



European Tugowners Association

The European Tugowners Association response to the Call for evidence on the European Ports Strategy.

The European Tugowners Association (ETA) welcomes the European Commission's initiative to develop a comprehensive European Ports Strategy. As strategic entry points to the continent and vital links in the global supply chain, ports play a critical role in Europe's economic resilience and connectivity. In light of the current geopolitical climate, the need for a unified and forward-looking strategy has never been more pressing.

The European Ports Strategy should adopt a sustainability framework that balances competitiveness, environmental considerations, and social responsibility. Each of these pillars is essential to ensuring that ports remain dynamic, resilient, and future-ready.

The Port EcoSystem

Ports serve as critical junctions between maritime and land-based transport, forming an essential component of the broader logistics chain. However, ports are not merely transit points—they are complex environments with their own internal ecosystems comprising diverse actors and services.

The European Ports Strategy should explicitly recognise this intricate ecosystem, acknowledging the interdependence of infrastructure, operations, and services. Among these, port services, such as towage, pilotage, icebreaking, dredging and mooring, play a pivotal role. Their primary and overarching objective is safety: safeguarding personnel working in and around ports, protecting port infrastructure and assets, ensuring the safe navigation of vessels, and contributing to environmental protection and operational efficiency.

Towage, in particular, is indispensable to port safety. Tugboats are not only essential for manoeuvring vessels safely into and out of port but also serve as frontline responders in emergencies. Their presence helps prevent damage to critical infrastructure and mitigates risks to the marine environment. Harbour tugs are often the first to respond to incidents such as fires, oil spills, or vessel distress, both within port boundaries and in adjacent coastal areas. Their role in preventing environmental disasters and ensuring rapid intervention underscores their strategic importance.



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In light of this, the Strategy must affirm the criticality of enabling and supporting port services, not only as operational necessities but as pillars of safety, security, resilience, and sustainability within the port ecosystem.

Competitiveness

For European ports to remain competitive, it is essential to establish a level playing field both within the European Union and in relation to non-European ports. Regulatory frameworks should be designed to facilitate this balance, ensuring fair conditions across the global maritime landscape.

A pertinent example of a regulation impacting competitiveness is the maritime EU Emissions Trading System (EU ETS). While the principle that “the polluter pays” is fundamentally sound, its implementation must be global in scope. Applying such measures exclusively to vessels calling at European ports are distorting competition and disproportionately affecting European port operators and service providers, including tug operators. This could undermine the strategic position of European ports and hinder efforts to achieve climate goals in a fair and effective manner.

Therefore, in light of the forthcoming IMO NZF, the ETA urges the European Union to ensure full alignment between the EU ETS for maritime and the global regulatory framework under development at the IMO. A fragmented regulatory landscape risks undermining both the EU’s climate leadership and the effectiveness of global decarbonisation efforts. Harmonisation is essential to avoid competitive distortions, ensure a level playing field for European ports and shipping operators, and reduce the administrative burden on maritime stakeholders. The EU’s pioneering role in maritime decarbonisation, through the inclusion of shipping in the EU ETS and the adoption of the FuelEU Maritime Regulation, must evolve into a collaborative leadership model that supports and strengthens global climate action.

The case for towage and the upcoming review of the MRV regulation

Given the upcoming review of the MRV Regulation in relation to vessels between 400GT and 4999GT, considering that this is the prelude to EU ETS, the ETA advocates for the exclusion of harbour towage from the scope of these two regulations. Tug operations are fundamentally distinct from other maritime activities in that they are not autonomous but are carried out strictly under the direction of external authorities such as the ship’s



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master, port pilot, or harbour master. The power used, and thus the emissions generated, are not discretionary but are dictated by the operational demands of the assisted vessel and the safety protocols of the port. As such, emissions from tugs are a direct consequence of mandatory safety procedures rather than commercial navigation choices. Including towage in the EU ETS would not incentivise emission reductions, as tug masters cannot alter their operational profile without compromising safety or disobeying orders. Any emissions recorded would merely reflect compliance with safety-critical instructions, not opportunities for mitigation.

Furthermore, harbour tugs are generally between 250GT and 700GT. In the case of towage, the 400GT cutoff does not reflect environmental performance or emissions intensity but instead penalises newer, more capable tugs that are often designed to meet higher safety and environmental standards. As a result, two tugs performing identical tasks in the same port, one slightly above and one slightly below the 400 GT threshold, would be treated unequally under the EU ETS, despite potentially having similar emissions profiles. This delineation undermines the principle of a level playing field. It risks incentivising the continued use of older, less efficient tugs simply because they fall below the regulatory threshold. At the same time, operators who have invested in modern, cleaner, and more versatile vessels face additional compliance costs (for example, MRV). Such a framework not only contradicts the EU's broader decarbonisation goals but also creates operational inefficiencies and market imbalances within the towage sector.

