



EUROPEAN MARITIME HERITAGE

Response to the

European Union Maritime Policy Green Paper

“Towards a future Maritime Policy for the Union:
A European vision for the oceans and seas”

Introduction

This submission has been prepared by **European Maritime Heritage (EMH)** in response to the Maritime Policy Green Paper presented by the European Commission.

EMH is a non-governmental European umbrella organisation, and its membership consists of national or regional organisations for private owners of traditional ships in operation, as well as of maritime museums and other interested bodies.

EMH primarily represents the interests of private owners and organisations which keep traditional European ships in operation. EMH's membership covers more than 5.000 boats and ships on a Europe-wide basis.

The objectives of EMH exclude any pursuit of profit, and are:

- to encourage mutual cooperation between the extensive community of organisations in Europe – including museums – involved in keeping maritime heritage alive,
- to act as a conduit for the exchange of knowledge, advice and assistance between such organisations,
- to contribute to the mutual understanding of different maritime cultures, and to increase public awareness of those cultures,
- to identify and promote historic water-borne links between European regions, publicising the role of waterways as a cultural bridge between nations,
- to study and resolve common problems identified in the course of preserving and operating traditional ships in Europe,
- to promote the use of traditional ships, traditional skills and of sail training as an inspiration for future modern shipping, and
- to provide official bodies of the European Union and the Council of Europe with a representative and consultative service, and advice on all aspects of preserving and operating historic ships.

Should the EU have an integrated maritime policy?

EMH and its members support the development of an integrated EU maritime policy.

In order to make this maritime policy integrated, intersectoral and multidisciplinary EMH finds it important continuously to involve stakeholders in the development process.

Previous to the preparation of the Maritime Policy Green Paper EMH offered its views and recommendations on the subject in the paper of October 2005: *“Europe’s Maritime Future is founded on Europe’s Maritime Heritage”*.

EMH finds that the consultation process related to the development of the Maritime Policy Green Paper has been very fruitful and has contributed in creating a broad understanding – both in general, and between specific trades and sectors – of the need for, and benefits from, a common maritime policy for the European Union.

EMH recommends:

Based on the good experiences with the consultation process EMH recommends that this process will be extended, moderated by the EU Commission Maritime Policy Task Force team, since it will be a valuable contribution to the development of a broad consensus for an all-embracing future maritime policy for the European Union.

EU policy area: Developing Europe's maritime skills and Expanding Sustainable Maritime Employment

The Green Paper acknowledges that the number of European seafarers is declining, and that jobs aboard the European merchant fleet to a large degree are considered low status jobs.

Despite the fact that the maritime industry is growing and expanding the public awareness of the industry is decreasing. The maritime trades are becoming less visible in the European cultural landscape and in the everyday life of the European citizens. And the high technology vessels carrying containers, bulk and liquids are – due to among other reasons port security measures¹ – seldom seen in ports accessible to the public.

Therefore the inspiration for young EU nationals to seek maritime careers must be found in maritime activities related to ports and ships which are now out of commercial service. Traditional ships in operation will add value to ports which have transformed themselves into touristic and/or historical focal points. At the same time there is a great opportunity to display the importance and the great contribution that the oceans offer the trade under the provision that port security measures are not limiting access to these special areas of maritime activity.

Also sail training activities contribute to the inspiration for young EU nationals to seek a maritime career. And since trainees participating in sail training programmes come from all religious, ethnic, national and social backgrounds, sail training activities also support the philosophical concept of a common maritime future.

At the same time sail training activities provide young EU nationals with basic and traditional seafaring skills enabling them to understand the “conditions of the trade”.

Furthermore traditional ships and sail training vessels are valuable contributors for developing interpersonal skills (such as leadership, teamwork, communication, self-esteem, problem solving; tolerance; managing conflict; international friendship and understanding), in addition to seamanship skills.

Thus traditional ships and sail training vessels can provide an important contribution when aiming at raising the status of jobs in the maritime sector as well as when aiming at promoting the concept of a common sea with a common maritime policy.

¹ The ISPS Code from IMO, extended in EU Directive 2006/65.

