

# Mid Term Review of the EU Maritime Transport Strategy

Fields marked with \* are mandatory.

Please provide information to help us build your profile as a respondent. In accordance with [Regulation 45/2001](#), all personal data collected through this survey will be kept securely and will ultimately be destroyed.

\*Please note that the questionnaire will only use your full contribution if your name, organisation (if you answer on behalf of an organisation or institution) and contact details are provided. If you choose to not provide your name, organisation and contact details, you have the option of submitting a general comment only.

If you do choose to provide us with your name, organisation and contact details, you can still opt for your answers to remain anonymous when results are published.

- Yes, I will provide my name and contact details
- No, I prefer to provide a general comment only (and questionnaire ends here)

## A. Respondent details

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\*1. I speak on behalf of

- Myself
- An individual organisation
- An association representing other organisations

\*1.1. Can you please identify which organisation or association you represent?

Netherlands Ministry of Infrastructure

\*2. Please indicate if your organisation is registered in the [Transparency Register](#) of the European Commission.

- Yes
- No

\*3. First name

\*4. Last name

\*5. Address

\*6. City

\*7. Email address

\*8. Please indicate your country of origin.

\*9. Which of the following categories best describes your activity or that of your members?

- Public authority (Member State Representative, Ministry, Agency, other)
- Port authority, harbour master or port manager or other port service provider  
Other port service provider (terminal operator, stevedoring company, warehouse operator, barge terminal operator, rail terminal operator, passenger service operator, marine service provider, towage provider, mooring operator, ice-breaking, dredging, bunkering, and environmental service provider, or other service provider)
- Shipping company or shipping agency: ship-owning company, shipmanagement company, ship operator, etc.
- Shipmaster or other crew member
- Individual or Association with expertise on Maritime Transport
- Other (please specify)

\*10. What is the size of your organisation?

- Micro company (less than 10 employees, up to €2 million turnover, or balance sheet up to €2 million)
- Small company (less than 50 employees, up to €10 million turnover, or balance sheet up to €10 million)
- Medium size company (up to 249 employees, up to €50 million turnover, or balance sheet total up to €43 million)
- Large corporation (250 employees or more, more than €50 million turnover, and balance sheet total of more than €43 million)
- Organisation representing group of stakeholders
- Local Authority
- National Authority
- European Authority
- I don't know
- Other (Please specify)

11. Please, specify geographical area within which you operate?

*If you do not indicate any region, your answer shall be considered of general nature (you can tick several boxes)*

- Baltic Sea
- North Sea (incl. English Channel)
- Atlantic Ocean
- West Mediterranean
- East Mediterranean (including Adriatic) and Black Sea
- Other geographical area (please specify)

\*11.1. Please specify the other geographical area

NL flagged ships operate worldwide

\*12. Contributions received from this survey may be published on the European Commission's website, with the identity of the contributor. Do you agree to your contribution being published under your name?

- My contribution may be published under the name indicated
- My contribution may be published but should be kept anonymous
- I do not wish any of my contributions to be published

\*13. May the Commission contact you, in case further details on the submitted information in this questionnaire are required?

- Yes
- No

## B. Objectives - Envisaged Actions & Initiatives

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## B.1. In general

1. The mid-term review of the EU Maritime Transport Strategy should place more emphasis on

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree
Competitiveness of the EU shipping industry	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increasing the attractiveness and employability of the maritime professions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhancing ship safety and the protection of human life at sea	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improving the environmental performance of shipping	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhancing maritime transport security	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting alternative fuels for ships	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improving ports efficiency	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhancing the promotion of short sea shipping	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Offering equal growth opportunity to small and remote islands and insular states	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplifying administrative formalities for shipping and the maritime carriage of goods	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promotion of maritime research and innovation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Deployment and promotion of digital maritime services	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## B.2. European Shipping in Globalised Markets

\*1. Are there areas in which more should be done to further promote a global level playing field in the maritime transport sector?

- Yes
- No
- I don't know / No opinion

2. Please provide suggestions on possible actions or initiatives under these areas.

Develop guidelines for state aid to seaports with the aim of ensuring fair competition and a stable legal framework for port investment. Develop guidelines for state aid for maritime transport: adapt the state aid guidelines to the developments in the shipping industry, like for instance the growth of the offshore service vessels.

3. What challenges or obstacles (i.e. market access) maritime transport faces when trading with non-EU partners?

No urgent items other than issues under discussion in bilateral or multilateral fora.

\*4. Do you agree that EU and its Member states should intensify efforts towards free access to markets and further liberalisation of trade through bilateral maritime transport agreements?

- Yes  
 No  
 I don't know / No opinion

5. Are there any specific issues in relation to global shipping markets and bilateral maritime agreements that you wish to raise?

