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By Email

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Dear Ismo

Mid-term review of the programme for the promotion of shortsea shipping (COM (2003) 155 final).

Following your letter dated 10 November we have reviewed the programme currently running to promote shortsea shipping and would like to put forward the following comments:

General

In general, we are keen to see that this programme is refocused on administrative elements – such as streamlining customs documentation – which is essential if the playing field between shortsea shipping and road/rail haulage is to be levelled. Shortsea shipping should not attract a more onerous administrative burden when compared with other modes.

In parallel to this, a greater emphasis should be placed on promotion to buyers of transport services. A coordinated and well funded programme of promotion should be employed to ensure that shippers are aware of the many technological and customers service advances made within the industry over the last few years together with a demonstration that shortsea shipping is a reliable, sustainable, environmentally friendly and cost effective method of moving freight.

Action Sheet 1 - IMO FAL. We strongly support the continuation of this initiative. If we are to encourage shippers to use the shortsea mode we feel it is very important to ensure that shortsea shipping attracts no greater administrative burden than other transport modes. In particular, we would like to see this initiative extended to include the inter-modal, cross border supply

chains. For example, cross-border supply chains involving a combination of shortsea and road/rail should require identical administration to a supply chain involving road/rail only. We recognise, however, that cargo from deep sea destinations (outside of the EU) might have to be treated differently.

Action Sheet 2 – Marco Polo. This is a useful programme which should be continued and we would like to see the budget increased to allow a greater number of initiatives to be progressed. The procedure employed to consider applications and award contracts should be streamlined to ensure current commercial opportunities are not lost.

Action Sheet 3 – Intermodal Loading Units. The standardisation of loading units appears to be happening (to a degree) independently of Brussels as driven by the market. Any action by Brussels should take this into account and must not ignore standards employed outside of the EU and units employed in deep sea trades.

Action Sheet 4 – Motorways of the Sea. Sea and Water commented on this initiative in our response to DGTREN in September 2004 and this response remains extant. We don't believe that significant effort should be focused here.

Action Sheet 5 – Environmental performance. This is to be encouraged and we should recognise that up-to-date technology employed in new vessels has resulted in cleaner ships.

Action Sheet 6 – Guide to customs. This is a useful guide. To avoid disadvantaging shortsea shipping we believe it is very important that customs procedures are identical irrespective of transport mode.

Action Sheet 7 – Bottlenecks. This is a useful initiative but needs to be streamlined to make the process more manageable and should concentrate on real actions.

Action Sheet 8 – Computerisation of customs procedures. On the whole, this has been a success and is working well. There are still one or two forms which are not a part of the electronic process and these should be included as soon as possible.

Action Sheet 9 – Research and development. To be progressed but not with high priority. Existing centres of maritime excellence should be used if practicable.

Action Sheet 10 – One-stop administrative shops. This should only be progressed if it can be demonstrated that the one-stop-shops add value, reduce the administrative burden and reduce cost. It should be made clear how these facilities are to be funded and they must not simply place a greater burden on shortsea shipping.

Action Sheet 11 – Focal Points. This is working well in the UK

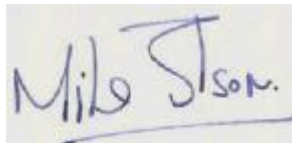
Action Sheet 12 – Shortsea Promotion Centres. These are central to the promotion of shortsea shipping in individual member states. Through the European Shortsea Network they provide mechanisms for multi-lateral partnerships and coordinated promotional campaigns. Many Centres are struggling to remain financially viable and Brussels should allocate a permanent budget to adequately fund all Shortsea Promotion Centres.

Action Sheet 13 – Promoting the image of shortsea shipping. Much progress has been made here but the industry still suffers from a low profile and a perception that it is not an up-to-date, reliable, cost effective and regular mode of transport. Brussels should put greater emphasis, through the promotion centres, to develop a coordinated promotional campaign.

Action Sheet 14 – Statistical information. This is important and should be progressed. Information should be made available in a user-friendly, on-line format.

I hope these comments are helpful and please feel free to contact me should you require further detail.

Yours sincerely

A handwritten signature in blue ink that reads "Mike Elsom." The signature is written in a cursive style and is underlined.

Mike Elsom
Director