EMH recommends:

A future EU maritime policy should contain actions to improve the working conditions of the European fleet of traditional ships and sail training vessels in order to facilitate the use of these in the promotion process for maritime careers as well as for the concept of a common sea with a common maritime policy.

EU policy area: Developing Coastal Tourism

The Green Paper acknowledges the importance of coastal tourism in order for Europe to remain the No 1 world tourist destination, and it stresses how the competitiveness of coastal and island destinations can be increased when tourists are offered the opportunity to enjoy cultural and natural sites on the coast and in the rural or urban hinterlands, and diversified sea attractions and activities.

Traditional ships and sail training vessels play an important role in coastal tourism.

Every year more than 20 million spectators at maritime events spend in average € 25 per person/day thus generating € 500 million of income for the local tourism.

Add to this the 5.000 ships in operation spending in average annually at least 20.000 Euros each in maintenance thus generating a € 100 million turnover for the related craftsmen and suppliers.

Traditional ships taking tourists and locals out on day trips and longer cruises

- create awareness for the importance of maritime issues for Europe in a direct and emotional way,
- create awareness for the common European maritime roots,
- create awareness of being a part of a common European identity,
- facilitate (ecologically and economically sustainable) tourism development of regions, and
- are important catalysts for the development of regional identity.

Traditional ships can, if properly enabled by an adopted legislative framework, generate thousands of jobs in local and regional tourism within maintenance and operation.

EMH recommends:

A future EU maritime policy should promote the development of an adopted legislative framework which can enable the European fleet of traditional ships to develop, thus generating jobs and improved economy within local and regional coastal tourism.

EU policy area: Managing the Land/Sea Interface

Not only modern shipping and the modern ship building industry face challenges when it comes to the land/sea interface. Also traditional shipping is challenged.

All over Europe the nature of ports changes from being active cargo ports situated in the middle of cities to becoming remote terminals outside of the cities, and new ideas for using the former city harbour areas are developed.

Often plans for such city harbour areas include upscale housing projects. Living on the waterfront is popular, but in the same time a lot of harbour related industries must move; among them small shipyards specialised in maintaining and servicing traditional ships and other small ships.

However, since the nature of shipping already a long time ago changed into larger units, these small shipyards do not have the financial basis for relocating. This again means that the fundamental needs for maintenance of traditional ships are disappearing. Thus the owners of these ships are facing yet another challenge. However there is an opportunity, in conjunction with society, to both create employment and maintain handicraft traditions. Much can be learnt from understanding how ships were built over the years.

EMH recommends:

A future EU maritime policy should contain economical programmes in order to support harbour related industries specialised in maintaining and servicing traditional ships and other small vessels when they need to relocate, or when they need to comply with changing environmental standards.

EU policy area: International rules for global activities

With the gradual transition to more sustainable fisheries that is planned within the Union, initiatives to reduce the number of fishing vessels have been introduced in all coastal EU member states. Rewards have been given for taking fishing vessels out of service, and one of the tools used to fight Illegal, Unregulated and Unreported Fishing (IUU) has been to demand scrapping of such fishing vessels (literally cut into pieces) when taking them out of service.

However this practice has eliminated hundreds of historically valuable fishing vessels that could contribute to preserve historic knowledge of fishing and of the European fisheries. This phenomenon goes as well for several other types of vessels being inland waterways ships, tugboats and passenger vessels.

EMH recommends:

A future EU Maritime Policy should contain the possibility of preserving valuable historic fishing and other working vessels for future generations.

EU Policy area: The importance of the Marine Environment for the Sustainable use of our Marine Resources

Although there is no direct relation between on one side traditional shipping, and on the other side sustainable use of our marine resources and protection of the marine environment, in many people's minds traditional shipping is linked to these questions.

In most people's minds traditional shipping represents "old fashioned" values such as

- quality
- honesty
- purity, and
- respect for nature.

Thus traditional shipping has potential for becoming a role model for sustainable development of the maritime trades and for sustainable use of our marine resources.

EMH recommends:

The future EU maritime policy should support an extended use of the European fleet of traditional ships as role models for sustainable development and sustainable use of our marine resources.

