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ETF reaction to proposal for new Detailed Implementation Plan of the Motorways of the Sea

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1. General

The new Detailed Implementation Plan is based on a concept called a **sustainable, seamless and smart European Maritime Space**, to be understood not as a geographical concept but as an integration of the maritime pillar within the whole TEN-T. It wants to enhance links between ports and shipping and focus on the whole maritime cluster and its infrastructure needs.

The new MoS DIP is to be seen as part of the revision of the TEN-T Guidelines, which should be finalised by June 2020. The new plan takes the **European Green Deal as a starting point** and shall replace the old Section 4 of the TEN-T Guidelines.

ETF generally welcomes the changes proposed in the new DIP by the European Coordinator of the MoS. Many of the **shortcomings and weaknesses identified in the previous DIP are now being addressed** in the new plan. Issues such as problems with short-term project-based approaches and lack of attention to labour and environmental challenges haven't been partially included in the new proposal. In addition, the proposed assessment of the programme by identifying the 'degree of adequacy' and relevant gaps in relation to the objectives, are an improvement compared to the previous approach.

Nevertheless, the plan could be substantially improved if it were to

- include more attention to **training and skills needs**, and
- reinforce the part on "**European added value**" as a return on investment or conditionality.

A more elaborate recommendation can be found in point 2 Conclusions.

a. Smart European Maritime Space

The smart pillar of the new DIP focuses on interoperability and data-sharing between stakeholders, tools to enable more efficient customs operations and cargo clearance, and EU-wide maritime ICT services for traffic management.

ETF generally welcomes these proposals as long as it is being accompanied by the necessary training of workers involved, and as long as the implementation is aimed at decreasing the current administrative burden placed on involved staff.

In particular the implementation of the European Maritime Single Window environment, will be very important. This will need to be accompanied by the installation and offer of the appropriate



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programmes and applications (including necessary training) in order to facilitate smooth operations and less administrative burden. Better cooperation, task division and communication between ship and shore will also be crucial here.

If managed well, this action **could considerably improve the level playing field in terms of reporting formalities between land and sea**, which until now has been one of the major obstacles to the development of short sea shipping in Europe.

When it comes to digitalization and automation of shipping and port operations, ETF advocates a **human-centred approach**. This means that following elements need to be ensured: collective bargaining (workers need to be included in any changes to company policies and in case of redundancies alternative solutions need to be found), skills and training (any changes to job functions and competencies need to go hand in hand with adequate training offers), safety and high standards (in order to avoid accidents related to pilot projects). Reference can be made here to ongoing projects aimed at future-proofing the skills needs of maritime professionals and inland waterway crew.

b. Seamless European Maritime Space

The seamless pillar of the DIP is aimed at ensuring appropriate hinterland connections, removing connectivity bottlenecks, and supporting MoS links with peripheral regions and neighbouring countries.

ETF generally supports the attention to the development of port infrastructure and better integration of MoS within the whole TEN-T through both a regional approach and cooperation with the Core Network Corridors. This should indeed contribute to more coherency and better coordination of the different infrastructure needs.

The **development of port infrastructure** will be very important to ensure that port workers will not be confronted with a sudden increase in operations - due to new additional short sea shipping routes - without the necessary tools to manage them. This process should be properly **managed by appropriate procedures to hire additional labour and offer the necessary training** to port workers.

The suggested approach by the DIP to enhance cooperation between the different maritime stakeholders is supported by ETF and will ensure that infrastructure projects are tuned in to the actual existing needs. This will also contribute to overall sustainability of the MoS.

c. Sustainable European Maritime Space

The sustainability pillar of the new DIP focuses on decarbonization including new ship propulsion systems, alternative fuels, bunkering facilities, shore-side power supply, and climate adaptation.

ETF welcomes the attention given to environmental challenges which will be one of the major issues to be dealt with by the industry on both the immediate as long-term future. If managed well, **the development of a green EU-fleet and new shore-side services may create important opportunities in terms of employment**. An important aspect here, which is not included in the plan, will be the adequate provision of **training and education** to maritime professionals dealing with new green technologies and systems.

Another element of the DIP contributing to the sustainability pillar, is the proposal to enhance financing tools and ensuring a more **sustainable financing system** for future projects including



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a focus on those projects with the highest “European added value”. ETF welcomes this approach as it was identified as one of the major shortcomings in previous MoS programmes: if new short sea shipping routes and subsequent changes to port infrastructure are to be maintained over time and return on investment, then this needs to be supported by a more sustainable and long-term approach.

We take note that the document pays attention to “increased expectations for safety” - including the fact that more comprehensive EU legislation can only be ensured on EU-flagged vessels, and the importance of “human capital and jobs”. ETF does **deplore that the sustainability pillar as such does not contain any references to social/labour-related issues** such as training and skills, employment and jobs, or to the flags vessels involved in MoS routes, are flying.

We think it is important to state here that high safety standards can only be guaranteed by ensuring the application of EU legislation going beyond international minimum standards within the frame of the MoS. Moreover, safety is not only determined by specific requirements and training, but is also closely linked to fatigue and overall working conditions which are often determined by the flag.

ETF therefore welcomes the proposal made to **prioritise those projects with the “highest European added value”**. **A proper implementation of this approach based on the elements put forward above**, could be helpful to ensure that investments made with EU funds will pour back into the European economy.

2. Conclusion and recommendations

The new DIP for MoS is overall an improvement compared to previous plan. It could however be substantially improved if following aspects were to be reinforced:

- **Training and skills:** all operations emanating from the MoS will be handled by people working in the industry. **The quality and safety of these operations can therefore only be ensured if these people possess the right skills and competences.** Especially in the face of changing market developments, changing demographics and major challenges such as climate change and digitalization, skills and competencies will be crucial to develop a true sustainable, smart and seamless European Maritime Space.
- **Highest European added value:** Due to the lack of any conditionalities in terms of employment for European maritime professionals, we cannot assess if MoS has had any impact in terms of jobs. But if we go back to the evaluation of MoS projects in previous years, we cannot see any positive impact in terms of number of short sea shipping operations. **In the end, this is what the ETF expects from the MoS: that it sustainably boosts employment opportunities for European workers in the maritime sector, and in particular for European maritime professionals in short sea shipping. We therefore recommend that this part of the DIP would be developed more in detail, including references to due diligence and human rights.**



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