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Executive Summary

ETF response to the Public consultation on the Mid-term review of the EU Maritime Transport Strategy

1. Background information

The European Commission launched at the beginning of 2015 a public consultation which aimed at collecting stakeholders' views on the priority areas for the EU and its Member States when defining future actions and initiatives in the framework of the EU maritime policy.

This public consultation is part of the wider Mid-term review of the EU Maritime Transport Strategy, which was launched following the adoption of the Athens Declaration at an Informal Maritime Ministerial Meeting organised by the Hellenic Presidency in Greece on May 2014, and its official endorsement by the Council shortly after. The Commission is expected to present proposals to amend the 2009 Maritime strategy, taking into account the outcome of this public consultation.

2. ETF response to the questionnaire

On top of the contributions from a number of affiliates, the ETF response is largely based on two position papers previously adopted by the ETF Maritime Transport Section:

- The ETF Position Paper on the Mid-term review of the EU Maritime transport Policy (Athens Declaration);
- The ETF MTS Manifesto on Quality Shipping.

3. Summary of the ETF response

a. General objectives of the mid-term review

The ETF stresses the need for the mid-term review to place more emphasis on the areas which could improve the working and living conditions as well as the safety of those working onboard ships and advocates the need to develop a progressive EU framework which ensures more and better jobs at sea for EU-domiciled seafarers.

The ETF acknowledges the importance of improving the environmental record of the EU shipping industry, but any measures in this domain should also be balanced with economic and social concerns. The ETF also supports the idea of improving the competitiveness of the EU shipping industry, but recalls that it should translate into jobs for EU seafarers and not be a way to further open maritime markets without restraint to the detriment of the employment of EU-domiciled seafarers and of the whole EU maritime cluster.



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b. European shipping in Globalised Markets

The ETF agrees that more should be done to promote a global level playing field in the maritime transport sector, but questions what the EU policy makers put behind the concept of global level playing field, i.e. further opening of the markets and sticking to international minimum standards (ILO/IMO). The ETF also denounces the use of trade agreements to undermine existing protective cabotage laws, such as the Jones Act in the US, which have proven to help maintain and improve the quality and competitiveness of the US maritime cluster.

In the ETF's point of view, the EU should develop a regulatory framework going beyond minimum standards and a more competitive EU shipping industry meaning more and better jobs for EU-domiciled seafarers, being ratings or officers, in short sea shipping as well as in deep sea.

Suggestions on possible actions / initiatives proposed by the ETF

- Ensure the widest possible ratification and thereafter the proper implementation of international instruments as a first step to raise the common playing field to acceptable levels and fight against social dumping practices;
- Revive the EU Manning Directive and adopt an appropriate legislative framework which would implement a level playing field in the intra community trade;
- Review of the State Aid Guidelines (SAG) for Maritime transport to ensure that Flag of Convenience ships would not benefit from it, but instead would result in job and training opportunities for EU nationals and allow the adaptation of the industry to the ever evolving challenges it faces.

c. Human Resources, seamanship and maritime know-how

The ETF identified a number of areas where more can be done for the improvement of the on-board living and working conditions: safer conditions of employment (appropriate health and safety measures, issue of fatigue), right to social security for any seafarer working on board an EU-flagged vessel, fair treatment of seafarers in the event of a maritime accident, simplification and digitalisation of administrative formalities...

As for the improvement of the attractiveness of the maritime careers, the ETF stresses the need for the industry to offer a positive outlook for would-be seafarers. The shipping industry must provide an appropriate number of training berths, more and better jobs for both ratings and officers and promote career mobility within the maritime cluster, although not to the detriment of maritime careers at sea. The development of quality training, education and certification standards of EU seafarers (beyond IMO STCW standards) is essential to ensure that they develop a competitive advantage in terms of skills and preserve the EU maritime know-how and ultimately strengthen the EU maritime cluster.

d. Quality shipping as a key competitive advantage

The ETF insists that the **quality of EU shipping** should be viewed in the light of the place devoted to the human element: the EU policy makers should focus their action on the improvement of working and living conditions (including safety) & on training and education. The ETF contribution warns that the



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increased use of third country nationals on board EU vessels will make it difficult to sustain and improve the quality of the EU maritime cluster.

In terms of **environmental performance** of the EU shipping industry, the ETF first stresses the need to ensure that all operators are subject to and respect the same international environmental standards. ETF also puts forward the need to make sure that any regulation adopted at EU level in this area would be based on the flag-blind principle so as to ensure a level playing field between operators in EU waters. The ETF indicates that, for example, the SAG scheme could be used to modernise the EU fleet and make it more environmental friendly. Besides, the appropriate training must be offered to active and future seafarers.

In respect to **maritime transport security**, the ETF raises a number of areas where the relevant international/EU/national policy makers should take urgent measures, such as the issue of criminalisation of seafarers, the issue of migrants at sea, piracy and the question of the entry, re-entry or transit of seafarers in the Schengen area.

e. Exploiting the full potential of short sea shipping

The ETF underlines that the promotion of intra-community shipping should contribute not only to facilitate business and shift long-distance transport from roads to ships but also to promote the recruitment and retention of a highly skilled European workforce, ratings and officers, to take up a career in the maritime industry.

To achieve that, the ETF stresses that the EU policy makers should ensure a level-playing field in intra community trade by adopting a revamped Directive on manning conditions for maritime services operating between Member States, based on the ITF Common Policy on European Ferry Services (so-called "Athens policy"), which would enforce acceptable social standards on board ships trading within the European Community and stop the downward spiral in salaries, working conditions and discriminatory practices on grounds of nationality and/or place of residence or flag of registration.

The full ETF answer to the Public consultation on the Mid-term review of the EU Maritime Transport Strategy can be requested by sending an email to r.gelmini@etf-europe.org



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