EU policy area: Clustering

Although the European fleet of traditional ships consists of more than 5.000 vessels and craft, and the number is increasing, it is a common and widespread notion that traditional shipping is a phenomenon of the past ... remains of times gone which gradually will disappear. Nothing could be more wrong.

In the same time the people engaged in maintaining and keeping the maritime heritage floating and alive are often not aware that their activities are interlinked with modern shipping and European maritime culture in the broadest sense.

Altogether these factors have contributed to keeping the maritime heritage isolated from the rest of the maritime sector.

But the maritime sector in its broadest sense and the maritime heritage environment could benefit from being in contact with each other. Areas such as education, employment, safety, tourism, marine environment, and promotion of a maritime oriented mindset, are examples to where maritime heritage interlinks with modern shipping and the other maritime sectors in Europe.

EMH recommends:

The future EU maritime policy should promote the idea of maritime heritage organisations joining the various maritime clusters in EU member states.

EU policy area: Reclaiming Europe's Maritime Heritage and Reaffirming Europe's Maritime Identity

As described above traditional ships being one of the most important parts of Europe's maritime heritage offer valuable contributions for strengthening the future maritime identity of Europe.

Traditional ships

- create awareness for the importance of maritime issues for Europe in a direct and emotional way,
- create awareness of the common European maritime roots,
- facilitate (ecological and economical sustainable) tourism development of regions and is an important crystallisation element of regional identity,
- make young people interested in maritime careers,
- contribute to teaching social skills and team spirit in a modern and individualistic world,
- preserve maritime skills and craftsmanship which would otherwise get lost in a modern seafaring environment, and
- could, if properly enabled by an adopted legislative framework, generate thousands of jobs in maintaining and operating traditional ships in the context of local tourism.

But what can be done to support the historical ships in order to enable them to give these contributions?

Encouraging a sense of common identity

In order to be able to use maritime heritage and traditional ships as tools for creating a positive common European maritime identity, accurate figures must be developed ... especially concerning the Mediterranean countries and the new EU member states. The *European Atlas of the Seas* should include a proper inventory of the underwater archaeology and maritime heritage (traditional ships in operation, traditional ports, dockyards, naval bases, museums etc) in all EU coastal member states.

EMH offers:

EMH would be pleased to offer its expertise and network for cooperation with the EU Commission in compiling and maintaining such an inventory.

Support for existing achievements:

A. The PACE recommendation

The Parliamentary Assembly for the Council of Europe (PACE) asks the governments of Europe in its Recommendation No 1468/2000 to:

1. Support and encourage public and private bodies and voluntary associations which preserve historic ships and historic port facilities;

2. Encourage the display and use of these vessels for the education and enjoyment of the general public;
3. Encourage further development of a system of mutual acceptability by the maritime authorities of national standards for the safe operation of traditional ships in European waters.

After some initial attention the PACE recommendation, which had been positively answered by the European Governments, it can be observed, that these recommendations become less and less important for legislation and administration reality in several member states. Since the public interest has increased rather than decreased, it is time to express this public interest and the subsequent recommendations towards the governments again.

EMH recommends:

The future EU maritime policy should give the content and idea of the PACE recommendation 1468/2000 a new momentum towards the EU members states, e.g. by an awareness campaign and a structured assessment of the current legal framework and resulting obstacles for traditional ships in the member states.

B. The Memorandum of Understanding for Traditional Ships

A Memorandum of Understanding (MoU) for Traditional Ships was signed in Wilhelmshaven 2000 by the maritime administrations of 7 European countries: Denmark, Finland, Germany, the Netherlands, Spain, Sweden and the United Kingdom. Later also Estonia and Norway have signed. The MoU gives mutual recognition of each country's national regulation and certification regarding ship safety and competency of the crews, and it opens a possibility for traditional ships to call at ports in the signatory states.

National borders should not be a restriction for the use of traditional ships within the EU. The MoU is a step in the direction of allowing European traditional ships, regardless of their flag, to operate across the national borders within the EU.

EMH recommends:

The future EU maritime policy should promote further the process of establishing conditions under which European traditional ships can operate across the national borders within the EU.

