



## ANNUAL REPORT 2023

European Dredgers  
Strategic Enablers  
of Europe's  
Blue and Green  
Economy for more  
than 30 years



EUROPEAN DREDGING ASSOCIATION









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## TABLE OF CONTENTS

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<b>EuDA's Sustainability Statement</b>	<b>6</b>
<b>industrial policy</b>	<b>8</b>
<b>international markets policy</b>	<b>14</b>
<b>environmental policy</b>	<b>32</b>
<b>climate change and coastal protection policy</b>	<b>42</b>
<b>social policy</b>	<b>52</b>
<b>research and development policy</b>	<b>60</b>
<b>EuDA members and organisation</b>	<b>66</b>

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“EuDA is the official interface  
between the European Dredging  
Industry and the European  
Institutions”

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## EUDA'S SUSTAINABILITY STATEMENT

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Organisations as well as individual companies interact directly or indirectly with the environment through what they do and how they do it.

**What dredging companies do** is projects. Well-designed multiple purpose projects can contribute to sustainability by adding value to the environment, the economy and society during the entire life cycle of the infrastructure.

**How dredging companies do projects** can also provide substantial contributions to sustainability during the execution of the project (e.g. construction of infrastructures) by reducing impacts on or improving the state of the environment and/or society (e.g. use nature-based solutions, train & educate local workforce).

**What EuDA does** is to interface between the dredging industry and the European administrations. EuDA's contribution to sustainability results from the adaptation and improvement of the EU regulatory and governance frameworks in order to facilitate and maximise EuDA's individual members' contributions to sustainability.

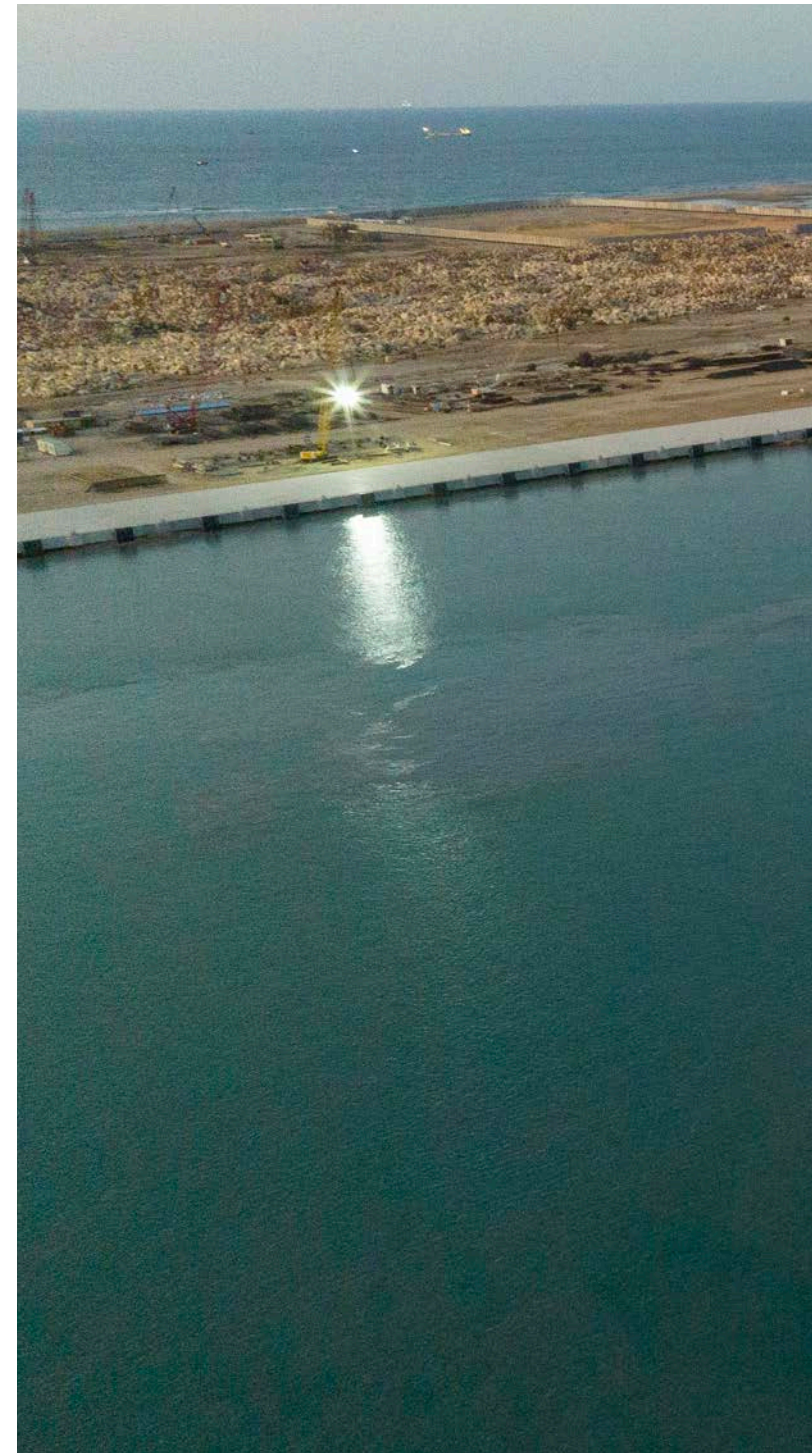
**How EuDA does it** is referring to the environmental footprint of the secretariat and the steps taken to reduce it.

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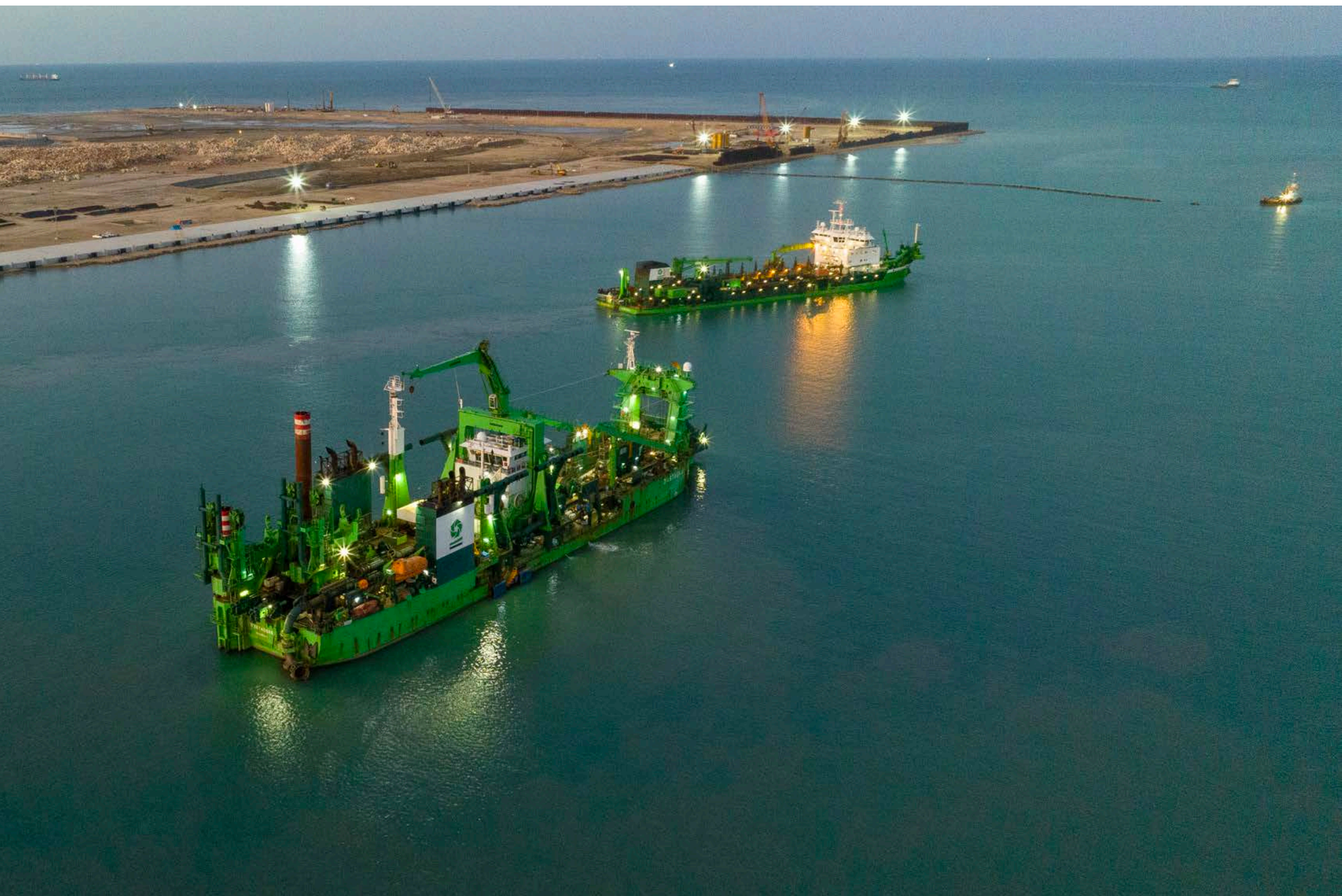
“If you want to move fast,  
go alone,  
if you want to go far,  
move together”

African Proverb

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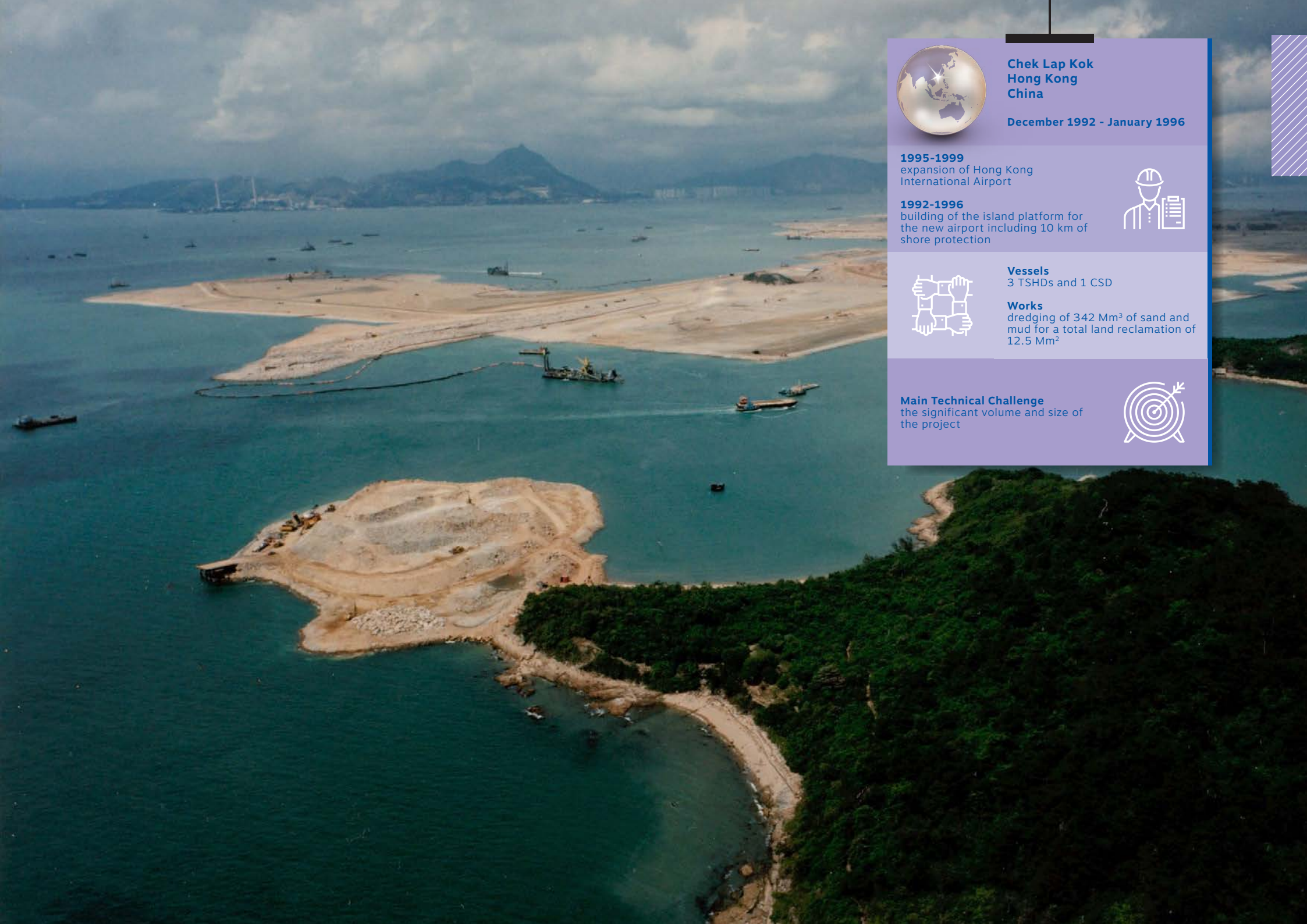
**INDUSTRIAL  
POLICY**

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**1992-1999** Expansion of Hong Kong International Airport





## Chek Lap Kok Hong Kong China

December 1992 - January 1996

**1995-1999**  
expansion of Hong Kong  
International Airport

**1992-1996**  
building of the island platform for  
the new airport including 10 km of  
shore protection



**Vessels**  
3 TSHDs and 1 CSD

**Works**  
dredging of 342 Mm<sup>3</sup> of sand and  
mud for a total land reclamation of  
12.5 Mm<sup>2</sup>

**Main Technical Challenge**  
the significant volume and size of  
the project





### 30 Years of enabling

#### Europe's Blue and Green Economy

Europe's construction from its very onset was done thanks to the global sea and land trade routes. As far as the sea and inland trade routes are concerned, European Dredgers have always been strategic enablers of Europe's construction.

The European Dredging Association (EuDA) is celebrating its 30<sup>th</sup> Anniversary in 2023. In the past 30 years, European Dredging Companies have continued to grow together into a problem-solving and solution-oriented sector. The unique knowledge and expertise of its dredgers allows Europe to remain open and connected with its global supply and export markets: **Dredging is a strategic enabler of Europe's Blue and Green Economy.**

To remain competitive in the global markets against the often low-tech, low wage, low standards and low added-value competitors, European Dredgers had to provide more and more high added-value services to their clients. Indeed, European Dredgers:

- provide key **enabling services** to the waterborne transport infrastructure, to the underwater communications infrastructure, to the offshore energy infrastructure, ...
- contribute to improving **Europe's Strategic Autonomy**, by accessing strategic resources through

deep-sea mining and aggregate mining.

