best regulated on the basis of international rules.

The global character of the shipping industry has placed it in the "avant garde" in terms of global governance and regulation. Over the last 50 years the UN organisation International Maritime Organisation (IMO) has developed a comprehensive set of conventions and recommendations concerning safety, environment, liability and compensation and recently also security, applicable to shipping. These instruments are continuously updated.

In addition, the International Labour Organisation (ILO) has adopted a number of conventions and recommendations applicable to shipping. These have now been updated and consolidated in the new and comprehensive ILO Labour Standard Convention.

In many respects the shipping industry is a prime example of the potential for global governance. The global shipping industry, and consequently the entire European maritime industry cluster, requires and thrives from strong and efficient international bodies to develop and adopt binding global regulations. Unilateral regulation at national or regional level should be avoided.

ECSA believes that EU Member States and the EU have a very important role to play in contributing to building strong institutions for global governance. In this respect, we believe that it is important that maritime administrations of individual EEA and EU Member States take active part in the work of IMO and ILO. One should be cautious not to introduce procedures at Community level, which would weaken the input of individual European maritime administrations in organizations such as the IMO. Maintaining the expertise, technical resources and the quality in the individual Flag States is also an important contribution to the competitiveness of the national maritime industry clusters.

The 27 EU Member States already have considerable influence in the different international fora, fully utilising their traditional expertise within their maritime administrations in the regulatory discussions. ECSA supports the continued exercise of such influence and notes that the regular EU coordination meetings hosted by the Commission can assist in developing rules soundly based on technical and scientific arguments. It is also recognised that on some particular issues the growing technical expertise of EMSA can and should be used.

Q- Should the European Community become a member of more multilateral maritime organizations?

In 2002, the Commission issued a Recommendation to the Council to authorise the Commission to open and conduct negotiations with the IMO on the conditions and arrangements for accession by the EU. This remains the view of the Commission as expressed in the Green Paper.

Member States have indicated strong opposition to the approach and, for pragmatic reasons, ECSA shares this view. It is vital for the industry that the global maritime rules are effective, clear and based on knowledge and realities. In this respect, the shipping industry wants strong and efficient international bodies to create a global framework of appropriate global legislation. These international organisations such as IMO should make full use of the expertise provided by individual Member States. Procedures weakening the input of individual Member States, which would seem an inevitable consequence of EU membership of IMO and ILO, would gradually weaken the expertise, the technical resources and the quality in the individual EU Flag States. This should be avoided. Moreover, there would be danger that EU membership would have the perception of 'politicising' discussions on complex technical issues, with an increasing tendency for block voting culture to develop; if this were to materialise, the decision making process could be gradually paralysed, diluting the efficiency of the organisation.

Q- How can EU external policy be used to promote a level playing field for the global maritime economy and the adoption of sustainable maritime policies and practices by third countries?

Fundamentally, a EU external policy should be built on the primacy of international law and international institutions. Through its economic and political might, the EU has a special role to play in developing international law and international institutions. However, this role must not lead to regional, insular policies.

In view of the international character and the international activities of it an active and efficient external relations policy respecting the division of competencies is of key importance. Through its Member States and through its development policy, the EU should strive for a level playing field in areas such as environment, safety and security. The EU should take the lead in developing a level playing field. ECSA commends the Commission and Member States for the efforts demonstrated in this respect.

The liberalization of international markets and effective tools for dispute settlement should be primary goals of EU foreign trade policy. The WTO would be the best avenue to achieve these goals.

The EU-China maritime agreement of end 2002 has proved its continued success as confirmed during the implementation meetings. ECSA welcomed the first negotiations on a EU-India maritime agreement and hopes that progress towards an agreement can be made in the context of negotiation rounds.

This active policy on relations with third countries should be further enhanced. An EU development policy should contribute to developing maritime skills and modernizing maritime infrastructure in third states. This in effect could be a significant contribution to raising environmental standards.

Many other issues ranging from legislative to practical and operational constraints are dealt with ad hoc in close consultation with the Commission and Member States.

5.4. Taking Account of Geographical Realities

Q- What regional specificities need to be taken into account in EU maritime policies?

When dealing with regional specificities the international environment in which shipping operates should remain the basis. Harmonized application of international rules on a national and regional basis should be ensured. We are thinking particularly of rules on safety, security and environment. On a European basis, improvements should be made on harmonized application of EU customs rules and regulations.

At the same time, a rigorous application of the principle of subsidiarity, consistent with international rules will help ensure that EU maritime policies consider regional specificities within the territorial waters of Member States.

Q- How should maritime affairs be further integrated into the EU's neighbourhood and development policies?

The shipping industry would suggest enhancing the cooperation between the authorities in sensitive geographic areas e.g. in the Mediterranean. This is especially valid for issues such as immigration control and related issues.

More cooperation could also be established in enhancing the development of short sea shipping, improving the efficiency of ports and creating adequate hinterland connections.

An EU development policy should contribute to developing maritime governance and modernising maritime infrastructure in third states. This in effect could contribute significantly to raising environmental standards and encouraging economic growth.

6. RECLAIMING EUROPE'S MARITIME HERITAGE AND REAFFIRMING EUROPE'S MARITIME IDENTITY

Q- What action should the EU take to support maritime education and heritage and to foster a stronger sense of maritime identity?

In view of the lack of knowledge on the indispensable role of shipping for the EU and the wrong perceptions about the performance of shipping, efforts should be made to improve the profile of the shipping industry. As with other parts of the maritime clusters, shipping needs to highlight to young people Europe's maritime heritage as well as the dynamic and forward looking characteristics of today's shipping industry.

The industry supports the suggestions made by some MEPs to organise a European Maritime Day. This should take place jointly with the International Maritime Day as organised by IMO.

The maritime heritage should be protected and promoted with the public. In their Communication with the general public and in their discussions on maritime issues the European Institutions should constantly take into account and underline the essential role of shipping for European and global trade.

January 2007