C. The Barcelona Charter

EMH adopted 2002 the Barcelona Charter which gives a guideline for proper preservation of skills and traditional ships in operation.

EMH recommends:

The future EU maritime policy should promote the Barcelona Charter as the European guideline for proper preservation of skills and traditional ships in operation.

Support for future initiatives

D. Acknowledgement

Safety regulations for modern ships are always oriented to the latest state of technology which means an intrinsic conflict with living monuments. Modern ships are operated by small crews, but traditional ships are operated by large crews. Those large crews consist of a safety crew according to the safety certificate of the ship and a training crew, who offer the possibility to compensate automation by manpower. This leads to a conflict with the regulations regarding passengers and passenger ships. Safety rules for modern passenger ships are always oriented to large scale vessels and a maximum number of people on board. The majority of traditional ships were never built as passenger ships, are each far under 500 GT and have relatively few people on board. This anomaly demands revision of the concept of one uniform set of rules for all passenger ships.

No traditional ship, although being safe for decades and sometimes for centuries, can comply with modern regulations and remain traditional. The training crew are to be considered as persons on board like active participants in a living museum.

The definition of passengers and of passenger ships was made in 1912 following the sinking of SS Titanic. At that time defining crew and passengers was relevant, and no one could foresee that one day people would want to go travelling on ships specifically because they want to experience a seaman's life without being a seaman, i.e. not being a seaman, but also not being a passenger.

Times and conditions have changed since 1912, but the definitions have not. They are:

- A ship transporting more than 12 passengers must be registered as a passenger vessel, thus complying with SOLAS (if carrying out international voyages) or Directive 98/18 (if carrying out only national voyages).
- If the maximum number of passengers allowed on board is 12 or less, the ship must be registered as a cargo vessel.

The fact that traditional ships have multiple uses (sail training, passenger transport, entertainment, cultural promotion etc); the fact that questions such as dimensions, propulsion and traditional nature are not taken into account; and the fact that traditional ships cannot comply with modern safety regulations while still remaining traditional, makes the use of the above mentioned definitions complicated; sometimes even impossible.

EMH recommends:

A future EU maritime policy should take steps to

- **define persons on board traditional ships different from passengers, and**
- **define traditional ships different from passenger and cargo ships.**
- **establish the special value and status of traditional ships in EU policy and the necessity of equivalent but tailor made regulations based on risk assessment rather than on definitions ("passenger ship or not").**

E. Elimination of legal inconsistencies

Various legal inconsistencies exist in traditional shipping.

EMH recommends:

A future EU maritime policy should take step to eliminate the following legal inconsistencies:

- **Modern shipbuilding standards prohibit use of wood as structural material.** ²
- **Crew practices on traditional ships for keeping proper certificates.** ³
- **Ban of traditional wood conservation materials.**
- **Disposal of waste water is obligatory for ships carrying more than 15 persons.** ⁴
- **Coal fired steam engines and original diesel engines can not comply with modern emission standards.** ⁵
- **EU Scrapping rules threaten to eliminate the European traditional fishing fleet and the inland navigation fleet, because of the requirement to prove the inactivation by total destruction of the ship.**
- **Regulations on passage planning, garbage disposal etc. In general, a traditional sailing ship is not able to plan its passage like an engine driven vessel, and it regularly changes destination during its passage. This makes advance notice to ports complicated.** ⁶

F. Economical support

The majority of traditional ships are maintained and operated by the initiative of committed private individuals without any public support. This could be supported.

EMH recommends:

A future EU maritime policy should

- **enable traditional ships to generate income for upkeep without being considered as a business in the commercial meaning of the word,**
- **enable zero (0) VAT on repair and restoration of historic ships, and**
- **allow reduced VAT rates on fuel and coal.**
- **develop economical support programmes for restoration and preservation of historically valuable traditional ships.**

Europe's maritime future is founded on Europe's maritime heritage!

² SOLAS and EU Directive 98/18

³ STCW95 and ISM obligation in EU Directive 2006/336

⁴ MARPOL Annex IV and EU Directive 96/98.

⁵ MARPOL Annex IV

⁶ Garbage: MARPOL Annex V and EU Directive 2000/59; Passenger reports: EU Directive 98/41