- contribute to **Climate Change Adaptation** by building coastal defences against storms and floods, protections against sea level rise.
- contribute to **Climate Change Mitigation** by installing and maintaining offshore wind farms, by restoring damaged marine habitats (Blue Carbon).
- are pioneers in implementing sustainability principles in projects through an ecosystem-based approach, **Building with Nature**.

Nevertheless, global competition can be and is distorted by unfair trade practices. Over the past 15 years, European Dredgers have been faced with serious threats from non-EU State-owned Enterprises (SoEs).

The most potent are the Chinese SoEs because they benefit from a battery of government measures that allow them to

- protect their domestic market (*de facto* closed to European Dredgers)
- capture export markets through cheap financing (tied financing schemes close markets)
- capture foreign-financed export markets through heavy subsidies (providing unduly advantageous bids)

Inside Europe, the growing interest and successes of non-EU SoEs in bidding on public procurement tenders and in acquiring strategic assets were progressively tempered after the 2019 awakening of Europe to the threat posed by a global systemic rival.

Despite the complexity and variety of the unfair practices it is faced with, Europe should remain open, further connect with like-minded partners implementing a Level Playing Field, secure its critical entities and further diversify its export and supply markets. However, even in the context of seriously increasing global geopolitical tensions, the **EU's Economic Security Strategy** cannot become a "*fig leaf for protectionism*". A strong European technological and industrial base is also an important part of the strategy.

To do so, Europe should continue to develop its **Global Gateway**, to nurture its trade markets, and its **Strategic Trade Toolbox**, to guarantee level playing field in its domestic market. The **existing rules** in the book should be both used and **enforced**. However, **current and future legislative gaps** should be continuously monitored and filled as the inventiveness of unfair competitors in creating new market distortive measures (hybrid warfare, *de facto* distortions, ...) should never be underestimated. Trade Defence Instruments (TDI)



Alan Lievens  
(Chairman)

Kees van de Graaf jr.  
(Vice Chairman)  
(Dutch Dredging)

Peter van der Linde  
(Treasurer)  
(Boskalis)

Mieke Fordeyn  
(Jan De Nul)

Govert van Oord  
(Van Oord)

Jens Schmidt  
(Hegemann - Dredging)

Éric Tancre  
(DEME)

Andrea Vollebregt  
(Vereniging van  
Waterbouwers)

## 2023 Members of the EuDA Board



for Construction Services may be the most suitable to tackle “*foreign subsidies induced price depression*”. TDI for goods should be enlarged to cover services.

2023 was marked by continued changes in the geopolitical global landscape: after the war in Ukraine, the Middle East is back at war with Israel. Unsurprisingly, EuDA worked on the economic consequences of the geopolitics and focused on the EU’s priorities:

- 1) the trade distortions inside and outside the EU;
- 2) the Green Taxonomy; 3) the EU “Fit for 55”

### Trade Distortions

Trade Distortions can explain how unfit and uncompetitive companies can remain active. The EU has been developing its arsenal of trade measures since 2019. Although a lot of progress has been done (no effective instrument for services), there is still a lot to do. EuDA has been consistently promoting Trade Defence Instruments for the Construction Services because these services deliver tangible outputs (e.g. infrastructures, buildings, ...).

The Foreign Subsidies **Regulation** (FSR) is a welcome step forward to reduce the reverse discrimination of the EU state aid regulations (only applying to the EU Member States and not to all the companies active in the EU). However, the FSR thresholds are far too high and will not cover most of the dredging and construction projects. The *ex officio* procedure is left to the Commission’s own initiative.

### The Green Taxonomy

The Green Taxonomy is providing a common reference system to financial actors for investing more sustainably. The challenge is to capture all economic activities and provide them in an equally fair way with a guidance (technical criteria) to reduce their negative externalities (with a particular focus on the environment) and increase their positive externalities. Because dredging activities have not been properly understood, they have not been given an equally fair chance to demonstrate their capability and significant contribution to most of the climate

change and environmental objectives of this EU legislation.

### The EU “Fit for 55”

The EU “Fit for 55” is an ambitious legislative and policy package aiming to make the EU’s climate, energy, land use, transport and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030. EuDA is actively involved with the Commission services to clarify the implementation of some the maritime “Fit for 55” initiatives to dredging activities. EuDA is a member of the Commission’s expert group providing advice on how to implement the EU Emission Trading Systems to shipping (ESSF ETS-MRV). EuDA prepared a dedicated position paper on how to implement the EU Emissions Trading System (ETS) to dredging to support the implementation process of the EU “Fit for 55”.

With our best regards,

**Kees van de Graaf, Vice-Chairman  
and his colleagues of the Board of EuDA.**



## IN MEMORIAM

### FORMER CHAIRMAN OF BOARD

#### MARC STORDIAU

*The Board of directors of the European Dredging Association learned with great sadness of the passing of Mr Marc Stordiau Former Chairman of the European Dredging Association and former Chief Executive Officer of DEME Group on 2<sup>nd</sup> December 2023.*



Marc Stordiau)

*Marc Stordiau started his career at CFE in 1970, then joined DEME in 1978, where he became CEO in 1991. He became the third Chairman of the European Dredging Association (EuDA) in 2004, when the association was at a turning point, having just celebrated its 10th anniversary in 2003. He restructured the EuDA Board to include more members and become more representative of the membership. Under his leadership, EuDA renewed its impetus and more members regrouped behind its new focus and vision. With Marc Stordiau at its helm, EuDA transformed into a modern European Association, becoming a more prominent and more respected maritime stakeholder towards the European Institutions. In 2015, he decided to step down from the EuDA Board and in December 2023, we learned the sad news that he had passed away peacefully.*

*Marc Stordiau was a prominent figure in the European maritime industries. He will be fondly remembered by many across the maritime spectrum and sorely missed for his vision for the dredging sector, his diplomatic skills and his unwavering sense of humour.*

*On behalf of your former colleagues in the EuDA Board of Directors, we would like to express our sadness at your passing and our gratitude for your dedication and contribution to EuDA for so many years.*

*Thank you, Marc*


*You will always be remembered!*

**Kees van de Graaf,**

Vice-Chairman







## “Dredging is a strategic enabler of Europe’s Blue and Green Economy

### **THANK YOU, Alan**

*Alan Lievens accepted the challenge of chairing the EuDA Board of Directors in 2017. Following the steps of Marc Stordiau, chairman from 2004 till 2015, and Jeanette Rohde, Vice Chairman and acting Chairman in 2016. Under his management and leadership, EuDA continued to increase its visibility and strengthen its relationship with the European Institutions. Moreover, you were a hands-on Chairman as you also chaired one of the most active working groups of EuDA fighting unfair trade practices in Europe and around the world.*

**Alan Lievens**  
(Chairman)



*You have led our Board for nearly 7 years and I would like to personally thank you for your availability, your kindness and your thorough management both diplomatic and clear.*

*You were well respected and appreciated by the Board members.*

*You will be missed for your enthusiasm and well-prepared interventions.*

*On behalf of your colleagues in the EuDA Board of Directors, on behalf of all the Members of the European Dredging Association, I would like to thank you, Alan, for your engagement, reliability and hard work during all these years.*

*Thank you, Alan.*

*We wish you all the best in your new endeavours,*

*Good luck to you and Farewell.*

**Kees van de Graaf,**

Vice-Chairman



**INTERNATIONAL  
MARKETS POLICY**

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**2000-2004 Building of the Palm Jumeirah Island**





**Dubai, UAE**

**August 2001 - February 2004**

**2000-2004**  
capital dredging and construction of  
new Palm Jumeira Island



**Vessels**  
8 TSHDs and 2 CSDs

**Works**  
dredging of 110 Mm<sup>3</sup> of sand,  
11 km breakwater for a total land  
reclamation of 700 ha and 2 km of  
reclaimed beach

**Main Technical Challenge**  
in sensitive environmental  
conditions





## INTERNATIONAL MARKETS

In 2023, EuDA focused its activities on working with the EU Institutions to provide an appropriate European response to unfair trade practices (by non-EU State-owned Enterprises, SoEs), to competition distortions and to market access restrictions around the world.

### Access to the US dredging market

Even before the creation of EuDA in 1993, European Dredgers have repeatedly attempted to open the US market. The US represents a huge market for dredging activities, and it has been closed to foreign competition for over a century (due to the Dredging Act of 1908). In 2013, EuDA gave its full support to the EU Commission during the negotiations of a free trade agreement (FTA) with the US (Transatlantic Trade and Investment Partnership - TTIP). Unfortunately, the political priorities changed in 2017 and TTIP negotiations were stopped. EuDA then progressively reduced its activities on the opening of the US but stands ready to support the EU when the negotiations for a possible FTA with the US restart.



### Risks of Partial Nationalisation in Germany

#### Background

In 2016, the German Federal Government opened a public tender to build a 7,500 m<sup>3</sup> Trailing Suction



Hopper Dredger (TSHD) to support its current TSHD the “Nordsee”, operating in the Jade river. The tender was awarded to Pella Sietas GmbH, a Hambourg-based shipbuilder. The German government’s plan was to have the new State-owned dredging vessel operating in parallel with the “Nordsee” but on the maintenance works of the Elbe river. The works on the Elbe were then (and still are) procured via public tendering processes. The operation of a second TSHD by the German government would result in the **closing of 25% of its maintenance dredging market** and effectively represent a partial nationalisation.

In 2016, EuDA joined forces and worked closely with the Vereinigung der Nassbaggerunternehmen (VdN), the German Association of Dredging Companies. From the start, the strategy prioritised political actions at local level (rather than legal actions).

### Key points of the VdN strategy

VdN highlighted the importance of maritime transport for German trade and economic development, and, in particular, VdN underlined the strategic importance of maritime infrastructures for which dredging activities provide vital services (maintenance, upgrading, expansion). VdN also emphasised the high efficiency and reliability of the highly specialised and capital-

intensive companies carrying out the dredging activities in Germany.

Moreover, the State’s involvement in the economy as economic operator is traditionally targeting strategic infrastructures and ensures that a minimum level of technical know-how is maintained in the administrations for decision-making. VdN reminded that such involvement should be kept to a minimum (and not replace private by public contractors). Therefore, to avoid further closing of the German market, VdN advised the German Shipping Administration to consider keeping **only one hopper dredger in operation** and replace the “Nordsee” when the ordered newbuilt is delivered.

Since 2017, VdN has been building support for this idea from a broad range of German politicians and decision-makers from the national and federal administrations. The general understanding is “*not to approve a budget*

### 2023 Members of the MarCom

The Market Access Committee (MarCom) is a permanent committee established by EuDA to provide the EuDA Board with expert advice on issues inside and outside the EU relating to market access and trade & international affairs, that may significantly impact the European Dredging Industry.



Pierre Potvliege  
(Marcom Chairman,  
EuDA)



to build and operate a second hopper dredger”, which would also conflict with the legal requirement of a 25%/75% share between the public and private fleet for the coverage of navigational dredging in Germany.

### Update on the Issues with the Government's Newbuilding

The TSHD ordered by the German Administration in 2016 has yet to be completed and delivered. After severe delays, Pella Sietas GmbH, the shipyard awarded the construction of the publicly procured dredger, stopped production (+/- 80% completed) in early 2021. Following serious discussions with the authorities, the building works restarted on the commissioned new dredger with a 30% budget overrun. Later in 2021, the Pella Sietas shipyard was declared bankrupt. Finally, in late 2022, an agreement was found to complete the ship at the Blohm & Voss shipyard in Hamburg. The ship is scheduled to be completed by the end of 2024.

### Milestones in delivering the strategy

VdN has achieved key milestones:

- confirming itself as a competent, constructive and reliable partner with **a growing influence on a wide political network in Germany**;
- raising awareness on and obtaining further recognition of the **strategic importance of the dredging sector**;
- having its position (**status quo** in private-public market shares) better understood, better perceived and much more generally accepted;
- establishing an **annual structured dialogue** with the administration in charge of the Waterways and Shipping (*Generaldirektion Wasserstraßen und Schifffahrt- GDWS*) to constructively discuss and ensure, for instance, safe access to Germany's ports;
- joining forces with the **German construction industry** on common positions regarding unfair competition from Chinese SoEs.

At this stage, given the negative experience with this newbuilt dredger, there are no indications that the government will procure a second hopper dredger.

### Overview of activities in 2023

#### New German Government

The German coalition government, comprising the Social Democratic Party, the Greens and the Free Democrat Party, took office in December 2021. The government focused on the greening of shipping and creating a global level playing field. Following the war in Ukraine, the government realised it needed to reduce its dependence on Russian natural gas. Moreover, the government wants to reduce Germany's dependence on China. The Merkel era of “*Wandel durch Handel*” (change through trade) has ended and was replaced by a more pragmatic and reciprocal attitude towards China. In July 2023, the German government published its China Strategy, which entails “de-risking” from China, re-defining the relationship



Alan Lievens  
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Kobbe Peirs  
(Jan De Nul)

David Luty  
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Robert de Bruin  
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(Boskalis)

Paris Sansoglou  
(EuDA)

Silvia Selandari  
(EuDA)







with China to reduce dependencies and ensuring fair market conditions.

### ***German law on monitoring acquisitions***

Following the acquisition of Kuka by a Chinese State-owned Enterprise (SoE) in 2017, Germany revised its legislation to equip its administrations with the legal means to stop unwanted acquisitions (of strategic companies or assets). Very soon after their adoption, Germany used these instruments to stop the acquisitions of 50Hertz in 2018 and of IMST in 2020 by other Chinese SoEs.

Other EU Member States have similar legislations but not all. Europe has made the first step with its Regulation on Foreign Direct Investment (FDI) Screening but still needs to go one crucial step further to include provisions allowing Member States to take concrete action(s) to stop unwanted acquisitions of strategic companies or assets. In January 2024, the Commission proposed to revise the EU FDI Regulation. Even with this review proposal, there will be different foreign direct investment screening regimes in the various EU Member States and no sanctions will be foreseen at the European level.

### ***New Flag and Visa requirements in German public tenders***

Since 2022, German public tenders for dredging projects required the vessels used by the contractors to fly a European flag and to comply with labour and social requirements. In particular, only dredging vessels or equipment registered in the EU and flying a European flag are allowed to execute public tender contracts in Germany. Moreover, to work on a vessel, non-EU workers need a visa entitling them to work in Germany.

These new requirements are making the access to the German dredging market more difficult for non-EU SoEs using mainly non-EU flagged vessels with non-EU staff.

### ***Next Steps***

The German government is expected to pursue its policies on the greening of shipping and on reducing Germany's dependency from Russia and China. In 2024, VdN will continue its proactive outreach campaign to political decision-makers at federal and regional level as well as high-level communication with the Waterways Administration.

