



EU Industrial Maritime Strategy: No Competitiveness Without Seafarers and Quality Jobs

In its first reaction, the European Transport Workers' Federation (ETF) welcomes the European Commission's effort to develop an EU Industrial Maritime Strategy, including the maritime transport sector and recognising its strategic importance for Europe's security, resilience, economy, and energy independence.

The Strategy contains several positive elements that reflect long-standing ETF demands, including recognition of the maritime workforce recruitment and retention crisis, the strategic value of EU flags and the objective of enhancing the attractiveness of EU Member State flags, the need to strengthen resilient EU industrial capacity through public procurement preferences for Made in EU vessels and equipment, the alignment of climate regulation, recognition that divergent social security schemes for seafarers create legal uncertainty and unequal protection, attention to shadow fleet practices, and the need to secure maritime infrastructure.

However, the Strategy must place workers at its core as Europe cannot secure supply chains, energy autonomy, fleet decarbonisation or secure maritime infrastructure without the people who operate the fleet. **The EU can do more for a socially sustainable shipping without social dumping and equal treatment for all maritime professionals working between EU ports – regardless of nationality or flag. Work in European waters must mean European conditions¹.**

ETF stands ready to engage constructively with the European Commission, industry stakeholders and social partners to ensure that the final Strategy delivers a **just, sustainable and socially responsible maritime future for Europe**.

BUILD, EQUIP & REPAIR – Strengthening the EU's maritime industrial base

As ETF, we support the Strategy's ambition to strengthen domestic manufacturing, modernise shipyards and encourage green and digital technologies. In particular, we welcome the public procurement preferences for **Made in EU** vessels and equipment, strengthening the domestic EU ship recycling capacity and measures targeting unfair competition and foreign subsidies.

However, we must insist that **all public support must be made conditional upon the social considerations** such as creation of jobs within the EU, quality jobs, social conditionalities, collective agreements, training opportunities, fair recruitment and transparent crewing.

¹ [ETF Concept Note on A European Maritime Space for Socially Sustainable Shipping](#)



TRANSPORT & CONNECT - Pursuing competitive, sustainable and quality shipping

The Strategy recognises global competitive pressures and distorted international markets, particularly in shipbuilding and shipping, however it must also address the social dimension of competitiveness. At the same time, we must insist that **quality jobs, fair wages and safe working conditions are prerequisites of competitiveness**, not an afterthought.

Ownership and flags

ETF further welcomes the Strategy's recognition of EU flags' strategic value and explicit objective to **enhance the attractiveness of EU Member State flags**. The EU must protect responsible shipowners, EU seafarers and EU flags from unfair competition and low-cost crewing models. We however **disagree that the state aid guidelines are endorsed "as a key tool" without any plan for their revision or stronger enforcement**. Inter alia, the Strategy must also address how national tonnage tax schemes often subsidise vessels that do not employ EU seafarers, sometimes even not flying the flag of an EU member state.

We therefore call for

- a framework where **all crew working on board ships operating regularly in European waters can enjoy the EU's terms and conditions**
- the creation of an **enabling environment for re-flagging EU-controlled tonnage** from flags of convenience and second registers back to **EU national first registers**;
- **a revision of the EU State Aid Guidelines for Maritime Transport**, making EU seafarers' employment, training and fair crewing mandatory conditions; encouraging the growth of EU national first registries, and with the effective implementation, stricter monitoring and enforcement of the obligations by the European Commission.
- proper international implementation of the United Nations Convention on the Law of the Sea (UNCLOS) Article 91, which mandates a "genuine link" between the vessel's ownership and its flag of registry

Energy Transition and Decarbonisation

In general, the **ETF is supportive of Europe's goal of maritime decarbonisation** and therefore, we would like to see a clear reference as regards aligning of EU climate rules (ETS + FuelEU Maritime) with any future IMO global framework, as well as simplification of the MRV reporting,

At the same time, we also believe that ETS revenues should not only incentivise low-emission technologies, but also channel resources for training, (as is the case in the proposed IMO Net-Zero Fund). Moreover, we **miss a reference and a clear commitment to achieving a just transition for maritime workers**.



Maritime Safety

ETF welcomes the Strategy's intention to address ageing passenger fleets, expanding safety requirements and addressing shadow fleet operations that often operate under opaque ownership, outside normal flag transparency and compliance practices .

