

**INTERNATIONAL CHAMBER OF SHIPPING (ICS)  
INTERNATIONAL SHIPPING FEDERATION (ISF)**

**TOWARDS A FUTURE MARITIME POLICY FOR THE UNION:  
A EUROPEAN VISION FOR CLEANER SEAS AND CLEARER OCEANS**

**ADDITIONAL COMMENTS ON EUROPEAN COMMISSION 'GREEN PAPER'  
(COM(2006)275 FINAL, 7 JUNE 2007)**

**CONSULTATION WITH THE SHIPPING INDUSTRY**

These remarks are made on behalf of the **International Chamber of Shipping (ICS)** and the **International Shipping Federation (ISF)**. ICS is the principal international trade association for the shipping industry, and ISF is the leading international employers' organisation for shipowners.

ICS and ISF represent all sectors and trades, and about 70% of the world's merchant tonnage. ICS and ISF membership comprises national shipowners' associations from 40 countries, including members of the **European Community Shipowners' Associations (ECSA)**, with whom ICS and ISF work closely on a day-to-day basis.

These remarks are submitted following the meeting between Commissioner Borg and ICS Chairman/ISF President, Spyros Polemis, on 23 March 2007, at which the means of enhancing consultation between the Commission and the international shipping industry were discussed, and at which it was suggested that further comments on means of improved consultation might be submitted. Our remarks here specifically address consultation with the international industry, though we recognise that consultation with the European industry (as represented by ECSA) should be regarded as being of equal importance. Whilst the industry does not always expect the Commission to agree with its views, it is important that the industry's views are heard and understood so that the Commission is fully aware of the implications of its proposals. We also suggest that it has proved to be very useful, both for industry and the Commission, for there to be an opportunity to discuss the Commission's ideas concerning possible regulatory proposals **before** they have been developed to an advanced stage and published for formal consultation. This applies to any ideas that impact directly on international shipping that may be developed by any of the Commission's Directorates General.

We suggest that a model for such consultation with the international shipping industry might include the following elements.

Commission Directorates who are considering legislation or other proposals which might have an impact on international shipping should contact ICS and/or ISF.

An informal exchange of views should take place on the Commission's intentions such that ICS/ISF (and other comparable international shipping organisations) can provide information on the impact on international shipping of the proposed regulation, and offer suggestions on how the Commission's objectives might be best achieved. This should include the opportunity for an 'open' discussion between the parties.

Such an approach has in the past been followed on several occasions, particularly by DG Tren who we believe has recognised the importance of hearing the views of the international shipping industry and has established helpful consultation mechanisms for this purpose.

For example, prior to and during the preparation of the proposals contained in the Third Maritime Safety Package, DG Tren organised consultation meetings with both international and European shipping industry representatives, in 2004 and 2005, followed by opportunities for those representatives to submit detailed written comments on DG Tren's tentative ideas.

Noting that a very large proportion of the Green Paper addresses issues directly relevant to global shipping, we therefore suggest that mechanisms as suggested above for specific consultation with international shipping industry interests are developed with regard to the current EU Maritime Policy Review, especially as and when more definitive proposals are developed following the initial consultation exercise which concludes in June.

However, we also propose that such mechanisms should apply when ideas that impact on shipping are developed by other Directorates General, not least those concerning international shipping and the environment.

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May 2007