### ***Unfair trade practices in Europe by non-EU State-owned Enterprises***



#### ***Background***

Many of the trade practices used by non-EU State-owned Enterprises (SoEs) have the potential to significantly distort competition (with foreign State subsidies). Most of the cases affecting European Dredgers emanate from Chinese State-owned Enterprises (SoEs). For over a decade, EuDA has been actively involved in counteracting or reducing the impact of unfair trade practices by Chinese SoEs worldwide. In a position paper, EuDA described how the Chinese domestic market is de facto closed to European dredgers. EuDA was involved in countering the first case of unfair practices to win a dredging project inside Europe (the Case of Swansea Bay Tidal Lagoon in 2015). Building on these examples as well as on cases of tied financing schemes (that close markets in Africa, South America and Asia), EuDA argued against recognising the Market Economy Status of China in WTO. Since 2018, EuDA is involved in monitoring and, where necessary, reviewing standards for dredging vessels proposed under ISO TC8 WG11 led by China (see chapter on R&D hereafter).



### Sense of urgency

In a November 2018 report, (*The Dutch and Belgian Dredging Industry Exploration of the Future*, Erasmus University), the Rotterdam School of Management identified a significant growth of Chinese dredging SoEs worldwide.

The generalised and systematic use of unfair trade practices over the previous decade has enabled Chinese SoEs to triple their international market share in construction from 7% to 21% globally and to double their market share in Africa from 28% to 56%. These gains were made at the expense of European international construction and dredging contractors, despite their competitive advantage (in terms of technology and know-how). It has also to be mentioned that without cheap Chinese financing, many of these projects would probably not have been financed nor executed for lack of economic sustainability. But when only considering the economically feasible projects, for which European contractors had a fair chance of winning, the damage already caused by these unfair practices to the European Dredgers outside Europe is undeniable, even if difficult to estimate with accuracy. This significant worldwide growth can be explained by the following Chinese policies:

- **protection of the domestic market:** Chinese SoEs execute the vast majority of the projects; the 2020

“dual circulation” policy, confirms that in addition to global trade, China views its domestic market as a possible source of renewed growth for its own companies;

- **capture of Chinese financed export markets:** in the framework of the Belt and Road Initiative (BRI), China finances projects outside China and ties the financing to the exclusive execution by Chinese SoEs; besides tied financing schemes, China also uses political influence, mega-package deals and any other means available to exclude non-Chinese competitors;
- **capture of foreign-financed export markets:** thanks to State subsidies and lower standards, Chinese SoEs can capture projects funded or financed by the EU or the World Bank outside China, when the minimum environmental, ethical and social standards are not effectively enforced by the lending institution;
- **use of market dominance in exposed-captured export markets:** in the third country markets where the presence of Chinese SoEs has grown into a monopoly or an oligopoly (with no meaningful foreign competition), these SoEs can dictate higher prices for projects;
- **acquire strategic assets and strategic companies:** Chinese SoEs acquire strategic companies with the aim of forcing the transfer of key knowledge/technology or to acquire strategic assets with the

aim of gaining more exclusive market access to the detriment of the local/national interests.

### The rapidly turning tide in Europe

As the Chinese SoEs were more and more active in Europe's infrastructure market, Europe had to react and make sure that fair competition and level playing field remain the norm inside Europe.

Since 2019, a core majority of European Member States and politicians realised the ambiguity of the relationship with China, which they described as a “*cooperation partner*”, a “*negotiating partner*”, an “*economic competitor*” as well as a “**systemic rival**”. Europe then adopted a realistic, assertive and multi-faceted Plan of 10 fundamental actions, that included the full use of trade defence instruments and public procurement rules.

The first completed action was the publication in 2019 of the European Commission's “*Guidance on the participation of third country bidders and goods in the EU procurement market*”<sup>2</sup>. This guidance highlighted that, among key functioning principles for public procurement, “Art. 43 of Directive 2014/25/EU does not grant secured access to the EU procurement market to all third country operators”. More





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“Europe has realised that China is not only a cooperation partner, a negotiating partner and an economic competitor but also a systemic rival.”

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specifically, unless a country is a signatory of the WTO Government Procurement Agreement or has signed a Free Trade Agreement with the EU, its **access to the EU public procurement market is not secured** and its companies can be rejected from tenders for this reason only. Romania is the first Member State to have translated this provision into national law which automatically rejects non-complying contractors from its public procurement market.

Europe also took action to equip its procurement market with appropriate instruments to enforce and improve the level playing field. In 2022, the EU adopted the long-awaited International Procurement Instrument (IPI) and the Regulation on “**levelling the playing field as regards foreign subsidies**” (FSR). While the IPI attempts to enforce reciprocal treatment in accessing public procurement markets, the FSR regulation is aiming at preventing foreign subsidies, foreign State ownership and other unfair trade practices from distorting procurement procedures and at ensuring that firms benefit from fair access to both private and public contracts. The FSR regulation empowers the European Commission to take action both in public procurement procedures and in unwanted concentrations. With the FSR regulation, the Commission is recognising the importance of the level

playing field for a well-functioning European Single Market and for Europe’s prosperity. This gives a strong signal on how important EU competition rules, trade defence instruments and public procurement rules are in ensuring fair conditions for companies to work, grow and thrive in the European Single Market.

## Overview of activities in 2023

### Building intelligence

In 2023, EuDA continued to gather and analyse information, experiences and issues with unfair competition from non-EU SoEs that the dredgers and other construction contractors face around the world. The EU has long recognised the pan-European importance of **critical infrastructures**, including energy and transport infrastructures. These infrastructures are priority and strategic assets for Europe and need to be treated as such. EuDA is of the opinion that all major transport infrastructures should be treated as strategic to Europe (meaning their planning, design, financing, construction, operation and acquisition should be monitored and checked against key strategic European criteria).

### Strategic Toolbox of Policies and Instruments

From the scale and wide range of the above-described Chinese practices, it is clear that these cannot be

tackled by a single legislative instrument alone but by a combination of tools covering a wide range of policies: **there is no silver bullet** and a toolbox of trade instruments is the most effective approach.

It is also clear that **the EU needs to continue to diligently fill the gaps and tackle the loopholes in its legislation**. To this end, with the help of its high-level advisor, EuDA developed a comprehensive approach comprising multiple instruments and policies: a European Strategic Trade Toolbox. Since 2018, EuDA has been developing its own strategic toolbox which contains existing instruments or possible new instruments necessary to give an adequate response to these unfair trade practices.

In its **European Strategic Trade Toolbox**, EuDA has identified the following instruments:

- 1° Require Maximum European content in EU-funded projects;
- 2° Generalise use of Commission Guidance on the “participation of third country bidders and goods in the EU procurement market”.
- 3° Enforce Reciprocal Treatment in market access (2022 **International Procurement Instrument**);
- 4° Apply and enforce EU State Aid regulations to all companies working in the EU (including non-EU SoEs; 2022 **Foreign Subsidies Regulation**);

<sup>1</sup> 2019 Joint Communication on “EU-China – A strategic outlook” by the European Commission and the High Representative.

<sup>2</sup> Communication C(2019) 5495



- 5° Apply the Green Taxonomy minimum ethical, environmental and labour safeguards in EU public procurement and all EU-financed projects;
- 6° Establish a Regulation on Trade Defence Instruments for Construction Services;

### **Strong Cooperation and Alliance with the Construction Associations**

Since 2019, EuDA joined forces with the European construction industry associations (FIEC and EIC) and worked jointly on developing EU Trade Defence Instruments for Construction Services (TDI for Construction). In May 2021, EuDA, FIEC, EIC and UNIFE launched a joint website (<https://soes-in-europe.eu/map.php>), to highlight facts and figures showing the increased activity of non-EU SoEs in the European public procurement market in just over 10 years. This neutral online information is meant for European politicians and decision-makers and to raise their awareness of the imminence of the threat and the urgency to take action. The website is regularly updated with new cases.

The discussions with the Commission on new instruments, including a TDI for Construction, were suspended until the International Procurement Instrument (IPI) and the Foreign Subsidies Regulation (FSR) were adopted and enforced. IPI entered into

force and into application in August 2022, while the FSR Regulation entered into application in July 2023.

In July 2023, EuDA-FIEC-EIC launched a joint complaint to trigger an *ex officio* market investigation in the construction industry (including dredging) under the Foreign Subsidies Regulation by the European Commission.

### **Next Steps**

In 2024, the main focus of EuDA will be on following up on the *ex officio* market investigation in the construction industry (including dredging) under the Foreign Subsidies Regulation and promoting a TDI for Construction for the new political cycle (2024-2029).

### **Issues and Lobbying activities in Australia**

#### **Background**

In April 2017, the Australian Government replaced its 457 Visa, the most commonly granted working visas for hiring highly skilled workers, with the Temporary Skill Shortage (TSS) Visa. The Skilled Occupations list accompanying the TSS visas was substantially reduced and created significant concerns for dredging operations as a number of skilled roles, such as Ship's Master, Ship's Officer and Ship's Engineer (previously permitted) are no longer available.



### **Impact on the European dredging companies**

The changes introduced with the TSS have had a significant impact on the ability of the European Dredgers to mobilise and operate dredging and offshore installation vessels to and in Australia as it **denies access of project-critical employees to work in Australia.**

With their highly innovative and technologically advanced vessels, European dredging companies require the presence of fully trained, dedicated and very experienced crew and staff onboard. These critical crew members are employed on a full-time basis and are part and parcel of a sustainable operation system unique to each vessel type and size.

### **EuDA Strategy**

EuDA established a dedicated Task Force on Australia. EuDA's general approach was to provide a strong argumentation on the need to reinstate critical crew (**Ship's Master, Officer and Engineer**) in the needed skills' list and maintain *a healthy balance between locals and expats with regards to the crew on these vessels.* Some of the locally employed and qualified crew is regularly hired to join the already existing long-term expat crew who remain on board in the critical positions. Over the years, this system has been very successful.







## Overview of 2023 Activities

The Federal Visa 400, although limited to a maximum of six months, works well for most of the critical crew involved in dredging projects in Australia. The Temporary Work (Short Stay Specialist) Visa (subclass 400) is a temporary visa that allows skilled applicants to enter Australia and work on a short-term basis (usually less than three months but, in limited cases and in special circumstances, up to six months). This recent easing of the visa procedures reflects a certain shortage of staff in Australia. Therefore, the visa issue for European Dredgers in Australia seems to be solved, for the time being. Therefore the Task Force on Australia was closed.

## Issues and Lobbying activities in India

### Background

Since 2023, European contractors face new barriers to access public tenders in India. Some tender documents from June 2023 foresee, for the first time, an all-Indian arbitration system: the **Society for Affordable Redressal of Disputes – Ports (SAROD – Ports)**. On 10 September 2020, the Indian Union Minister of Shipping, launched “SAROD-Ports” for dispute resolution in the Maritime Sector, comprising of Major Ports, Non-Major Ports and PPP players operating in major ports.



Moreover, some Indian tender documents also foresee a new version of the “Integrity Pact” anti-corruption declaration, which is more far-reaching than the initial version.

### Impact on the European dredging companies

The intention of the new “**SAROD - Ports**” was to reduce the costs of litigations’ resolutions, which is commendable. However, the arbitrators to be appointed for arbitration through the SAROD-Ports process must be chosen from a panel consisting of persons authorised to arbitrate and found in an exhaustive list. As a consequence, all arbitrators will have Indian nationality and a strong link to the Indian administration. This will increase the risk that decisions will become less transparent and biased. If generalised to all tenders (which will be the case), this may significantly affect the market access of foreign contractors to India, because no ‘neutral’ (non-Indian) arbitrator can be nominated. Indeed, the recourse to arbitration procedures are very common practice in India (nearly business as usual).

Moreover, while EuDA supports the Indian’s government focus on appropriate measures to fight against corruption, the combination of the SAROD-

Ports and the requirement to sign the **Integrity Pact** will seriously affect market access in India. This Integrity Pact is far-reaching and contains, for instance, provisions covering extra-territorial activities. This can give too much room for (mis)interpretation and allow measures that can be disproportionate, while significantly increasing the risks for the dredgers. Finally, the wording in the “Integrity Pact” (anti-corruption declaration) is, in some cases, too vague and not specifically drafted for services, and certainly not for construction contractors.

### EuDA Strategy

EuDA’s approach was to analyse the situation and take action to limit the possible negative impact of the combination of the new “SAROD-Ports” arbitration system with the new Indian “Integrity Pact” (anti-corruption declaration) for European dredgers. Then, EuDA raised the awareness of the European Commission and selected national administrations on the issues. EuDA prepared possible amendments to these documents to make them more practical for the dredging projects.



### Conference Overview

#### Blue Economic Actors and Assets, Critical to deliver Europe's Open Strategic Autonomy

Following the global confinement due to the COVID pandemic and subsequently the war in Ukraine, Europe faced in a three-year period major disruptions of its supply chains and realised that many sectors of its economy, including the strategic ones, were too dependent on only few supplying nations, which do not necessarily share Europe's core values. To sustain its economic growth, Europe needs to safeguard its supply chains, in particular, its most strategic transport assets as well as accesses to resources and markets, by further expanding its geopolitical diversification.

Within the strategic assets and cornerstones of Europe's global supply chain, waterborne transport infrastructures play a critical role. This was widely and repeatedly recognised during the recent crises. Therefore, with its Open Global Gateway, Europe intends to reinvigorate and secure its main multimodal trade routes, hubs and flows. Europe still has a global competitive advantage in building, operating and maintaining waterborne transport infrastructures. However, over the past decade, this European leadership has been progressively weakened and is now even under threat by the relentless and

determined use of unfair trade practices from systemic rivals of the EU.

State-owned Enterprises (SoEs) are the spearheading instruments used by some non-EU nations to fulfil their economic and geopolitical ambitions. This 'aggressive' use of economic power and resources to deliberately weaken and progressively eliminate competition in targeted markets is also known as hybrid warfare. When a stage of significant economic dependence is reached, the level of influence of the suppliers' country is increased accordingly in the area.

In 2019, Europe realised that its relationship with China was multifaceted:

*"China is, simultaneously, in different policy areas, a cooperation partner [...], a negotiating partner [...], an economic competitor [...], and a systemic rival [...]."*

*The tools and modalities of EU engagement with China should also be differentiated [...]."*

When addressing unfair trade practices, there is no silver bullet and the only effective approach for Europe is through a strategic toolbox of "differentiated" but complementary trade instruments. Since 2019, Europe has built new legislative instruments and equipped itself

with trade tools to defend its internal market and its industries against the toxic effects of these practices.

During EuDA's 30<sup>th</sup> Anniversary Conference, representatives from the European Commission, Academia and Industry presented their views on these multipronged threats to Europe, the possible opportunities as well as the corresponding EU initiatives to adequately tackle them: Economic Security, Foreign Subsidies Regulation and the Open Global Gateway. They will exchange their views on their respective strategies and the way to fill the remaining gaps. The floor was also opened for meaningful exchanges with the audience.

