



Contribution of the European Sea Ports Organisation to the online public consultation on an EU Contingency plan for transport

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The European Sea Ports Organisation (ESPO) welcomes the Commission's objective to draw up a Contingency plan for transport, which aims to provide guidance for European freight and passenger transport in times of crisis, by drawing on lessons learnt from the COVID-19 pandemic.

About 75% of Europe's trade with the rest of the world and more than one third of intra-European trade is shipped through its seaports. Beyond the traditional maritime role of ports as entry/exit gates for goods and people, European ports are also at the crossroads of supply chains, are nodes of transport and energy, clusters of industry, hubs of circularity and are an important player in the blue economy.

Given the strategic importance of ports for the European economy and security of supply, ESPO would like to highlight the following priorities for the EU's upcoming Contingency plan for transport:

1. European ports remained operational during the COVID-19 crisis

Since the start of the COVID-19 crisis, Europe's ports have succeeded to remain operational and did everything in their power to ensure the security of supply in Europe. They have successfully activated contingency plans, thereby fulfilling their role as essential and critical infrastructures. By being fully operational, flexible and by adapting quickly to the circumstances, European ports have contributed to the resilience of supply chains to the benefit of European citizens and Europe's economy as a whole. This shows that the current governance models of European ports, whereby the port can proactively develop strategies and set out its own crisis management, are a solid basis in situations where the critical role of ports is coming to the forefront.

ESPO strongly believes, that an EU Contingency plan for transport should encompass all European ports, as each one can play a specific but crucial role in ensuring the supply for a certain region or of a certain commodity. Furthermore, European ports have demonstrated their resilience and ability to operate in crisis situations. The incident with the ship "Ever Given", which blocked the Suez Canal, has demonstrated that ports can play a role as buffer in a disrupted supply chain. In this context, the port managing bodies have in some cases played a crucial role in trying to mitigate the impact of disruptions by proposing temporary solutions to the different partners in the supply chain.

2. The Green Lanes proved to be a well working instrument

During the heat of the COVID-19 crisis, some Member States implemented burdensome border procedures or even closed their national land borders in order to prevent the spread of the virus. As a consequence, transport of and trade in goods suffered, resulting in supply shortages within the EU. The Commission's *Guidelines for border management measures to protect health and ensure the availability of goods and essential services* requested Member States to designate all relevant internal border-crossing points on the Trans-European Transport Network (TEN-T) as 'Green Lane' border crossings. The 'Green Lanes' ensured that those border crossings throughout the EU remained open to all freight vehicles, and ensured that any border controls would not take more than 15 minutes.

Goods arrive to and depart from ports by road, rail and inland waterways, thereby often crossing multiple borders of European Member States. European ports are therefore dependent on the free movement of goods and persons, and by consequence on a well-functioning EU Single Market. ESPO fully supports the 'Green Lanes' concept, which should be taken up in the EU's Contingency plan for transport.

In addition, European ports call for a broader approach of the EU Contingency Plan for Transport. It should address not only disruptions in case of border closings, but also disruptions in cases of infrastructure damages. Recent floods, cyberattacks and previous incidents have demonstrated that contingency plans are needed for the main TEN-T axes.

3. Transport and port workers should be designated as essential workers

During the COVID-19 crisis, health measures taken in Member States including border closures and general lockdowns, had an impact on the operability of the port sector. A port consists of a multitude of sectors and industries, which often depend on each other to remain operational. To enable functional port operations in future crises situations, transport and port workers should be designated as essential workers, enabling them to work and move without restrictions. It is important to define port workers in a broader sense than limited to dock work, as a port cannot remain operational without, for example, mandatory maintenance and equipment checks.

The COVID-19 pandemic has also revealed the vulnerability of transport workers on board of vessels. The contingency plan should offer guidance to Member States on how to cooperate better to enable crew changes in times of crisis.

The European Sea Ports Organisation (ESPO) represents the port authorities, port associations and port administrations of the seaports of 22 Member States of the European Union and Norway at political level. ESPO has also observer members in Albania, Iceland, the United Kingdom, Ukraine and Israel. ESPO is the principal interface between the European seaport authorities and the European institutions. In addition to representing the interests of European ports, ESPO is a knowledge network which brings together professionals from the port sector and national port organizations. ESPO was created in 1993.