

**Transition Pathway for the Mobility Ecosystem
European Commission Staff Working Document
SEA Europe's submission to the public consultation**

Brussels, 29 April 2022

On 27 April, SEA Europe submitted comments to the European Commission's Staff Working Document "*For a resilient, innovative, sustainable and digital mobility ecosystem: Scenarios for a transition pathway*" (SWD (2022) 16 final), in the context of a public consultation that was launched in January 2022.

SEA Europe fully supports the transition pathways presented in this Staff Working Document as a good basis for the mobility ecosystem to discuss challenges, synergies, and future scenarios on resilience, innovation, sustainability, and digitalization.

At the same time, SEA Europe is concerned that the strategic importance, strengths, and potential of the maritime technology sector for Europe has not been accurately reflected in the Staff Working Document. For instance, Europe's strong dependency on Asian shipbuilding, because of decades of unfair competition and trade protectionism, was not highlighted, and the unique and longstanding legal gap in WTO and EU legislation, which prevents European shipyards to apply trade defence remedies against Asia's market distortions and unfair practices, was not mentioned.

For the competitiveness and resilience of the maritime technology sector, SEA Europe calls, amongst others, to close the unique and longstanding legal gap in WTO and EU trade defence legislation and to adopt measures that preserve Europe's leadership in high-tech, high added-value markets, enable shipyards to regain some lost shipbuilding markets, and support the maritime technology sector to tap into new promising markets.

For the greening of the mobility ecosystem, SEA Europe reiterates the need for an EU-wide programme of fleet renewal and retrofitting as well as for technological neutrality, a goal-based and life-cycle well-to wake approach. The investments made in climate-optimized vessels should foster economic added value, regional industrial growth, and employment creation in Europe, with positive spill-over effects throughout the full European maritime value chain.

For the digitalization of the mobility system, SEA Europe calls for significant investments in RDI for technologies in digitalisation, automation, and autonomy in the shipbuilding processes, for a European strategy vision on a smart waterborne transport ecosystem and for concrete steps on the development of autonomous ships for inland, coastal, offshore activities and short sea shipping.

On skills, SEA Europe calls at EU-level for joint education and training modules and curricula based on the specific professional profiles of the maritime technology sector, to upskill and reskill newcomers and current workforce (e.g., to cope with the twin transition). In addition, SEA Europe calls for measures to attract new people and to address current skills' shortage.

On investments and financing, SEA Europe calls to make access to (sustainable) finance attractive for maritime projects in Europe and to put in place a predictable and well-communicated EU policy and regulatory framework that offers legal certainty to the investments from the entire maritime sector.

On zero-emission waterborne transport, SEA Europe reiterates the importance of the co-Programmed Partnership for R&D investments and calls for a dedicated fund, financed from auction revenues collected under EU ETS through the inclusion of shipping and from penalties for non-compliance under FuelEU Maritime,

to support the massive green investments needed for a zero-emission waterborne (transport) sector in accordance with the European Green Deal goals.

“To have a structural dialogue between the industry and policymakers to find adequate (regulatory and financial) solutions for the specific challenges, needs, bottlenecks, gaps and opportunities of the maritime technology sector in Europe, a dedicated “Waterborne Expert Group” should be established soonest”, says Christophe Tytgat, SEA Europe’s Secretary General.

Background Note:

SEA Europe represents close to 100% of the European shipbuilding industry in 16 nations, encompassing the production, maintenance, repair and conversion of all types of ships and floating structures, commercial as well as naval, including the full supply chain with the various producers of maritime systems, equipment material, and services.

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