<sup>1</sup> EU-China Strategic Outlook: Commission and HR/VP contribution to the European Council (21-22 March 2019).



**EuDA's 30<sup>th</sup> Anniversary Conference**  
**Blue Economic Actors and Assets, Critical to**  
**deliver Europe's Open Strategic Autonomy**

■ **Welcome and Opening**

**Mr Kees van de Graaf**, EuDA Vice-Chairman

■ **Introduction to the Conference Theme and Speakers**

**Ms Eleonora Catella**, BusinessEurope Deputy Director for International Relations, *Conference Moderator*

■ **Trade Aspects of Europe's Open Strategic Autonomy**

**Mr Denis Redonnet**, European Commission, Deputy Director General for Trade, European Chief Trade Enforcement Officer

■ **Concept of Economic Security**

**Prof. Dr Cind Du Bois**, Royal Belgian Military Academy, Head of the Chair of Economics

■ **EU Strategy on Foreign Subsidies Regulation (FSR)**

**Ms Silvia Selandari**, European Dredging Association, Director for Trade Affairs

■ **EU's Global Gateway**

**Mr Lénaïc Georgelin**, European Commission, DG INTPA Sustainable Transport and Urban Development

■ **European Dredgers' Challenges Inside and Outside Europe**

**Mr Paris Sansoglou**, European Dredging Association, Secretary General

■ **Way Forward for the Construction Contractors**

**Mr Karel De Gucht**, Former European Commissioner for Trade

■ **Open Discussion and Conclusions**

**Conference's key messages:**

- Despite the complexity and variety of the unfair practices it is faced with, Europe should remain open, further connect with like-minded partners implementing Level Playing Field, secure its critical entities and further diversify its export and supply markets. However, the **EU's Economic Security Strategy** cannot become a "*fig leaf for protectionism*". A strong European technological and industrial base is also an important part of the strategy.
- To do so, Europe should continue to develop its **Global Gateway** and its **Strategic Trade Toolbox**, to nurture its trade markets and guarantee a level playing field in its domestic market. **Current and future legislative gaps** should be continuously monitored and filled as the inventiveness of unfair competitors in creating new market distortive measures (hybrid warfare, *de facto* distortions, ...) should never be underestimated. We need to stay alert, as Europe's Strategic Trade Toolbox is not and cannot be ever expanding. The **existing rules** in the book should be both used and enforced.
- Major progress was achieved as unfair bids seem to be less successful in recent years. However, **Europe still needs more effective and comprehensive Trade Disciplining Instruments for its strategic sectors,**

**such as Services**. The Commission Staff Working Document on China and Russia regarding the TDI for goods should be enlarged to cover services. Moreover, Trade Defence Instruments for Construction Services may be the most suitable to tackle "*foreign subsidies induced price depression*".

- The **Global Gateway can be the right EU answer** to some of these issues however, the EU should clearly determine its ambitions with the Global Gateway and make sure it has the means to its end: "*Show me the money!*".
- **Dredging is a strategic enabler of Europe's Blue and Green Economy:** the unique knowledge and expertise of its dredgers allows Europe to remain open and connected with its global supply and export markets.

**More detailed Key Messages from the EuDA's Annual Conference are available on**  
<https://www.european-dredging.eu/Events>.



## PARTICIPANTS AND GUESTS AT THE EUDA 2023 ANNUAL CONFERENCE

Organised every November in Brussels, EuDA's annual conference gathers eminent representatives from the industry, the European and national administrations as well as other key stakeholders.

The theme of the 2023 EuDA Conference was “Blue Economic Actors and Assets, Critical to deliver Europe’s Open Strategic Autonomy”.









**THANK YOU, Pierre!**

*Pierre Potvliege joined the EuDA Market Access Committee (MarCom) in 2020 at its creation. He had chaired the EuDA Task Group on Indian Market Access in 2011 that had successfully obtained the removal of unjustified (and discriminatory) countervailing duties on non-Indian flagged dredgers.*

*Pierre focused the MarCom activities on the most urgent trade issues mainly regarding the unfair trade practices by the Chinese State-owned Enterprises around the world and their negative impact on the dredging and construction contractors. After starting the MarCom up and chairing it for 4 years, we appreciated your dedication to the industry, your keen work and enthusiasm. We wish you all the best in your new endeavours and welcome your successor Mr Robert de Bruin.*

*Thank you, Pierre! Good luck and all the best.*

**Kees van de Graaf**, Vice-Chairman



**Pierre Potvliege**  
(Marcom Chairman,  
EuDA)

**THANK YOU, Alan!**

*Alan Lievens reinforced EuDA's trade activities and lead a working group dedicated to improving level playing field since 2018. As Chairman of EuDA, Alan Lievens oversaw the restructuring of EuDA's trade activities and was instrumental in the creation of the EuDA Market Access Committee, monitoring trade activities and fighting unfair trade practices in Europe and around the world.*

*You have coordinated and personally engaged in EuDA's lobbying activities on trade for nearly 6 years! And I would like to personally thank you for your availability, your kindness and your thorough management both diplomatic and clear! You will be missed for your*

**THANK YOU TO TASK FORCE ON LEVEL PLAYING FIELD IN TRADE**

*On behalf of the EuDA Board we would like to thank the members of the Task Force working on levelling the playing field in trade for their excellent work since 2018! You have identified unfair trade practices and helped the Board define a EuDA strategy to find a way forward to protect*

*the European dredging market from trade distortions. Following your work, EuDA adopted the Strategic Toolbox Approach and identified proper existing tools and possibly missing ones. Now this task has been taken over by the Market Access Committee.*

*Thank you for your well-appreciated work and strong support to the European dredging industry,*

**Kees van de Graaf**, Vice-Chairman

**2023 Members of the TF on Level Playing Field in Trade**



**Alan Lievens**  
(EuDA Chairman)



**Hans Mooij**  
(Boskalis)



**Yves Cornardt**  
(DEME)



**Kobbe Peirs**  
(Jan De Nul)



**David Luttj**  
(Jan De Nul)



**Robert de Bruin**  
(Van Oord)



**Robert Middelhoek**  
(Van Oord)



**Robert Poelhekke**  
(NABU)



**Pierre Potvliege**  
(EuDA)



enthusiasm and well-prepared interventions.

On behalf of the EuDA Board and your colleagues in the Market Access Committee, I would like to thank you, Alan, for your engagement, hard work and reliability during all these years!

Thank you, Alan! We wish you all the best in your new endeavours, Good luck to you and Farewell Sailor!

**Paris Sansoglou**, Secretary General



**Alan Lievens**  
(EuDA Chairman)



**David Luty**  
(Jan De Nul)

#### **THANK YOU, David!**

David Luty joined EuDA's trade activities in 2016 and reinforced a working group dedicated to opening the US dredging market. With his experience and network of diplomatic contacts, he was a key member of a team of experts who had very different but complementary backgrounds.

Following a change in his career path, David had to give up his seat in the MarCom. We appreciated, David, your enthusiasm, your valuable contributions and clear points.

On behalf of the EuDA MarCom colleagues, we would like to take this opportunity to thank you, David, for your commitment to our various trade working groups and for the time and advice you gave us with regards to market access issues affecting the European dredgers around the world.

We wish you all the best in your new endeavours. Good luck to you and Farewell Sailor! Thank you, David.

**Paris Sansoglou**, Secretary General

#### **THANK YOU TO TASK FORCE ON AUSTRALIA**

On behalf of the EuDA Board we would like to thank the members of the Task Force on Australia for their excellent work since 2018!

You have helped the Board understand the market access issues in Australia and define a EuDA strategy to

find a way forward to keep the market open. Following your engagement with the Australian authorities, the situation of the working visas has significantly improved for the critical crew involved in dredging projects in Australia and is workable.

Thank you for your perseverance and help to the European dredging industry,

**Kees van de Graaf**, Vice-Chairman

#### **2023 members of the TG AUS**



**Paul Janssens**  
(Chairman, Jan De Nul)



**Peter Boere**  
(Boskalis)



**Erwin Deserranno**  
(DEME)



**Guus de Vries**  
(Van Oord)

#### **EuDA members of both TF's were:**



**Paris Sansoglou**  
(EuDA)



**Silvia Selandari**  
(EuDA)



**ENVIRONMENTAL  
POLICY**

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2008-2010 Port of Melbourne channel deepening





## Port of Melbourne Australia

February 2008 - November 2009

**2008-2010**  
channel deepening of Port  
of Melbourne (in sensitive  
environmental conditions), Australia



**Vessels**  
2 TSHDs and 1 Grab Dredger

**Works**  
dredging of 22 Mm<sup>3</sup> of sand,  
fine silt and rocky material to  
deepen the entrance channel from  
14 m to 17.3 m

**Main Technical Challenge**  
specialised dredging techniques  
and equipment were required to  
execute the dredging activities in an  
environmentally sensitive area





## 1. European Green Deal

### Background

Adopted in December 2019, the European Green Deal is the EU's overarching legislative and policy framework designed to improve Europe's environmental footprint as well as to fuel its economic growth and to improve its social and working conditions. The Green Deal is the EU's top priority and its main objectives include: no net emissions of greenhouse gases by 2050 (EU commitments under the Paris Agreement), decoupling of economic growth from resource use, and a transition just and inclusive for all (no person and no place is left behind). Although very ambitious, these objectives can be achieved, but require a strong cooperation between policy-makers and stakeholders.

## 2. The European Green Deal's Sustainable Finance and Green Taxonomy

Among the many initiatives taken by the Commission under the Green Deal, there are two initiatives that will have a potentially significant impact on the European industry and economy: **Sustainable Finance and the Green Taxonomy**.

### Sustainable Finance

**Sustainable Finance** is about financing the European Green Deal (refocus and channel the financial flows towards activities making a significant contribution towards the Green Deal's objectives) and about increasing the financial resilience of the economy, the companies and the citizens.

The European Green Deal needs to be financed and the transition to a sustainable economy will need to be incentivised, because significant investment efforts will be required from all sectors of the economy. Both public and private financing frameworks must support these efforts to reach the 2030 climate and energy targets. Moreover, financial sustainability is also part of the challenge and particularly the increase of the financial resilience of the economy, companies and citizens. Sustainable investments will need an enabling framework, the **Green Taxonomy**, with appropriate tools and structures, to promote the "*financing of green activities*" and the "*greening of finance*".

### Green Taxonomy

The **Green Taxonomy**<sup>1</sup>, published in June 2020, was designed to identify (more) sustainable practices and incentivise them through sustainable financing in order to achieve the environmental objectives of the Green Deal. To this end, it established criteria for determining whether an economic activity qualifies as environmentally sustainable and to establish to what degree an investment in such activity is environmentally sustainable.

The Green Taxonomy regulation initially only covered climate change objectives (mitigation and adaptation) and was based on the work concluded by the Technical Expert Group (TEG) in 2020. It is designed as a series of legislative texts that will progressively encompass all economic activities and environmental objectives. These legislative pieces also cover the 4 additional environmental objectives (combatting pollution, promoting a circular economy, preserving and restoring biodiversity and improving water quality) based on the work concluded by the Platform for Sustainable Finance (PSF) in 2022 (*TWG Report* and *TWG Supplementary Report*, corresponding to roughly 2 annual batches of work on TSCs).

<sup>1</sup> Regulation 2020/852 on the "establishment of a framework to facilitate sustainable investment".



## 2023 Members of the EuDA EnvironmentCommittee

The Environment Committee (EnvCom) is a permanent committee established by EuDA to provide its Board with expert advice on issues with environmental legislation faced by the members inside the EU, which can have a significant impact on the European Dredging Industry.



Pieter van der Klis  
(EnvCom Chairman,  
Van Oord)



Arjan Schrijen  
(Boskalis)



Karel Allaert  
(Jan De Nul)



Paul Vercrujssse  
(DEME)



Coert Begemann  
(DD-DB)



Mark Russell  
(BMAPA)



Michiel Spitzer  
(Vereniging van  
Waterbouwers)



Paris Sansoglou  
(EuDA)



Silvia Selandari  
(EuDA)

A new Platform on Sustainable Finance (PSF 2.0) was established in 2023 and kicked off on 08/03/2023. Regrettably, EuDA's membership to the PSF was not reconducted in PSF 2.0 and neither were its partners' (FIEC, World Green Building Council). The PSF 2.0 has kept a similar structure but has less members and has shifted its priorities from the Technical Working Group towards **data availability and applicability**.

### Developments regarding Dredging Activities

In April 2023, the Commission published proposed Delegated Acts (DA) and organised a consultation to gather feedback from stakeholders. Where the proposed changes under waterborne infrastructures (6.16) in the DA aligned the scope of Climate Change Mitigation (CCM) with the one of the Climate Change Adaptation

(CCA). However, this proposed alignment is worsening the situation for dredging as they propose to also exclude, without any criteria for Substantial Contribution (SC) and for Do Not Significant Harm (DNSH), dredging of waterways from the scope of CCM (6.16).

In its response to the consultation, EuDA recommended that:

- the construction, modernisation and maintenance of infrastructure enabling low carbon water transport should include dredging activities, including maintenance (with clear Technical Screening Criteria (TSCs) for SC and DNSH);
- the construction, modernisation and maintenance of adapted waterborne transport infrastructure should also include dredging activities.

EuDA also suggested to consider **dredging activities as enabling activities** for infrastructures and recommended to the Commission to establish a dedicated Sector Team to develop ad hoc TSCs for dredging as an enabler for Adaptation and as an enabler for Mitigation.

In July 2023, EuDA sent a letter to the four Commission Directors General of respectively DG FISMA, DG ENV, DG CLIMA and DG MOVE, asking for a **clarification** of the treatment of dredgers (more specifically the "exclusion of dredging of waterways" in climate change adaptation and mitigation from the Regulation on Green Taxonomy). EuDA highlighted the fact that such an exclusion is **discriminatory** as dredgers don't have any requirements/criteria to comply with.



The Commission understood EuDA's points and informed that DG FISMA are engaging more and more with stakeholders outside the Platform for Sustainable Finance (PSF 2.0). Amongst other, they opened in October 2023 an on-line "**Stakeholder Request Mechanism**" to collect input to improve current and future legislation.

EuDA requested in December 2023 and argued for the removal of the text "*excluding dredging of waterways*" from the scope of the Climate Change Adaptation (CCA) and Climate Change Mitigation (CCM).

The Commission has confirmed that it considers dredging as an enabler for the adaptation of the waterborne infrastructure (the activity being the (adapted) operations of the infrastructure).