Outside the issues already raised in current negotiations with e.g. USA, China etc. there are no specific issues.

### B.3. Human Resources, Seamanship and Maritime Know-how

\*1. Do you think the existing rules regarding onboard living and working conditions in shipping as applied in the EU are effective?

- Yes  
 No (please specify)  
 I don't know / No opinion

2. What actions or initiatives should the EU and its Member States take to improve the attractiveness of maritime careers?

The introduction of the ILO Maritime Labour Convention 2006 (MLC) has positive effects in respect of the onboard living and working conditions. The rules as applied are effective. The MLC aims to improve the working conditions and terms of employment of the more than 1.2 million seafarers worldwide. The convention prevents unfair competition

in the maritime shipping industry. The MLC applies world-wide to all seagoing ships used for commercial activities. The Convention provides that every seafarer has the right to a safe and secure workplace that complies with safety standards, to fair terms of employment, to decent working and living conditions and to health protection, medical care, welfare measures and other forms of social protection.

Directive 2009/13/EC implements an agreement on the MLC between social partners. The Directive entered into force on the date of entry into force of the MLC. This is more effective because this contributes to create a global level playing field throughout the maritime industry, not only in the EU. The Convention, came into force on 20 August 2013 - effectively becoming binding in international law - and established minimum working and living standards for all seafarers on those ships. The MLC convention also contains important new compliance and enforcement components based on flag State inspection and for port State control (Directives 2013/38/EC and 2913/54/EU).

In the Netherlands several actions have been conducted to improve the attractiveness of maritime careers:

- Like the adaption of a maritime strategy (2015-2025). The Dutch government and the Dutch maritime cluster have joined forces for a shared ambition and strategy for which the stakeholders of the maritime cluster have provided the essential input.

- The strategy focuses on six overarching themes to support and strengthen the maritime interests of the Netherlands.

- One of the important themes is Human Capital. Also the promotion of international and European cooperation between maritime training institutions is one of the topics.

- The founding of Stichting Nederland Maritiem Land (NML). NML is an organisation that connects twelve maritime sectors. NML facilitates the Dutch maritime network. It is a market-driven initiative that was created in 1997 following a re-energized national shipping policy. Its core aim is to join-up the various maritime sectors and link them with government and academia. Doing this allows the creation of joint initiatives which strengthen individual sectors and promote the Netherlands as a significant maritime nation. Knowledge sharing across the network is facilitated to mutual advantage. NML is committed to promoting the expertise of the Dutch maritime sector on the international stage. Through these activities it is envisaged that Dutch maritime business will prosper, become more competitive and attract new talent. NML is committed to promoting the expertise of the Dutch maritime sector on the international stage. Through these activities it is envisaged that Dutch maritime business will prosper, become more competitive and attract new talent. At a national level, the organisation informs politicians and regulators to ensure the maritime sector remains in the public eye and continues to operate in the best possible climate for business. Enhancing the image of shipping and the attractiveness of careers at sea is also a very important topic.

- The introduction of the Maritime Labour Convention 2006 has also positive effects. Human capital is one of the key items.

• Ship owners should strive to offer short introductory stages for scholars to advance the choice for a maritime education.

At this stage there is no need for the EU to employ further actions on this topic other than to safeguard a global leveling playing field.

### 3. What actions or initiatives should the EU and its Member States take to improve the skills of seafarers in order to effectively meet the new challenges and technological developments in shipping?

See also reply to B.4.2: The added value of EU initiatives or maritime legislation, also on human element issues, is decreasing since the responsible international organization, the IMO, has developed legislative instruments on almost all fields related to maritime safety (as well as security and protection of the marine environment); instruments that are ratified and implemented by the vast majority of member States in the world. Port State Control Agreements all over the world guarantee an almost 100% coverage of IMO Instruments as a result of the principle that foreign ships visiting the port of a Party to such a PSC Agreement are obliged to adhere to the safety standards as prescribed in the IMO Conventions (based on the "no more favourable treatment" clause in those Conventions).

With regard to new challenges and technological developments the IMO clearly takes its responsibility in developing adequate measures/instruments at an early stage, of which we have seen examples e.g. with the development of the Polar Code and the IGF Code. In parallel with safety and environmental provisions in these instruments, the IMO has also developed human element provisions on these issues such as training requirements in the STCW Convention and Code.

The only action that the EU should undertake is to bring the corresponding directive (2008/106/EC) in line with these new developments.

### 4. What actions or initiatives should the EU and its Member States take in promoting the smart and better use of Information Communication Technologies (ICT) for improving quality of life at sea?

The promotion of unlimited access to internet on board would certainly add to the benefit for the attractiveness of the maritime profession for young people.

## B.4. Quality Shipping as a key competitive advantage

1. In which areas should the EU and its Member States do more to improve the quality of EU shipping / maritime cluster?

The European Commission could support the uniform interpretation of regulations and enforcement of regulation.