Ports as Energy Hubs

Ports should not be viewed merely as repositories for alternative fuels, but as dynamic energy hubs with the capacity to produce, store, and distribute clean energy. In this context, ports should be granted access to funding opportunities equivalent to those available to innovation centres across Europe.

The availability and affordability of clean fuels has become a pressing concern within the European maritime sector. Shipowners must be assured of a reliable and reasonably priced supply of alternative fuels to support the transition to sustainable operations. To achieve this, European ports must be equipped with the necessary investment, infrastructure, and resources to serve as strategic energy hubs, not only for maritime transport but also for land-based logistics.



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In the case of towage, where the future fuel mix remains uncertain, early adopters face significant challenges. These include elevated costs, technological risk, and, critically, the limited availability of alternative energy sources within port environments. Addressing these constraints requires targeted support and investment to ensure that towage operators can contribute meaningfully to climate goals while maintaining their essential safety functions.

Security

Ports are undeniably critical to Europe's security, particularly in the current strained geopolitical climate. While the ETA supports the ambitions outlined in the EU's Readiness 2030 plan, it urges the European Commission to formally recognise harbour tugs as part of the critical civil-defence infrastructure within ports. These vessels are not only essential for safe vessel manoeuvring but also serve as first responders in emergencies such as fires, oil spills, and vessel distress.

In times of heightened geopolitical tension, harbour tugs play a critical role in safeguarding port infrastructure and ensuring operational continuity. Their ability to manoeuvre large vessels quickly and precisely becomes vital for enforcing rapid port closures, rerouting traffic, or evacuating high-value or vulnerable assets. Tugs can also assist in the controlled docking and undocking of military or humanitarian vessels under tight security protocols, ensuring that strategic maritime operations are not delayed. Moreover, in the event of sabotage, blockades, or attacks on navigation systems, tugs provide a reliable, manual fallback for vessel movement, reducing dependency on potentially compromised digital systems. Their presence enhances the port's resilience and responsiveness, making them an indispensable asset in national and regional security planning.

The dual investment strategy embedded within Readiness 2030 should include harbour towage. This strategy supports early-stage innovation, which is vital for towage operators exploring alternative propulsion systems, whether hybrid, hydrogen, methanol, or electric. These operators often face high upfront costs and uncertain returns. EU funding could play a transformative role by supporting pilot projects, retrofitting existing fleets, and investing in the digitalisation and automation of towage operations.



Digitalisation

Digitalisation of all port services—integrated with port infrastructure and vessel communication systems—is essential for building a modern, efficient, and resilient port ecosystem. Ensuring interoperability between digital platforms used by shipping lines, port authorities, service providers, and hinterland logistics is critical to achieving seamless information flow. This integration not only enhances operational efficiency but also significantly improves safety by enabling real-time coordination, predictive maintenance, and faster emergency response. However, as ports become increasingly reliant on digital systems, they also become more vulnerable to cyber threats. The European Ports Strategy must therefore prioritise robust cybersecurity frameworks to protect critical infrastructure and ensure business continuity. A harmonised and secure digital environment will be key to safeguarding Europe's ports while enabling innovation and sustainable growth.

A human centric approach

The European Ports Strategy should adopt a human-centred approach to make the maritime sector more attractive to young people and strive towards a more inclusive workforce. It should support those already in the industry by continuing to develop both traditional and technological skills. As maritime technology advances, collaboration between cutting-edge technology and human expertise will be paramount in dealing with the challenges ahead and achieving sustainable maritime practices. In this context, targeted efforts to reskill and upskill the workforce are essential, not only to keep pace with digital innovation but also to meet the demands of the green transition. Equipping port professionals with the competencies needed for decarbonisation, automation, and data-driven operations will be key to ensuring that no one is left behind as the sector evolves.

EU State Aid Framework for Ports

ETA supports the call of FEPORT that the EU Port Strategy should explicitly support the development of a dedicated EU State Aid Framework for Ports, comprising both a



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targeted block exemption instrument and accompanying State aid guidelines, to allow Member States to provide proportionate, strategic, and EU-law compliant support to port investments that are essential to meeting Union objectives. Furthermore, ETA advocates that such EU State Aid Framework for Ports should also explicitly include port services such as harbour towage.

Enhancing the strength of European ports must be the cornerstone of the upcoming EU Port 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 services providers cannot shoulder alone while staying globally competitive.

The appropriate funding instruments are required in order to have efficient infrastructure, digitalisation, intermodal connectivity, regulatory clarity, innovation, workforce skills, and sustainability as key drivers of resilience for ports and port services. 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.

Therefore, ETA calls on 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



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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 towage, to deal with the pressures and costs of decarbonisation. Additionally, it would be instrumental in skilling port services professionals and digitalising port services.

The European Tugowners Association (ETA) stands as the sole voice of the towage sector in Europe, representing over 75% of all harbour tugs operating in European ports. Established more than 60 years ago, ETA has consistently championed the interests of the industry and remains the only organisation of its kind representing towage at the international level.

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