**Enabling activities** are defined in Art. 16 of the Taxonomy Regulation as follows:

*"An economic activity shall qualify as contributing substantially to one or more of the environmental objectives set out in Art. 9 by directly enabling other activities to make a substantial contribution to one or more of those objectives, provided that such economic activity:*

*(a) does not lead to a lock-in of assets that undermine long-term environmental goals, considering the economic lifetime of those assets; and*

*(b) has a substantial positive environmental impact, on the basis of life-cycle considerations."*

Therefore, considering that **dredging activities are enabling activities** for infrastructures, the Commission should establish a dedicated Sector Team to develop ad hoc Technical Screening Criteria (TSCs) for dredging as an enabler for Adaptation and as an enabler for Mitigation.

#### **The Blue Dot Network**

At the initiative of Australia, Japan, the United Kingdom and the United States, a Blue Dot Network (BDN) supported by the OECD was established. The BDN is a voluntary private-sector-focused and government-supported certification scheme, based

on quality infrastructure standards on business conduct, sustainable infrastructure finance and good infrastructure governance as set out in the G20 Principles for Quality Infrastructure Investment, the G7 Charlevoix Commitment on Innovative Financing for Development, the Equator Principles and guidelines such as the OECD Guidelines for Multinational Enterprises. The OECD is coordinating technical support to develop and operationalise this quality infrastructure certification framework.

The BDN aims at tackling the **USD 2.5-3.5 trillion investment gap**, at fostering **investments in quality infrastructure** and at providing an **internationally-recognised certification framework** to assist countries in pursuing investments in infrastructure that support sustainable growth and resilient economic recovery and maximise the positive economic, social, environmental and development impact.

The BDN is involving external industry stakeholders like EuDA, in its Executive Consultation Group and in technical Working Groups, including:

1. investment efficiency and outcomes
2. environmental and social considerations
3. transparency and integrity





In 2022, EuDA became a member of BDN's Executive Consultation Group and joined the BDN Working Group 2 on Environmental and social considerations.

### 3. The European Green Deal Industrial Plan

In February 2023, the Commission published its EU Green Deal Industrial Plan. This Plan intends to enhance the competitiveness of Europe's net-zero industry and support the fast transition to climate neutrality. This EU Plan is based on four pillars:

#### I. A predictable and simplified regulatory environment

The Commission will propose a **Net-Zero Industry Act** and a **Critical Raw Materials Act**.

#### II. Faster access to funding

This pillar of the plan intends to speed up investment and financing for clean tech production in Europe. Public financing, in conjunction with further progress on the European Capital Markets Union, can unlock the huge amounts of private financing required for the green transition through the **Temporary State aid Crisis and Transition Framework**.

#### III. Enhancing skills

The Commission will propose to establish **Net-Zero**



**Industry Academies** to roll out up-skilling and re-skilling programmes in strategic industries.

#### IV. Open trade for resilient supply chains

This last pillar is about global cooperation and making trade work for the green transition, under the principles of fair competition and open trade.

#### 4. The European Green Deal's 'Fit for 55' package

##### Background

Adopted on 14/07/2021, the '**Fit for 55**' package consists of a set of inter-connected and complementary policy initiatives and legislative proposals on climate, energy (fuels), transport, buildings (heating), land use (forestry) and taxation (trade). This major policy and legislation package drives towards achieving a net reduction of greenhouse gas emissions by at least **55% by 2030**, compared to 1990 levels, and ensuring a fair, competitive European industry, by applying the '*Polluter-Pays*' principle. Where possible existing legislation was reviewed and made more ambitious. Where needed new proposals were prepared and implemented.

Out of the 13 'Fit for 55' instruments, EuDA focused on:

- Extending **EU ETS to shipping**;
- Updated **Energy Taxation Directive** (the systematic taxation may improve the level playing field, where it used to be voluntary among Member States);
- **FuelEU** (Cleaner maritime fuels) will promote sustainable maritime fuels and create new requirements for ships, regardless of their flag, arriving to or departing from EU ports, by imposing a maximum limit on the greenhouse gas content of the energy they use and making these limits more stringent over time.

##### Extension of ETS to Maritime

With specific regard to the EU Emission Trading System (ETS), the same key principles and constraints that apply to the other ETS sectors will apply to maritime: shipping companies will have to

- **monitor** their emissions,
- **purchase** and
- **surrender ETS emission allowances** for each tonne of reported greenhouse gas (GHG) emissions.

In the latest version of the ETS extension to shipping, the following points can be highlighted:

- **phase-in period** for general cargo and passenger shipping of more than 5000 GT;
- as from 2025, the EU MRV will cover general cargo ships and offshore vessels over 400 GT;

##### Main question

There is no definition of dredging vessels nor offshore vessels in the European law.

So What is understood under "Offshore vessels" and does that understanding include dredging vessels?

- as from 2024, the EU MRV will cover **methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O)** (coverage by the EU ETS as from 2026);
- ships' emissions should be cut by 2% as of 2025 and by 80% as of 2050.



EuDA updated its ETS Position Paper and clarified that:

1. The **vessel approach for ETS** should be applied to **dredging** and related activities.
2. EuDA recommends pursuing the **constructive dialogue** between administrations and the dredging sector to identify the relevant metrics and approaches to improve energy efficiency and reduce CO<sub>2</sub> emissions.
3. The **zero-emissions target** should be the main focus for political action. From a technological point of view, future progress on reducing GHG emissions should come from a step change innovation (sustainably produced carbon-free fuel).
4. Until carbon-free fuels or net-zero emission technologies are widely available, **absolute reduction of CO<sub>2</sub> emissions cannot be disconnected from the global economic activity**.
5. The **project** provides an appropriate frame for optimising the consumption of the necessary energy and resources as well as for improving its overall **sustainability**.
6. By aligning **public procurement requirements** with the Green Deal's objectives (**Green Taxonomy aligned**), the 'demand pull' for green projects could be significantly leveraged with the public clients and accelerate the green transition.
7. the **dredging's own effort amounted to 13% improvement** and the rest (from 20% to 27%) resulted from the evolution of economic variables (incl. demand) outside the control of the dredgers.

FOOTNOTE: The EuDA Emissions' Strategy is covered in chapter 4 of this document.

“Public clients can significantly leverage the demand for green projects and accelerate the green transition.”

#### FuelEU Maritime Regulation

Today, the **maritime fuel mix** is composed of over **99% of fossil fuels**. To reach the climate targets in 2050, the maritime sector should transition towards close to 90% use of renewable and low-carbon fuels.

Unfortunately, to date, there is not a single technological option for the large variety of ship types and trades. Therefore, many operators are trapped in

a “**wait-and-see attitude**”, while pioneers invest in a selection of promising technologies.

There is a **need for considering the** total cost of ownership (lifecycle approach-LCA) and for coordination between supply, distribution and demand. To break the chicken-and-egg issue, 'Fit for 55' is addressing all relevant aspects from **fuel production** (Renewable Energy Directive), **fuel distribution** (Alternative Fuel Infrastructure Directive) and **fuel demand** (FuelEU).

The FuelEU Maritime Regulation targets the **demand** of renewable or low carbon fuels and specifically addresses the technology issue related to these fuels. **Obligations must be imposed on demand** not only to promote investments in supply and distribution, but also to **avoid carbon leakage**. Consistency with green financing (**Green Taxonomy**) is also of the essence.

#### 4. Habitats and Biodiversity

The Birds and Habitats Directives are the cornerstones of Europe's nature conservation policy. They are built around two pillars:

- Natura 2000 network of protected sites;
- System of species protection.



Because of the potential conflicts between transport and environmental policy objectives, the implementation of infrastructure projects such as dredging, often suffers from significant delays, uncertainties or even blockage. EuDA encourages joint working groups and approaches on (joint) policy implementation like the ones DG MOVE and DG ENV organised on the implementation of the Habitats Directive in Coastal, Estuary and River environments (*"The implementation of the Birds and Habitats Directives in estuaries and coastal zones, with particular attention to port development and dredging"* and *"Inland waterway transport and Natura 2000: Sustainable inland waterway development and management in the context of the EU Birds and Habitats Directives"*). In these guidelines, for instance, (maintenance) dredging is referred to as a measure that could be designed in such a way as to achieve or respect both environmental and navigational objectives.

Moreover, EuDA is of the opinion that **net biodiversity gains** should be encouraged in projects, including in the case of compensations, not discouraged.

### Biodiversity Strategy for 2030

A core part of the European Green Deal, the EU's Biodiversity Strategy for 2030 is a comprehensive, ambitious and long-term plan to protect nature and reverse the degradation of ecosystems. The strategy aims to put Europe's biodiversity on a path to recovery by 2030 and contains specific actions and commitments. It is the proposal for the EU's contribution to the upcoming international negotiations on the global post-2020 biodiversity framework.

**Biodiversity** is the variety of life on Earth, including plants, animals, fungi, micro-organisms, and the habitats in which they live. This web of living things forms the ecosystems that underpin all economies and societies.

### 5. The Waste Framework Directive

*"In the majority of cases, **dredged material is not a waste** but a resource to put to beneficial use"*. Although effective, this situation is not sufficiently known nor recognised by the policy makers and legislators across Europe.

At EU level, EuDA's campaign convinced the Commission to remove dredged sediments from the scope of the 2008 revised 'Waste Framework Directive' (WFD) (unless proven hazardous). The European Directives,

though, are not immediately law (like the European Regulations) but need to be transposed into national legislation. Therefore, EuDA's approach involved the EU Member States. There is a significant difference in the implementation of the Waste Framework Directive into the Member States' national legislations. As it appears there is some sort of divide between some Northern and some Southern EU countries.

The concept of 'Circular economy' was progressively elaborated by the European Commission to stimulate the re-use/re-cycling of waste with the general motto that *"waste is a resource to be put to beneficial use"*.

### 6. Water & Marine Strategy Framework Directives

The Water and Marine Strategy Framework Directives are the cornerstones of Europe's water policy. They are built around the following concepts:

- River basin management (cross-border);
- Good Ecological Status (water quality);
- Good Environmental Status (including human activities).

The main objectives of these European legislations are the protection of all waters (surface, ground) as well as the marine environment across Europe. To achieve these objectives, they used the so called



“combined approach” of emission limit values and quality standards. The Marine Framework Directive is the more recent of the two and the timeline of its first loop includes: the completion of the Member States’ respective monitoring programmes in 2014, then their programmes of measures in 2015 with the ultimate goal of achieving the Good Environmental Status (GES) in 2020. Although significant progress was made among the Member States, more time is needed to achieve complete GES.

The Marine Strategy Framework Directive (**MSFD**) aims at “filling the gaps” left by the Water Framework Directive: for instance, the geographical scale is not restricted anymore to the coastal waters. Moreover, MSFD broadens the scope of water quality assessment by enlarging the “Good Ecological Status” (mainly chemical assessment of the water quality) to the “Good Environmental Status” (**GES**), introducing the human activities’ impacts on water quality and ecosystems.

Compared to the Water Framework Directive, the Marine Framework Directive introduced:

- the selection and implementation of the Measures (Descriptors), their Monitoring and adaptive Management;
- the integration and further development of the Shipping activities;
- a clarification of the handling of contaminated/ uncontaminated sediments.

Under the Integrated Maritime Policy, the Maritime Spatial Planning and Integrated Coastal Management present the main policy elements of Europe’s coastal management.

With 80% of the largest population centres located in coastal areas, this new policy is a response to the increased demand for use of the coasts and the seas.

The main issues for dredging remain the need to access ‘winning areas’ and/or ‘relocation areas’ (sand, rock, gravel, silt ...). Besides, Member States need a common framework but also flexibility (in space, time and policy) for implementation.

**THANK YOU, Coert!**

*On behalf of the EuDA Environment Committee, I would like to thank you, Coert, for your excellent work and your cooperation with the dredging industry.*



Coert Begemann  
(DD-DB)

*You joined us in the EuDA EnvCom in 2021 and we appreciated your dedication and time spent for EuDA on environmental issues and legislation affecting the European dredgers.*

*We wish you all the best in your new endeavour and welcome your successor Mr Harold Slump.*

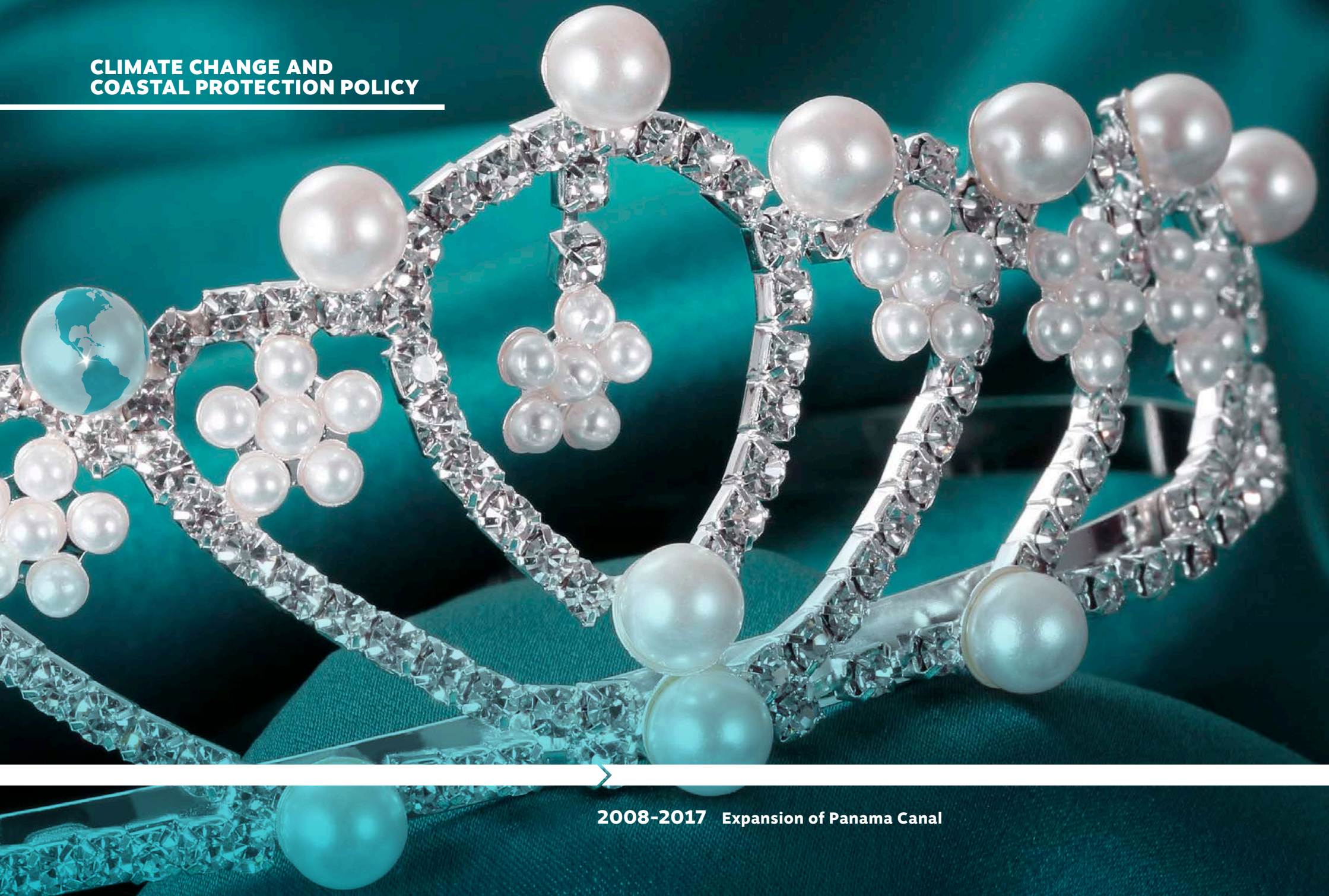
*Thank you, Coert,  
for your dedication and support to our industry,*

*Farewell!*

**Pieter van der Klis**  
EnvCom Chairman



**CLIMATE CHANGE AND  
COASTAL PROTECTION POLICY**



**2008-2017** Expansion of Panama Canal





**Panama**

**April 2008 - August 2017**

**2008-2017**

capital dredging and construction of new locks, for the creation of the new Panama Canal, Panama



**Vessels**

2 TSHDs, 4 CSDs and 2 BHDs

**Works**

dredging of 40 Mm<sup>3</sup> of sand and 10 Mm<sup>3</sup> of rock (basalt) for a total deepening of 16,3 m on a length of 81 km and for installing new locks

**Main Technical Challenge**

the significant volume and size of the project





## CLIMATE CHANGE AND COASTAL PROTECTION

From its inception in 2009, the EuDA **Emissions Working Group** (EmWG) worked towards establishing and implementing the EuDA common **CO<sub>2</sub> Strategy**. The main objectives of the CO<sub>2</sub> Strategy have been to improve EuDA's internal understanding over its dredging fleet's CO<sub>2</sub> emissions and to improve EuDA's external communication towards public administrations and relevant stakeholders. Besides CO<sub>2</sub> emissions, the scope of this working group also covers the other emissions from dredging vessels since 2017.

