



EUROPEAN MARITIME PILOTS' ASSOCIATION vzw

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EU Strategy for the Danube Region Public Consultation

The European Maritime Pilots Association represents the large majority of maritime pilots in Europe including the maritime pilots of the Danube Region. Pilotage services in the Danube region are services of general public interest and an important tool to ensure prevention against risks, protection of the environment and better access to the river and the coastal zones of the Black Sea.

We think that maritime transport by sea and on inland waterways is an efficient and environmental friendly transport mode. There certainly is a huge potential for the further development of maritime transport in the region. Not only through modal shift but also as a consequence of growing import and export which causes a higher demand for transport. EMPA is convinced that the European Commission can play an important role to meet this objectives.

The EU strategy for the Danube region can take stock of existing successful examples of transport by coasters and barges on the inland waterways of West Europe (Elbe, Rhine, Maas, Scheldt, Seine ...). Also in the Danube region there is need for promotion of inland waterways transport and short sea shipping showing the benefits of these transport modes. However success can only be achieved if there is also a seamless connection to other transport modes such as rail and road.

- Development of local promotion centres for SSS and inland waterways. Exchange of good practices with other promotion centres in the EU.
- Study of the missing connections to other transport modes.
- Research into the feasibility of inland container terminals as hubs or nodal points for the local industry.

Is the fairway capacity of the Danube river fully used ?

For an improved access to the region and the hinterland, investments in port infrastructure and fairway maintenance should be encouraged.

- Research into the navigation on the Danube and draught restrictions.
- Improvements to the fairway through surveying, dredging, aids to navigation. A correct estimation of the actual needs can be obtained through consultation of the local pilot services.

For the safety and efficiency of the maritime traffic flow, full advantage should be taken of the experience and knowledge of the existing pilot services. The importance of a well organised pilot service on the Danube can not be overestimated. Pilotage on the Danube is based on the UN Convention no.518 "Convention regarding the regime of navigation on the Danube", signed in Belgrado 18th august 1948.

Using a pilot means better planning of the traffic, optimal use of the fairway and port capacity, effective protection of the environment and population by prevention of collisions

and groundings. Pilots on board a vessel are also an early warning system. According to Directive 2009/16/EC on Port State Control, pilots have an obligation to report apparent anomalies on board. The same applies for maritime security, pilots can report any suspicious activity to the authorities before arrival in port.

A good regulation of pilotage will also in the future be crucial to guarantee a level playing field and high quality standards. The maritime administration of each country, as competent pilotage authority, should continue to monitor the pilotage on the Danube and the coastal ports. However a uniform approach with regular cross-border contacts between Ukraine and Romania remains important. In particular regarding the training and certification, service level and quality management. Through EMPA the pilots of Ukraine and Romania, Bulgaria, Turkey have set already an example with cross-border contacts on best practices for training and education, the organisation of pilot services, etc.

- Further research in ways of co-operation between the pilots services with a potential to save operational costs and improve the service through exchange of best practices. A good example here is the co-operation between the Dutch and Belgian pilot services on the River Scheldt.

We like to repeat our concern that in pilotage there is no room for competition as there might be in other port services. Experiments have clearly shown that competition leads inevitably to : less or late investments in material and training of pilots, cherry picking, disadvantages of scale, uncertainty that safe and efficient pilotage is provided to all users on a non-discriminatory basis, higher pilot dues and even corruption to obtain a market share.

Maritime access for sea ships to the Danube Region and the Black Sea is through the Bosphorus. EMPA shares the concern of the Turkish Government and the City of Istanbul for a safe navigation through the dense traffic and very demanding conditions of the Bosphorus. This can only be achieved through pilotage and traffic management.

- The European Commission could support the position of the Turkish Government when addressing the international shipping community.

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