\*2. Do you think that the existing international and EU legislative framework on ship safety is adequate?

- Yes
- No (please specify)
- I don't know / No opinion

2.1. If not, please specify the area(s) where there is a need for further improvement.

In principle the current international legislative framework on ship safety is adequate. Of course there are elements that can and should be improved. In general however one could say that the legislative pressure on the maritime sector is rather big compared to that of other transport modes such as civil aviation. The goal for the coming decennia should rather be to diminish that legislative pressure while maintaining a similar level of safety. The added value of EU maritime legislation is decreasing since the responsible international organization, the IMO, has developed legislative instruments on almost all fields related to maritime safety (as well as security and protection of the marine environment); instruments that are ratified and implemented by the vast majority of member States in the world. Port State Control Agreements all over the world guarantee an almost 100% coverage of IMO Instruments as a result of the principle that foreign ships visiting the port of a Party to such a PSC Agreement are obliged to adhere to the safety standards as prescribed in the IMO Conventions (based on the "no more favourable treatment" clause in those Conventions).

Areas that could be improved - on an international level - are:

- damage stability of passenger ships and roro-vessels;
- reduction of administrative burdens related to legislation on ships safety;
- goal-based regulations instead of prescriptive regulations;
- reduction of EU regulations and directives on maritime safety since they put an extra and unnecessary burden on member States and reduce the effectiveness of EU member States in the IMO.

\*3. Are there areas in which the EU should do more to improve the environmental performance of shipping?

- Yes
- No
- I don't know / No opinion



4. Please provide suggestions on possible actions or initiatives in these areas.

Concerning climate policy / CO2 emissions the EU has to continue to pressure for global agreement that all transport sectors have to contribute. IMO has to be called upon to take further maritime CO2 reduction measures (EEDI and SEEMP are not enough to curb the growing CO2 emissions from the growing maritime industry).

It is important for the international maritime industry that global regulations apply; they are more effective and necessary to maintain the level playing field. From the EU side the EU Member States therefore necessarily have to be able to negotiate constructively in IMO. For instance on a global data collection system for maritime CO2 emissions. Agreement of a global data collection system would be an important step, that would allow IMO to prepare for further measures. Starting with setting the necessary reduction targets for the maritime sector.

Both for a global data collection system as well as the EU MRV regulation it is necessary to study the concept of operational energy efficiency to better understand the issues at stake and to be able to find ways to calculate the energy efficiency of ships or particular ship types in such a way that a robust and fair comparison between those ships or ship types becomes possible.

CO2: Improve the Annex to the EU MRV Regulation; more research is needed on the basis of ship data as to how the energy efficiency of different ship types can be calculated in a robust way so as to make a fair comparison possible. This work will allow for a solid and constructive input of the EU member states in IMO when discussing a global data collection system and the possibilities for further energy efficiency measures.

\*5. Do you see a strong trade-off between the environmental performance and the competitiveness of the EU maritime transport sector?

- Yes
- No
- I don't know / No opinion

6. Please provide suggestions on possible actions or initiatives for the promotion of sustainable EU shipping (i.e. meeting environmental challenges whilst maintaining the competitiveness of the sector).

CO2: Energy efficient shipping is not only necessary for climate purposes, but can give a competitive advantage to the European shipping industry.

- In principle the Netherlands adheres to global measures. These are more efficient and better for fair competition of Dutch stakeholders
- 
- There is a task for CO2 as described above
- IMO allows regional choices for emissions like SOx and NOx: the ECA areas. The EU could explore whether all EU coastal waters should be declared as SECA or NECA areas.
- The EU could play a contingent role in making arrangements about an effective and consistent enforcement regime of global IMO agreements and conventions in Europe. In the Netherlands there are sometimes concerns that in practice IMO agreements are inequally enforced within the European Union.

7. What actions or initiatives should the EU and its Member States take to promote alternative fuel solutions for ships?

Prioritize resources to feasible transition of fuels for a sustainable shipping future, particularly LNG. Develop (Short Sea) shipping LNG transition scenario's: identify obstacles for early adaptors, Total Cost of Ownership (TCO) modelling, develop LNG pricing scenario's, incremental steps in preventing methane slip.

8. What actions or initiatives should the EU and its Member States take to support maritime transport security?

The EU Maritime Security Strategy with its accompanying Action Plan consisting of 131 actions, as agreed by the Council, is the main initiative in this field that we would like to refer to, in order to prevent any policy overlaps.

\*9. Do you expect the EU and its Member States to take specific initiatives to prevent piracy and armed robbery at sea?