With the consistent promotion of its CO<sub>2</sub> Strategy, through position papers, consultations, presentations, specialised articles, meetings, EuDA managed to raise the awareness of officials and representatives from the European Commission, the European Council (through the Member States) as well as from IMO on the views

and main recommendations of the European Dredgers with regards to CO<sub>2</sub> matters.

In 2023, EuDA continued the implementation of its CO<sub>2</sub> Strategy and focused on the 'Fit for 55' legislative package (part of the Green Deal), including the extension of the Emission Trading System to shipping and the FuelEU to maritime, the European Sustainable Shipping Forum (ESSF), on the IMO Data Collection System and the EU's Directive on Monitoring, Reporting and Verification. EuDA prepared a Position Paper on how to implement ETS to dredging vessels.

With regard to its CO<sub>2</sub> Strategy, EuDA has consistently raised concerns over the need to clarify the language used in the Delegated Acts of the Green Taxonomy Regulation (see above Chapter 3), where 'dredging of waterways' is excluded from the scope of the

taxonomy regarding a substantial contribution to climate change mitigation and adaptation (Annexes I & II, 6.16 waterborne infrastructures). Dredging activities are enabling offshore renewable energy activities and they are also indispensable for the adaptation of waterborne infrastructures to climate change. European Dredgers can also build protection against sea level rise as well as coastal and flood defences to protect populations or economic assets from their exposure to extreme events.

### EuDA CO<sub>2</sub> Strategy

The main objective of the CO<sub>2</sub> Strategy has been to build a better understanding over the CO<sub>2</sub> emissions from the EuDA dredging fleet. From the start, EuDA established a procedure and methodology for the collection of raw data for the calculation of CO<sub>2</sub> emissions. When necessary, the Strategy can also raise

### 2023 Members of the EuDA Emissions Working Group



Paul Vercuijsse  
(EmWG Chairman  
DEME)



Arjan Schrijen  
(Boskalis)



Liesbeth den Haan  
(Van Oord)



Linda Behage  
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Karel Allaert  
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Michiel Spitzer  
(Vereniging van  
Waterbouwers)



Coert Begeman  
(DD-DB)



René Kolman  
(IADC)



Paris Sansoglou  
(EuDA)



Silvia Selandari  
(EuDA)



awareness at the International Maritime Organization (IMO).

### Industry-backed calculation method for CO<sub>2</sub>

The implementation of the EuDA CO<sub>2</sub> Strategy required the gathering of information, the building of internal knowledge and the formulation of specific messages to effectively communicate our issues and their possible solutions to the relevant parties. Besides the contacts within the Member States, EuDA has kept regular contact with the Commission's DG CLIMA informing the Officials and making them aware of the specific situation of the dredgers.

In 2010, EuDA prepared a dedicated report in which it compiled a set of fact-based emission figures for its dredging fleet, established a transparent industry backed calculation method and analysed in detail

“Fact-based information is crucial to legislators to make informed decisions.”

EuDA fleet's emissions. In 2019, EuDA updated its fleet emissions' report for the 103 Trailing Suction Hopper Dredgers (TSHD), 63 Cutter Suction Dredgers (CSD) and 30 Backhoe Dredgers (BHD) (based on data from 2017). This second report confirmed that the calculation methods remained unchanged and that the average performances of the vessels in the dataset had improved by 15% over 20 years. Based on this report's findings, EuDA prepared a policy paper on the '*Decarbonisation of the Dredging Sector*' and technical reports to communicate externally.

### EuDA CO<sub>2</sub> emission figures 2022

As part of the EuDA CO<sub>2</sub> Strategy, EuDA has been collecting data for the CO<sub>2</sub> emissions of the European dredging fleet since 2008. Since well before the 2015 Paris Agreement and the EU Green Deal commitments on GHG emissions, EuDA members have been actively searching for ways to reduce their atmospheric emissions and optimise fuel consumption as well as researching alternative options to fossil fuels.

EuDA members took individual steps, testing pilot initiatives (LNG propulsion, biofuels and “fumes treatment”) to lower not only the CO<sub>2</sub> emissions but also NOX, CO and fine particles. They also took joint steps through EuDA by organising strategic workshops

on energy transition towards a neutral carbon footprint and on the implementation of ETS to dredging.

### Overview of the main drivers for the dredging and related activities

The main drivers for the European dredging companies are diverse and include activities such as capital and maintenance dredging, offshore energy projects as well as urban, tourism and coastal projects. Because these drivers are not correlated with each other, the dredging sector is characterised by a certain level of **acyclicality** (or a resilience to economic cycles) that translates into a reasonably steady growth.

For instance, in 2022, while capital and offshore energy dredging projects continued to decline, urban and tourism related projects have been picking up for the last two years. However, maintenance projects, have been relatively stable during the past decade but continued to decrease slightly.

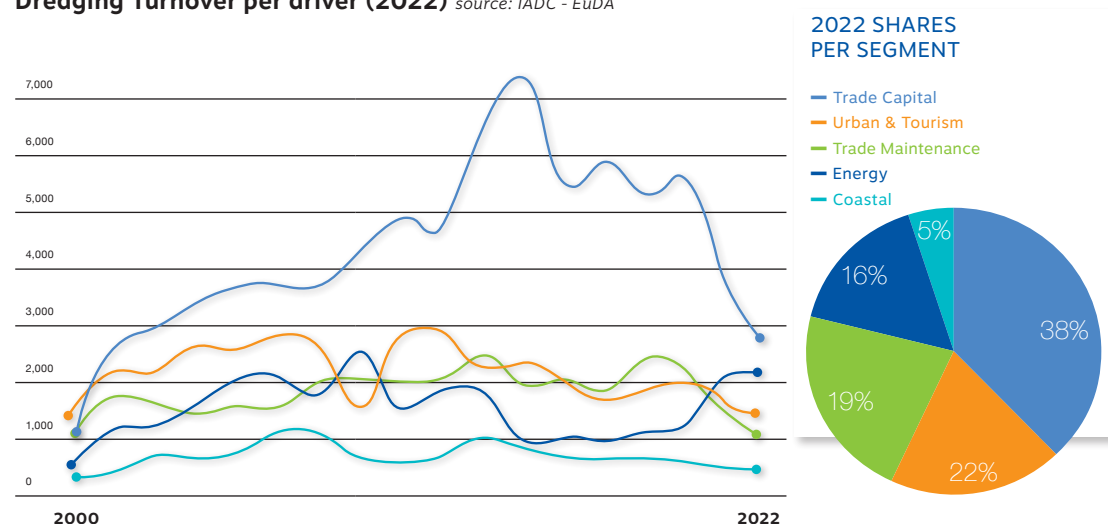
### Overview of the EuDA fleet's CO<sub>2</sub> emissions

When considering GHG emissions reduction, EuDA started collecting emission data for its fleet since 2008. In 2008, it was estimated that the world seagoing dredging fleet produced 6.3 Mton of CO<sub>2</sub>, of which the European dredgers (members of EuDA)



**Graph 1:**

**Dredging Turnover per driver (2022)** source: IADC - EuDA



produced 3.4 Mton. From 2008 to 2021, the total absolute emissions of the EuDA fleet (inside and outside Europe) have steadily decreased by over 40%.

(see Graph 1 and Graph 2 above)

However, it is important to highlight that this absolute reduction of emissions is the result of three drivers:

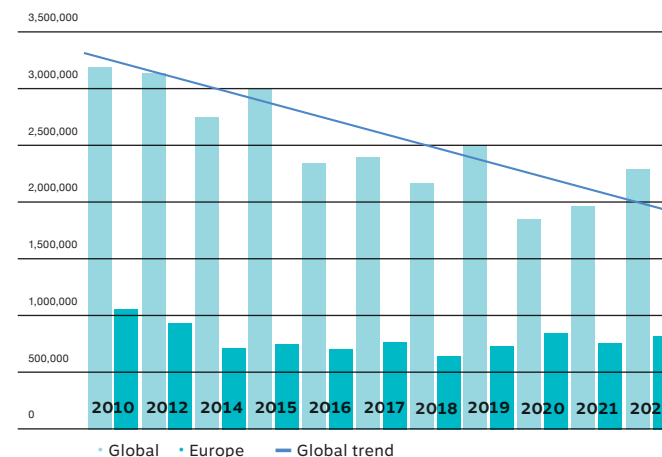
- two performance drivers: technology and operational processes;
- one market driver: demand for projects which impacts occupation rates.

With regard to the **Performance Drivers**, European Dredgers have invested billions in technology developments, innovative solutions and in further optimisation of dredging operations, which resulted in the steady (relative) reduction of CO<sub>2</sub> emissions per m<sup>3</sup> of dredged material (see graph 3).

<sup>1</sup> 11 billion Euro from 2008 to 2017.

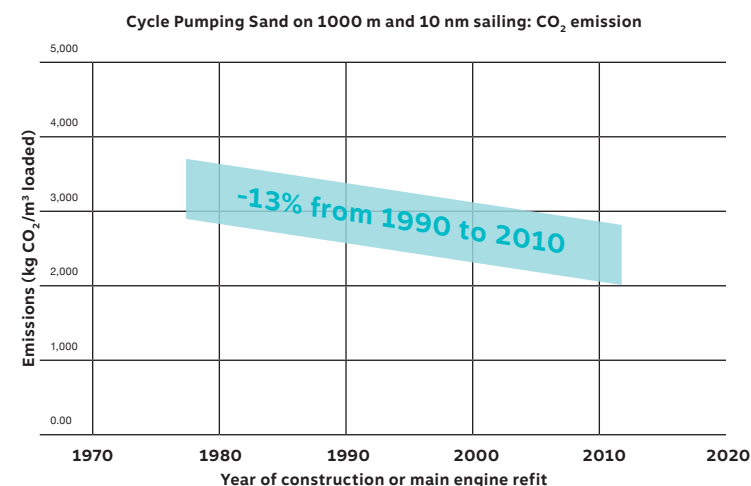
**Graph 2:**

**EuDA fleet CO<sub>2</sub> emissions (2010-2022)** source: EuDA



**Graph 3:**

**improved efficiency (reduced CO<sub>2</sub> emission) for a typical TSHD cycle**



NB: similar reductions have been achieved for other dredging vessel types (e.g. CSD)







It is important to highlight that reduction of CO<sub>2</sub> emissions per m<sup>3</sup> of dredged material is reaching its limits (asymptotic minimum) and therefore, from a technological point of view, future progress on reducing emissions should come from a step change innovation (e.g. sustainably produced carbon-free fuel).

With regard to the individual **Market Drivers**, they can work both ways: they can either reduce emissions or they can increase them. The **overall absolute emissions** result from the balance between those drivers (net reduction or net increase).

As illustrated in graph 2 above, the general trend of the EuDA dredging fleet emission is downward. However, this graph also shows isolated peaks, such as in 2015, when the emissions soared to 3.0 Mton, due to a surge of activity for the expansion of the Panama and Suez Canals, and such as in 2010, due to a surge of activity in Europe for the reclamation of Maasvlakte 2 in the Netherlands. These peaks demonstrate that a surge of activity not only can slow down the absolute emissions reduction by compensating the relative improvement but even break the general downward trend.

In 2020, EuDA's global emissions amounted to 1.9 Mt, which is the lowest on record so far. This

reduced level of emissions was reflecting in part the efforts and investments of the European Dredgers to reduce their emissions but the overall reduction was also in part due to the COVID pandemic which significantly reduced activity levels in 2020. The two years following COVID, 2021 and 2022, have

been particularly busy for the dredging companies and their respective occupation rates were high. Although below pre-COVID levels, the CO<sub>2</sub> emissions of the EuDA fleet increased in 2021 and 2022, rising above the symbolic 2 Mt due to the general increase of activity. Compared to 2008, absolute emissions of

**Table 1: EuDA fleet CO<sub>2</sub> emissions (2008-2021)** *source: EuDA*

EuDA Sea-going dredging equipment			
Global operations	Installed power MW	Fuel consumption kton	CO <sub>2</sub> emissions kton
2008	1,510	1,090	3,440
2010	1,591	999	3,155
2015	1,298	959	3,033
2016	1,264	751	2,371
2017	1,516	777	2,449
2018	1,421	675	2,134
2019	1,564	768	2,430
2020	1,451	583	1,860
2021	1,398	644	2,052
2022	1,466	717	2,285

European operations	Installed power MW	Fuel consumption kton	CO <sub>2</sub> emissions kton
2008	420	280	880
2010	654	420	1,326
2015	409	223	713
2016	306	207	663
2017	369	195	624
2018	485	238	763
2019	500	214	682
2020	605	258	826
2021	487	219	701
2022	598	233	744



CO<sub>2</sub> from the dredging fleet in 2021 and 2022 have decreased by 30% to 40%. For the past 10 years, the level of CO<sub>2</sub> emissions in Europe by the European Dredgers is staying between 600-800 ktons of CO<sub>2</sub>, below 2008 (880 ktons).