However, maritime safety must be understood first and foremost as a human and labour issue. Safe ships require safe manning levels, well-trained and adequately rested crews, and strong enforcement of international and European safety, labour and environmental standards. The Strategy should therefore explicitly recognise that the erosion of working conditions, fatigue caused by excessive working hours, and minimum crewing practices driven by cost-cutting are direct threats to maritime safety.

Ensuring maritime safety also requires recognising and strengthening the role of seafarers as safety professionals. This includes guaranteeing their right to report safety concerns without fear of retaliation, ensuring adequate training, and providing decent working and living conditions on board all ships operating in European waters.

Administrative Simplification

ETF supports the full implementation of EMSWe and simplification of reporting requirements. However, simplification cannot mean deregulation. Workers' safety, rest and rights must not be eroded. Any efforts to streamline administrative procedures must fully preserve — and where necessary strengthen — safety, labour and social protection standards. In particular, simplification must not lead to reduced inspection frequency, weakened controls or lower enforcement standards, nor undermine the monitoring and enforcement of working and living conditions, including compliance with hours of work and rest, safe manning levels and labour rights.

ETF further stresses that effective enforcement requires adequate human resources and strong inspection capacities at both national and European level. Administrative simplification must go hand in hand with reinforced enforcement to ensure a level playing field and to guarantee decent working and safety conditions across the maritime sector.

Support for the inland navigation, cruise and boating industry sectors

ETF welcomes the commitment to the follow-up of the NAIADES III program for the European inland waterway transport and the explicit link to the maritime strategy. But we also need to highlight the entire absence of a social dimension in the previous NAIADES initiatives. All efforts were focussed on technical and technological dimensions and the workers were completely absent. This needs to be rectified in the future.

SECURE & PROTECT – Boasting naval, underwater and dual use capabilities



Within the current geopolitical context, ETF appreciates the Strategy's recognition of maritime transport as a strategic asset for defence, emergency preparedness, and military mobility. In particular, we welcome the recognition of threats from the surface to the seabed, measures on underwater domain awareness, focus on critical infrastructure and cybersecurity or the emphasis on dual-use capabilities.

The Strategy however completely omits the essential role of **EU seafarers** in resilience scenarios, neither it does address the risks of excessive reliance on third-country crew in emergencies, nor it does link flags of convenience to security vulnerabilities.

To address these shortcomings, the ETF proposes that:

- dual-use ferries built with the EU support programme **must be built in Europe**
- they must be **registered in the EU national first registries**
- they must operate with **EU/EEA seafarers**,
- requisitioning must never amount to forced labour

ACCESS TO SKILLS AND QUALITY JOBS

We **welcome the commitment to social matters** within the strategy, reflected in the decision to dedicate a specific chapter to these issues. At the same time, **we emphasise that social considerations are cross-cutting by nature and should be embedded throughout all chapters** of the strategy rather than treated as a standalone element. We are pleased to see that the Commission recognises that investing in people and their skills is essential, highlights cooperation with the IMO and ILO on safety training standards and working conditions, supports quality jobs and acknowledges the need for fair working conditions and safe workplaces. We also welcome the emphasis on the implementation and enforcement of EU labour legislation and the occupational health and safety acquis, as well as the recognition that divergent social security schemes for seafarers create legal uncertainty and lead to unequal levels of protection.

At the same time, the **Strategy still lacks a number of concrete measures needed to effectively address persistent social challenges** in the maritime sector. A stronger commitment is required to tackle divergent social security systems and to ensure proper enforcement and coordination among Member States with regard to social security and pension schemes. In addition, reskilling and upskilling linked to legislative or technological requirements should be clearly framed as a shared responsibility: such training must be free of charge for seafarers, financed by employers or public authorities, and carried out without encroaching on seafarers' free time. Finally, the Strategy should explicitly acknowledge and address the problem of excessive working time for seafarers under the current international legislative framework, which continues to pose risks to workers' wellbeing, safety and long-term attractiveness of the profession.

ETF also proposes that the **Commission take a clear leadership role by actively supporting a revision of the MLC and STCW frameworks** aimed at reducing excessive working time limits for seafarers. In this context, the Commission should engage proactively with ongoing international processes, including the ILO-IMO Joint Tripartite Working Group (JTWG) on seafarers' hours of work and hours of rest, which was agreed at the Special Tripartite Committee of the MLC in April 2025. Such engagement is essential to ensure that future regulatory developments effectively strengthen the protection of seafarers' health, safety and working conditions.



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