



Response of FEPORT, ETA and EMPA to the European Commission's call for evidence related to the European Ports Strategy.

The Federation of European Private Port Companies and Terminals (FEPORT), the European Tugowners Association (ETA), and the European Maritime Pilots' Association (EMPA) have come together to submit this joint contribution to the European Commission's call for evidence on the EU Ports Strategy. As representatives of three closely interlinked sectors, private terminal operations, towage, and pilotage, we believe it is both timely and necessary to present a unified perspective. Our members operate side by side in the daily functioning of European ports and face many of the same operational, regulatory, and strategic challenges. We are collectively convinced that enhancing the resilience of Europe's ports must be a central pillar of the forthcoming strategy. This shared vision underpins our joint submission and reflects our commitment to supporting a resilient, efficient, and forward-looking European port ecosystem.

Port Services: Instrumental to safety in EU ports.

Ports are essential interfaces between sea and land transport, forming a critical component of Europe's logistics network. However, their role extends well beyond that of simple transfer hubs. They are vibrant, interconnected systems where infrastructure, operations, and services work in tandem. Within this intricate framework, services such as pilotage and towage are fundamental to ensuring ports operate safely, efficiently, and sustainably.

It is crucial that the European Ports Strategy explicitly acknowledges this interdependence and the vital role of port services, such as pilotage, towage, cargo handling and logistics related services, icebreaking and mooring. Their primary purpose is to uphold safety while proposing efficient services: protecting lives, maintaining port infrastructure, navigating vessels securely, accommodating ships in a safe manner, and contributing to environmental protection. Pilotage enables accurate navigation in restricted waters, while towage plays a key role in aiding pilots and also in docking procedures and emergency response. Alongside terminal operators, these services are central to maintaining the reliability and robustness of port operations.

Therefore, the Strategy should clearly endorse the strategic value of supporting all port-related services and infrastructure. Whether through targeted investment, clear regulatory frameworks, or supportive policy measures, the EU must treat cargo handling, pilotage and towage as instrumental to safety in ports.

State Aid for ports

Enhancing the strength of European ports must be the cornerstone of the upcoming EU Ports Strategy, as the EU's resilience is directly tied to the strength of its ports. We see efficient infrastructure, digitalisation, intermodal connectivity, regulatory clarity, innovation, workforce skills, and sustainability as key drivers of resilience for ports and also for port services. To support these, we call for the creation of a dedicated EU State Aid Framework for Ports. This framework should empower Member States to provide strategic, proportionate, and legally sound support for essential port investments—such as low-emission equipment, alternative fuel infrastructure, and digitalisation—that private operators and port service providers cannot shoulder alone while staying globally competitive.

We have observed that current EU funding instruments are not fit for purpose. The Connecting Europe Facility (CEF) remains outdated, failing to reflect recent TEN-T revisions that include superstructures. The Innovation Fund excludes practical decarbonisation projects, and the Cohesion Fund is geographically limited and inconsistent. Other frameworks like CEEAG, CISAF, and the upcoming LMTG either exclude ports or apply criteria that do not reflect operational realities. As a result, maritime ports are the only transport sector without a modern, comprehensive State aid framework, placing us at a disadvantage compared to aviation, rail, and inland waterways.

We therefore urge the EU to adopt a dual-instrument approach: a block exemption regulation and complementary State aid guidelines. This would mirror existing frameworks in other transport sectors and provide the legal clarity and predictability we need. Our proposal is firmly grounded in Article 93 of the TFEU and aligns with EU policies on mobility, decarbonisation, and defence. A dedicated framework would not only facilitate critical infrastructure investments but also support dual-use facilities essential for military mobility and resilience, ensuring coherence with EU strategic goals and avoiding fragmented national approaches.

Such an approach would be instrumental in enabling port services, such as pilotage and towage, to deal with the pressures of decarbonisation. But it would also be instrumental in the skilling of port services professionals, and digitalisation of port services.

Human Capital Resilience

Human capital resilience refers to the capacity of people to adapt, recover and thrive in changing circumstances such as the current geopolitical landscape, climate change, and technological advancements. Seafarers, port workers, and all other maritime professionals form the backbone of global trade. Their ability to adapt to evolving challenges directly impacts supply chain continuity and maritime safety. The human element is indispensable to the port sector's success. A resilient maritime workforce will strengthen operational efficiency and elevate global economic competitiveness.

We need to invest in people through a human centred port policy amidst navigating the European Union's decarbonisation and digitalisation objectives. It is vital to attract and

retain maritime professionals with adequate education and training and by looking after the well-being of all port workers. Maritime careers can be made more attractive by investing in a safety culture, continuous training, fostering inclusive and supportive work environments, and promoting mental and physical health.

By prioritising the development and well-being of maritime professionals, the sector will ensure to lead the transition towards digitalisation and more sustainable shipping. It is important to recognise their skills and knowledge as a key resource in today's rapidly evolving world. Safeguarding the independence and quality of strategic port services will protect operational integrity and ensure continuity of service.

Digitalisation

The comprehensive digitalisation of all port services—seamlessly integrated with both port infrastructure and vessel communication systems—is a cornerstone for developing a modern, efficient, and resilient port ecosystem. The EU Ports Strategy should clearly show the path towards the digitalisation(?) of ports. To unlock the full potential of digital transformation, it is imperative to ensure interoperability across the diverse digital platforms used by shipping lines, port authorities, service providers, and hinterland logistics operators. Such interoperability enables the smooth and secure exchange of information, fostering real-time coordination and data-driven decision-making throughout the maritime supply chain.

This level of integration not only streamlines operations and reduces administrative burdens but also significantly enhances safety and reliability. Capabilities such as predictive maintenance, traffic management, and rapid emergency response become more effective when supported by interconnected digital systems.

However, as ports become increasingly dependent on digital technologies, they also face heightened exposure to cyber threats. The growing complexity and interconnectivity of digital infrastructure make ports attractive targets for malicious actors. Therefore, the European Ports Strategy must place cybersecurity at the forefront, establishing robust, harmonised frameworks that protect critical infrastructure, ensure operational continuity, and build trust among stakeholders.

A secure and standardised digital environment will be essential not only for safeguarding Europe's ports but also for enabling innovation, competitiveness, and sustainable growth across the maritime sector.

Regulation that is fit for purpose

We urge the European Commission to ensure that the forthcoming EU Ports Strategy delivers on its promise to simplify and streamline regulations, making them truly fit for purpose. Regulatory complexity must not become a barrier to competitiveness, neither within the EU nor in relation to non-EU ports. A level playing field is essential, and this requires harmonised, proportionate rules that avoid unnecessary administrative burdens. The strategy must recognise that ports are not only gateways to trade but also strategic assets for energy, defence, and innovation. Simplified regulation should enable ports to operate efficiently,

attract investment, and adapt to evolving global dynamics without being weighed down by fragmented or overly rigid frameworks.

At the same time, future regulation must strike a careful balance between competitiveness and sustainability. Europe cannot afford to lose its industrial edge due to well-intentioned but poorly calibrated rules. Measures such as the EU Emissions Trading System (EU ETS) must be implemented in a way that avoids distorting competition between European and non-European ports.

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