### Next Steps

EuDA will continue to implement and further communicate on its CO<sub>2</sub> Strategy. EuDA members intend also to pursue a closer **communication and cooperation with academia**, including non-engineers and multi-disciplinary contacts, to define further research questions and possibly establish a multi-disciplinary centre of excellence.

Following the significant change in the legislative and political landscape since 2009, EuDA will review its data collection template and make sure it is aligned with the most recent IMO/EU data requirements (e.g. CH<sub>4</sub> and N<sub>2</sub>O emissions).

### European Sustainable Shipping Forum (ESSF)

The European Sustainable Shipping Forum (ESSF) is a forum established by the Commission for structural dialogue, exchange of technical knowledge, cooperation and coordination between the Commission, Member States' authorities and maritime transport stakeholders on issues pertaining to the sustainability and the competitiveness of EU maritime transport.

### Ship Energy Efficiency (SEE)

The Sub-group on **Ship Energy Efficiency** (SEE) assists and advises the European Commission on issues related to the improvement of ship energy efficiency, with a focus on improving energy efficiency of ships by means of **mandatory measures**.

### Sustainable Alternative Power for Shipping (SAPS)

The Sub-group on **Sustainable Alternative Power for Shipping** (SAPS) assists and advises the European Commission on issues related to the development and deployment of alternative power solutions for shipping. This would include matters on alternative sustainable **low- and zero-carbon fuels and propulsion methods**, with a view to improving the current understanding of the available solutions and their potential, better target and prioritise the R&I investment, where appropriate

pilot the deployment of certain solutions, and assess the gaps in the current regulatory framework to ensure enough ambition will be reached.

### Joint meetings with DG CLIMA Expert Group

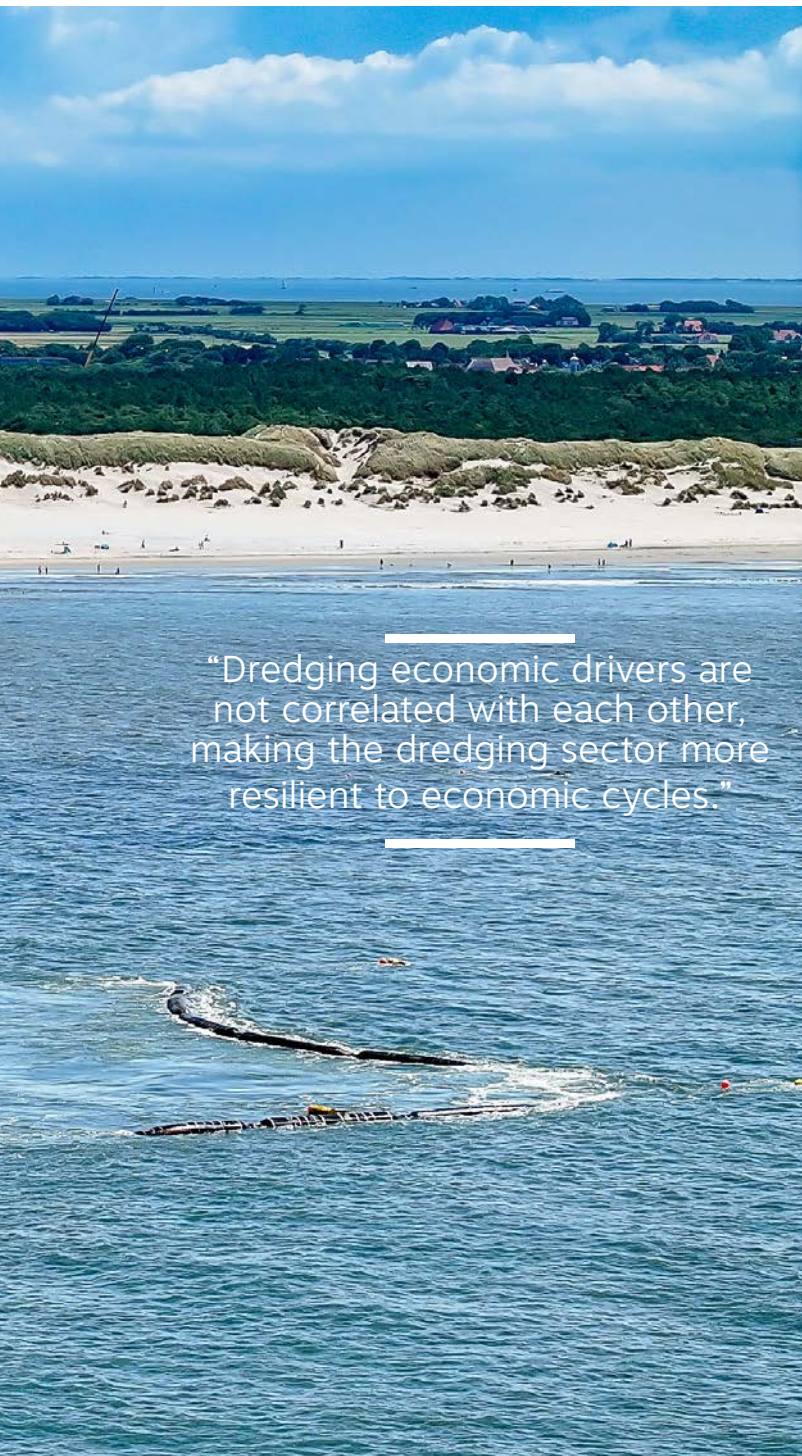
As a member of ESSF SAPS, EuDA, was invited to two joint meetings with the Climate Change Expert Group (CEEG) of DG CLIMA to discuss the practical details of the **extension of ETS to shipping**. The exchanges were open and constructive. EU and Member States Officials and industry representatives (KVNVR, KBRV, ECSA, ICS, ...) were participating (in person and on-line). One of the main issues for dredgers is the absence of a **definition for offshore vessels** in EU law and the unclarity regarding the treatment of dredging vessels in the ETS/MRV.

“In 20 years, the CO<sub>2</sub> performance of European dredging vessels improved on average by 15%.”









“Dredging economic drivers are not correlated with each other, making the dredging sector more resilient to economic cycles.”

### **THANK YOU, Linda!**

*On behalf of EuDA's Emissions Working Group, I would like to thank you, Linda Behage, for your excellent work and your cooperation with the dredging industry over the past year!*

*You only joined the Emissions WG in 2022 but we appreciated the time you dedicated to the EuDA EmWG, discussing emissions issues and European legislation affecting the dredgers.*

*We wish you all the best in your new endeavour.*

*Thank you, Linda, for your dedication and support to our industry,*

*Farewell!*

**Paul Vercuijsse**

EmWG Chairman



Linda Behage  
(VO)

### **THANK YOU, Coert!**

*On behalf of the EuDA Emissions Working Group, I would like to thank you, Coert Begemann, for your excellent work and your cooperation with the dredging industry over the past year!*

*You only joined the work of the Emissions Working Group of EuDA in 2021 but we appreciated the time you dedicated to the EuDA EmWG, discussing emissions issues and European legislation affecting the dredgers.*

*We wish you all the best in your new endeavour and welcome your successor Mr Harold Slump.*

*Thank you, Coert, for your dedication and support to our industry,*

*Farewell!*

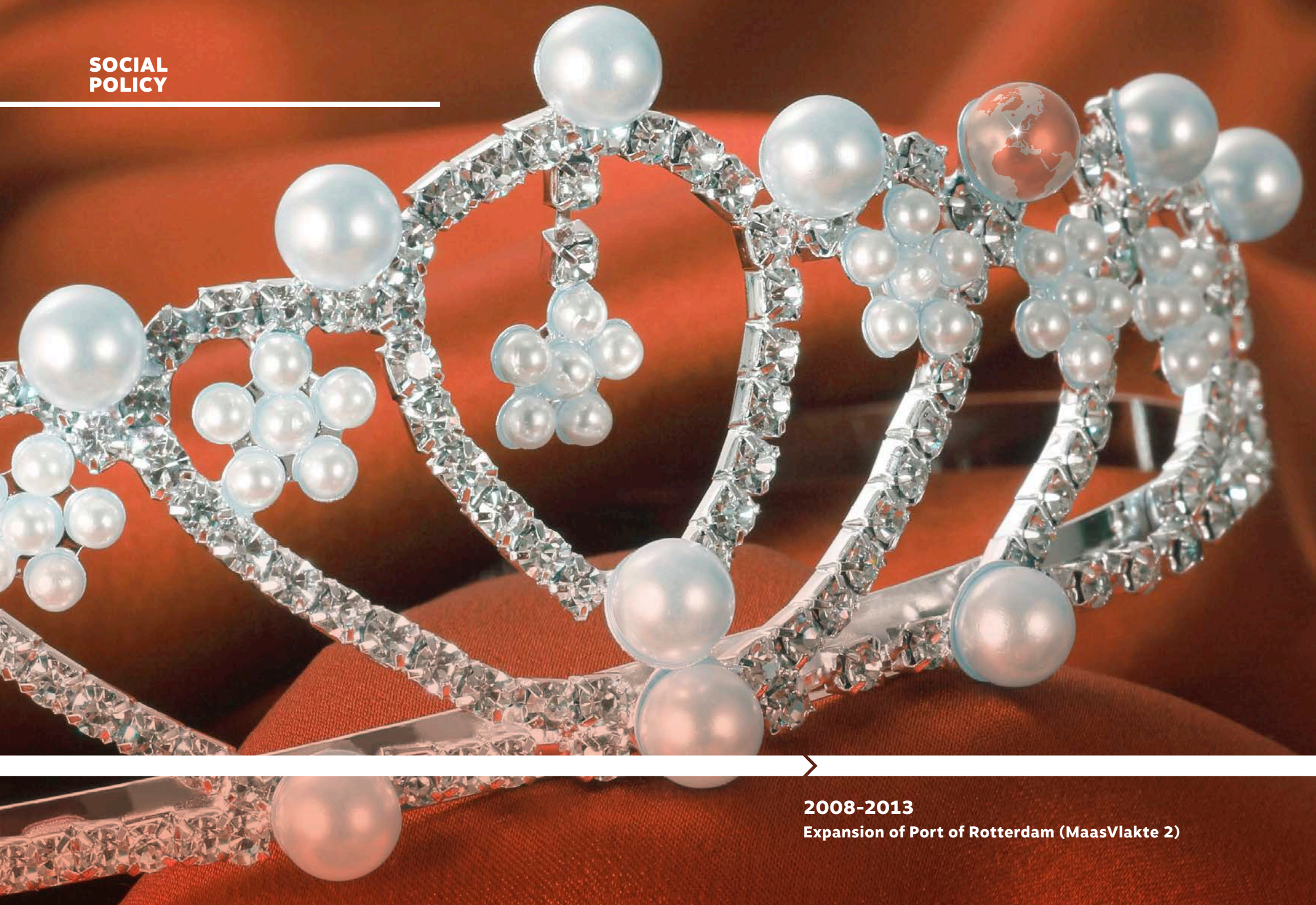
**Paul Vercuijsse**

EmWG Chairman



Coert Begemann  
(DD-DB)





**2008-2013**  
Expansion of Port of Rotterdam (MaasVlakte 2)





## Port of Rotterdam The Netherlands

September 2008 - May 2013

### 2008-2013

expansion of Port of Rotterdam  
(MaasVlakte 2)

building of the island platform for  
the extension Port of Rotterdam on  
the mouth of the River Maas



**Vessels** 23 TSHDs and 4 CSDs

**Works** dredging of 240 Mm<sup>3</sup> of sand and 7 Mton quarry stone for a total land reclamation of 2,000 ha; 2.35 km deep sea quay wall (20 m deep); 1.15 km barge/feeder quay wall (11-13 m deep); 3.5 km hard sea defences (stone dune and block dam); 7.3 km soft sea defences (beaches and dunes); 11 km sea wall; 13 km roads (partly 2x2 lanes/cycle paths); 14 km rail (twin track)

### Main Technical Challenge

the unparalleled complexity and enormous dimensions of the project as well as the short execution time





### EuDA Social and Labour Strategy

From its inception in 2003, the EuDA Social Committee (SocCom) worked towards establishing and implementing the common **EuDA Social and Labour Strategy**. The main objectives of the EuDA Labour Strategy have been to harmonise and simplify the administrative treatment of seafarers and project staff ('industrial personnel') inside and outside Europe as well as improve market access and labour mobility.

### Long-Term Vision

EuDA's long-term vision was established to proactively feed the EuDA Strategy on European social legislations and its Annual Action Plans, with a focus on key priorities, such as the State Aid Guidelines to Maritime Transport.

EuDA identified 5 clusters of key priorities for the European Dredgers, that were directly or indirectly related to State Aid to Maritime Transport:

1° Simple, Harmonised and Clear European legislations *Dredging is at the centre of many European legislations regulating its operations (dredging & offshore projects), its working equipment (e.g. dredging & offshore vessels) and its people (seafarers, engineers, working permits, visas, ...). The continuous development of (new) legislation at all levels (international, regional, national, sub-national) has significantly increased legal complexity which, in turn, often creates various levels of **legal uncertainty**.*

2° Labour Availability, Qualifications, Mobility

*Like many other maritime sectors, dredging is faced with a significant lack of qualified staff (seafarers, engineers, ...). This situation is also aggravated by labour mobility issues (restrictions on certification, visas and working permits) and by working conditions restrictions (e.g. working hours) inside and outside the EU.*

3° Unfair Competition

*The global emergence of non-EU State-owned Enterprises (SoEs) supported by their national frameworks of tied financing schemes has significantly distorted global competition. Heavy subsidy schemes allow these SoEs to gain markets at*

### 2023 Members of the EuDA SocCom

The Social Committee (SocCom) is a permanent committee established by EuDA to provide the EuDA Board with expert advice and support on social related issues (primarily in European legislation), which can have a significant impact on the European Dredging Industry.



Hans Casier  
(SocCom Chairman,  
DEME)



Katleen De Geyter  
(Jan De Nul)



Robbert Veenstra  
(Boskalis)



Paris Sansoglou  
(EuDA)



Silvia Selandari  
(EuDA)



*the expense of their foreign competitors. Competitive companies need a level playing field to be able to fairly compete on merit (knowledge, experience, skill, technology, quality of the delivered services, added value to society and price).*

#### 4° Not Future Oriented Governance

*The Green Deal requires European and national legislations to become future-proof and climate-proof. This also means that the governance of European and national administrations should be adapted to achieve these future-proof and climate-proof objectives as innovation friendly decision-making systems are not static but dynamic and need regular adaptation.*

#### 5° Enforcement and Compliance Checking

*Levels of enforcement and compliance checking are very variable between countries and within countries, including in the EU. A more effective and better targeted system should be considered and implemented.*

Although these clusters of issues cover all facets of dredging activities, this chapter will only focus on the labour issues or social aspects.