- Yes (please specify)
- No
- I don't know / No opinion

9.1. If so, please specify.

For example land side initiatives to prevent piracy and armed robbery at sea. Improvement of institutional and economic circumstances in specific countries might support prevention of piracy and armed robbery at sea.

\*10. Are there areas in which the EU should do more to improve the competitiveness of the EU shipping industry?

- Yes (please specify)  
 No  
 I don't know / No opinion

10.1. If so, please specify.

Subjects that influence the competitiveness of the EU shipping industry are:

- the possibility for national governments to provide state aid (to contribute to a level playing field),
- to provide opportunities for innovation (create regulations that do not hamper innovation, offer measures for financial support),
- sufficient supply of maritime personnel of good quality (improve possibilities to)
- adequate legislation (reduction of the administrative burden, uniform interpretation and enforcement of regulations, international regulations instead of regional EU regulations)
- In these areas the European Commission could provide an adequate environment for European shipping companies to operate.
- EU support for sustainable financing structures and CEF funding can improve the competitiveness and sustainability of the EU shipping sector

\*11. Are you aware of any successful initiatives at international, regional or national level which improves the quality and/or the sustainability and/or the competitiveness of the maritime transport sector?

- Yes (please specify)  
 No  
 I don't know / No opinion

11.1. If so, please specify.

With the Dutch maritime strategy 2015-2025 the Netherlands will be focusing the coming years on the following priorities regarding maritime transport: human capital, innovation, trade, logistics, infrastructure, accessibility, safety & environment and safety threats & stability. For the Netherlands these priorities are all interlinked and closely related to the six strategic areas defined for the EU maritime transport policy.

\*12. Are there any successful initiatives or innovative actions applied in your working environment which contributes to the quality and/or the sustainability of the maritime transport sector?

- Yes (please specify)
- No
- I don't know / No opinion

12.1. If so, please specify.

Within the Water Business program and the Logistics Business program the Netherlands is among others focusing on innovation which should result in clean, smart and safe shipping, social innovation and integration of the maritime cluster in the logistical chain.

## B.5. Exploiting the full potential of short-sea shipping and sea transport services for business and citizens in Europe

\*1. Are there areas in which the EU and its Member States should do more to promote short-sea shipping?

- Yes (please specify)
- No
- I don't know / No opinion

1.1. If so, please specify.

Administrative and customs barriers that give short sea a disadvantage against road transport should be lifted as soon as possible.

\*2. Do you consider that maritime connections and quality of the service for intra-EU passenger transport are adequate?

- Yes
- No (please specify)
- I don't know / No opinion

\*3. Do you think there is a room for further improvement in the existing port systems in order to efficiently accommodate the ever-increasing maritime transport of goods and passengers?

- Yes (please specify)
- No
- I don't know / No opinion

3.1. If so, please specify.

Coupling of Port Management and Intelligent Transport Systems (ITS) can further improve the logistical efficiency of freight transport over water and land.

## B.6. Europe should be the world leader in maritime research and innovation

\*1. Are there areas in which the EU and its Member States should do more to promote maritime research and innovation?

- Yes (please specify)  
 No  
 I don't know / No opinion

1.1. If so, please specify.

Research to ever increase the competitiveness, sustainability and safety of shipping and the protection of human life at sea should be an ongoing process.

\*2. Do you think more can be done at EU level to promote technological developments and advanced and/or innovative logistics concepts which maximise the efficiency of maritime transport?

- Yes (please specify)  
 No  
 I don't know / No opinion

2.1. If so, please specify.

The EU could support integrated IT platforms and applications that integrate both maritime information from the Maritime Single Window as the information needed for continental transport, that support quick and coordinated loading and unloading and environmental-friendly continental transport, so called synchromodal transport.

\*3. Are there areas in which the EU and its Member States should intensify efforts towards the deployment and promotion of e-maritime /digital maritime transport services?

- Yes (please specify)  
 No  
 I don't know / No opinion

3.1. If so, please specify.

See 2.1

\*4. Are you aware about any successful initiatives from the private sector or are there any innovative actions applied in your working environment which maximises the efficiency of maritime transport?

- Yes (please specify)  
 No  
 I don't know / No opinion

## B.7. Other

1. Please add any other relevant comment/suggestion/ issue you wish to mention.

Better Legislation and Regulatory Fitness should be a horizontal priority within the EU maritime transport strategy.  
Please find uploaded the Dutch maritime strategy 2015-2025.

2. Please upload any additional contribution (e.g. position papers).

- [0110e57b-d0c6-422c-aa8d-fd8f5f5420b8/de-nederlandse-maritieme-strategie-2015-2025.pdf](#)

## Useful links

About this consultation ([http://ec.europa.eu/transport/modes/maritime/consultations/2015-mts-review\\_en.htm](http://ec.europa.eu/transport/modes/maritime/consultations/2015-mts-review_en.htm))

## Contact

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