### Hierarchy of Labour Laws

As part of its strategic priority “Simple, Harmonised and Clear European legislations” the EuDA identified situations in which the European dredging companies were faced with issues on determining the effective law applicable to their activities. Dredging vessels can typically operate in international and territorial waters. The applicable laws are international, European, federal and national. The key question is about the hierarchy of their applicability: *which supersedes which? and under which conditions?*

This situation is not widespread in Europe and concerns so far Germany, Denmark and France. These different cases result from individual initiatives by the Member States rather than a new European policy. EuDA has principally worked on two cases, one in Germany and one in France and compiled recommendations in a EuDA Paper for the attention of public administrations (such as IMO, ILO, European Commission and Flag States), regulating and enforcing labour laws on ships. The EuDA paper provides an overview of the laws applying to dredgers working on dredging and offshore projects and attempts to clarify their respective hierarchy.

### Legal Opinions and EuDA Position

For its legal analysis and opinion, EuDA consulted prominent German and French law firms, specialised in maritime law. On the basis of their feedbacks and findings, EuDA prepared a paper on “*European Labour Laws applying to Dredgers*”. In this paper, **EuDA highlights that dredging and offshore service activities** are considered under European law as part of the **merchant navy** (transporting goods and passengers). There are legal provisions in the European legislation pointing to one or the other option. Under the State Aid Guidelines to Maritime Transport, dredging vessels are explicitly mentioned and the current EU practice also incorporates the offshore vessels. In the EU MRV, the specificity of working vessels was highlighted to exclude them in a first phase from the scope of the legislation targeting the shipping industry.

The main conclusions highlight that when EU flagged maritime ships (with a gross tonnage >650GT) provide **dredging services or offshore supply services for windfarms**, they should be considered as performing cabotage services and treated like any other ship transporting goods under the European law, and thereby their seafarers should be also treated accordingly. Thereby, **the seafarers on board**



**dredgers should not be subject to the national rules** (e.g. French ‘mandatory’ rules) applying to personnel employed onboard ships, regardless of the flag, which are used to perform services mainly in territorial or inland waters.

### Review IMO rules on 12 industrial personnel on board ships

#### Offshore Energy Sector

Due to the growing importance of the offshore energy sector, including renewable energy construction projects, clear and adapted requirements were needed *to facilitate the safe and efficient transfer of technicians serving offshore installations.*

The aim of the International Code of Safety for Ships Carrying Industrial Personnel (**IP Code**) is to provide minimum safety standards for ships that carry industrial personnel, as well as for the personnel themselves, and address specific risks of maritime operations within the offshore sector, such as personnel transfer operations.

#### New mandatory requirements

The IMO (MSC 106) has adopted in November 2022 a new mandatory IP Code, anchored in a new SOLAS Chapter XV. The code will enter into force on **01/07/2024** and enable cargo ships and high-speed

cargo craft to transport and accommodate industrial personnel working offshore<sup>1</sup>.

The new IP Code is based on the Code of Safety for Special Purpose Ships (2008 SPS Code), but with adaptations and provisions for the training of industrial personnel, the safe transfer of personnel and the carriage of dangerous goods in combination with industrial personnel (*the carriage of toxic products, low-flashpoint products, and acids as cargo will not be allowed on IP ships carrying more than 60 persons on board*).

The new IP Code will apply to new ships constructed after 01/07/2024 which:

- are of 500 GT and above,
- operate on international voyages, and
- carry more than a total of 12 industrial personnel, special personnel and passengers combined.

Grandfather provisions will allow existing ships, which are already authorised by the flag administration to carry industrial personnel, to obtain an **Industrial Personnel Safety Certificate** by complying with parts of the IP Code, i.e. the provisions for training, safe personnel transfer, life-saving appliances and the carriage of dangerous goods.

### Levelling the playing field in Europe on Social aspects

As part of its strategic priority “Unfair Competition”, EuDA is monitoring labour issues around Europe and tries to maintain or improve the level playing field in Europe from the angle of social legislations and working conditions.

#### Unfair competition from China

Unfair competition from China has been a growing and intensifying phenomenon for over ten years. For the last 5 years, more and more issues have been reported inside Europe. Since 2019, EuDA is developing a **European Trade Strategic Toolbox** with a set of policy and legislative instruments to stop these unfair competition practices by the Chinese SoEs to further harm the European Dredgers (in Europe and around the world).

In this context, EuDA has included in the scope of the toolbox possible social and labour related instruments. EuDA continuously *reflects on ways in which social regulations (permits, visas, language/nationality requirements, ...) can be used or adapted to increased level playing field by preventing non-EU SoEs from using unfair trade practices (dumped social conditions, forced labour, ...) inside Europe.*

<sup>1</sup> It is the personnel engaged in the construction, maintenance, decommissioning, operation or servicing of offshore facilities, such as windfarms, as well as offshore oil and gas installations, aquaculture, ocean mining or similar activities.



Strict requirements on European Flag and crew could provide sufficient barriers to stop these unfair practices by non-EU SoEs. However, this is a strategic decision that needs to be taken at company level as it will impact operations.

The main difficulty is to strike a healthy balance between avoiding the pitfalls of social dumping and other unfair competition practices and keeping sufficient flexibility in labour treatment in order to fit the industry's needs and to keep it competitive.

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“The big challenge is to strike a healthy balance between Labour Protection and Labour Flexibility.”

---

### Posting of Workers

In order to prevent unfair competition through social dumping, existing EU legislation, such as the Directives on the Posting of Workers can enforce relevant minimum standards on labour and working conditions. The Directives on the Posting of Workers include:

- 1° EU Directive 96/71/EC on “*the posting of workers in the framework of the provision of services*” (16/12/1996);
- 2° EU Directive 2014/67/EU on “*the enforcement of Directive 96/71/EC concerning the posting of workers in the framework of the provision of services*” and amending IMI Regulation EU/1024/2012 on “*administrative cooperation through the Internal Market Information System*” (15/05/2014); and
- 3° Directive (EU) 2018/957 amending Directive 96/71/EC concerning the posting of workers in the framework of the provision of services (28/06/2018).

These legislations contain provisions that could be used to create additional barriers and impose restrictions on movement of **natural persons**, such as:

- requirements on **residency or nationality or language**;
- restrictions or processing delays on **visas & work permits** (hindering companies and crews from outside the EU);

- requirements on **licensing/certification**;
- ...

However, for each legislative/policy option, the consequences for the European industries should be carefully considered. For instance, some provisions in these general legislations can appear to conflict with the same provisions on accepted business practices included in sector-specific agreements (i.e. **Collective Labour Agreements**):

Art. 3 of the posting of workers Directive stipulates that Member States shall ensure equal treatment as well as the following requirements:

- **maximum work periods** and **minimum rest periods**;
- **minimum paid annual leave**;
- **remuneration, including overtime rates**
- **health, safety and hygiene** at work;
- the conditions of workers' **accommodation** where provided by the employer to workers away from their regular place of work;
- [...]









Besides their existence, these general or specific legal provisions also need to be enforced systematically and effectively. Ideally the enforcement systems should reward compliance by adapting accordingly the frequency of their checks: the checks' frequency would be increased on the regularly non-compliant entities and reduced on the systematically compliant entities. At this stage, the enforcement is more perceived as a bureaucratic burden rather than a level playing field instrument that can be used to filter out unfair competitors. All EU rules should apply to all companies working in the EU, including and especially non-EU SOEs. However, these legislative provisions should not be discriminatory to remain WTO compliant.

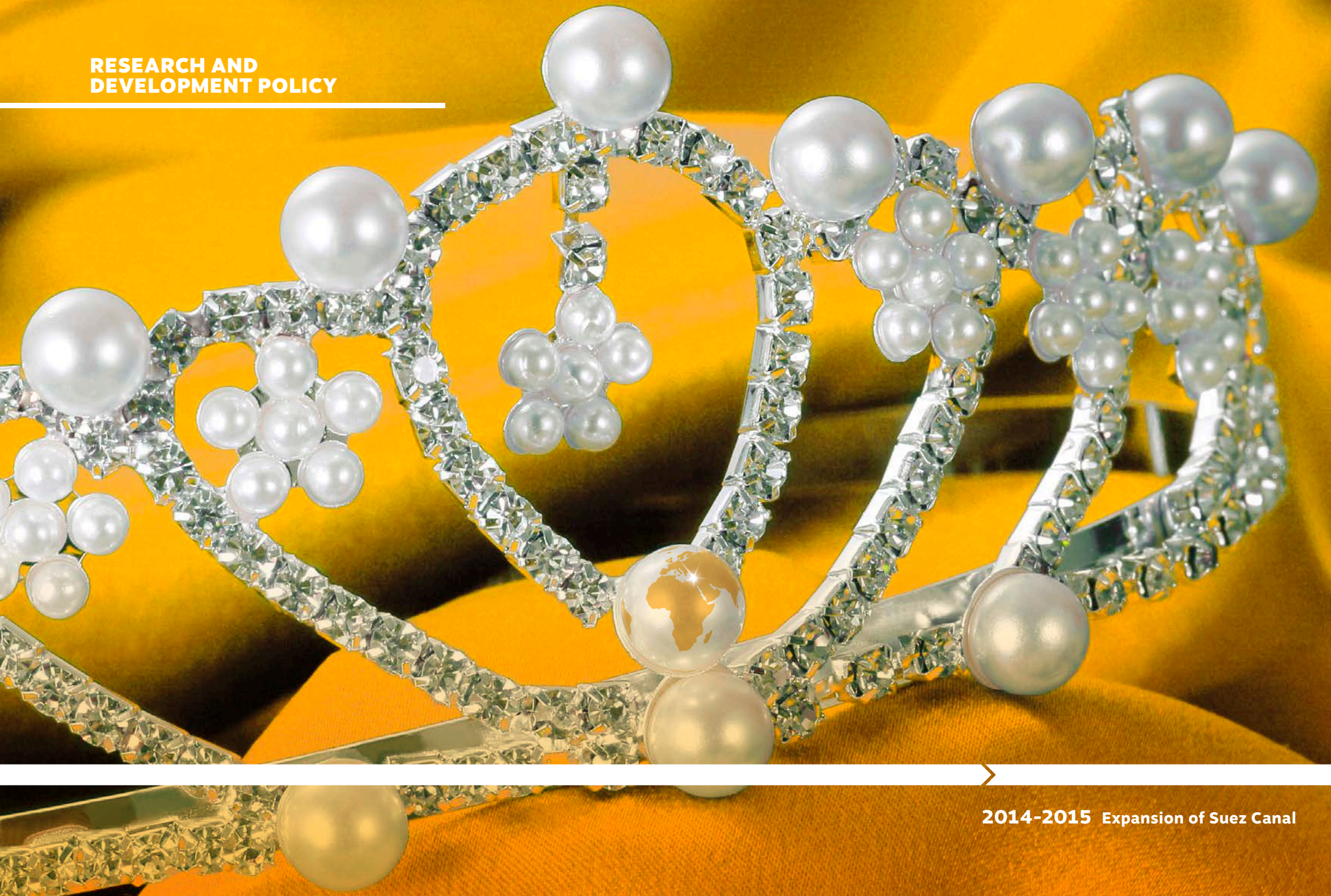
#### **EU State Aid: follow-up on DG Competition**

EuDA position paper on State Aid will be updated, in view of the announced revision of the Maritime Guidelines in 2023.

#### **EuDA's main recommendation on State Aid still stands**

*"while keeping dredging in their scope, the Guidelines should exempt dredgers from the "50% Rule" and possibly consider enlarging their coverage to other self-propelled ocean-going dredging vessels (such as CSDs)".*









**Egypt**

**November 2014 - September 2015**

**2014-2015**

expansion of Suez Canal:  
capital dredging for the creation of  
the new Suez Canal, Egypt



**Vessels**

5 TSHDs and 21 CSDs

**Works**

dredging of 250 Mm<sup>3</sup> of sand (loose/dense/very dense)  
clay, gypsum for a total deepening of 24 m with 147 m  
bottom width on a length of 35 km

**Main Technical Challenge**

complete the project within one year





### European Dredgers Innovating around the world

In their high-tech high added-value maritime segments, the European Dredgers can only compete where markets are open. They maintain their global leadership thanks to their drive to innovate faster than their competitors can imitate them. To provide added value to global logistics, global environment and global society, the European dredging companies are continuously investing in Research, Development and Innovation (RDI) for new vessels and equipment, for improved or new processes and operations as well as for top notch training and education. World leadership in global markets is not a destination but a journey of continuous self-improvement towards the constantly moving target of excellence.

In order to keep the innovation flow running, EuDA promotes innovation-friendly legislation and governance. Indeed, when innovative solutions appear, they can be hindered or blocked by too prescriptive legislation or unadapted governance. This is why EuDA promotes goal-based legislations and performance-based standards over prescriptive ones, and this is particularly true in globally competitive sectors.

EuDA also promotes the Life Cycle Assessment (LCA) of the costs and benefits of the different possible

alternative solutions for an infrastructure project's design, execution, operation and decommissioning. Typically, only the costs of the building phase are considered for awarding the projects while the possible added-value or cost reductions occurring afterwards (during operations, maintenance, or during decommissioning) are usually not taken into consideration. It is a well-known fact however that *"the cheapest solution at the point of purchase/procurement means a more expensive asset to hold and manage"*. Without an **adapted governance**, innovative and sustainable solutions cannot be mainstreamed. By integrating long-term metrics and impacts in the decision-making, the life cycle approach opens up the range of solutions to more sustainable solutions (from hard solutions to soft solutions) and provides decision-makers with the proper long-term assessment tools to invest in sustainable assets.

The Green Deal is the top priority of the European Commission and has the potential to become a game changer in the coming years, as in improving Europe's environmental footprint it will also offer opportunities to the greener and more innovative companies. Significant investments are needed for this transition including in new technologies, equipment, processes and people.

When considering the optimisation of sustainability criteria, the following comprehensive approach provides insights on the four interconnected drivers of energy and other resources consumption for a dredging project: the **design** of projects (often determined by clients) and the design of equipment (translating the vision and know-how of dredgers), as well as the **execution** of projects (working methods, type of equipment) and the **operational use** of equipment (optimal efficiency and skilled crew).

European Dredgers are continuously investing in new equipment and technology (e.g. over €11.1 bn invested in new equipment from 2008-2017) to improve their environment impacts, including in RDI and trainings to improve the efficiency of their operations and systems. EuDA members are already investing in the Green Deal.

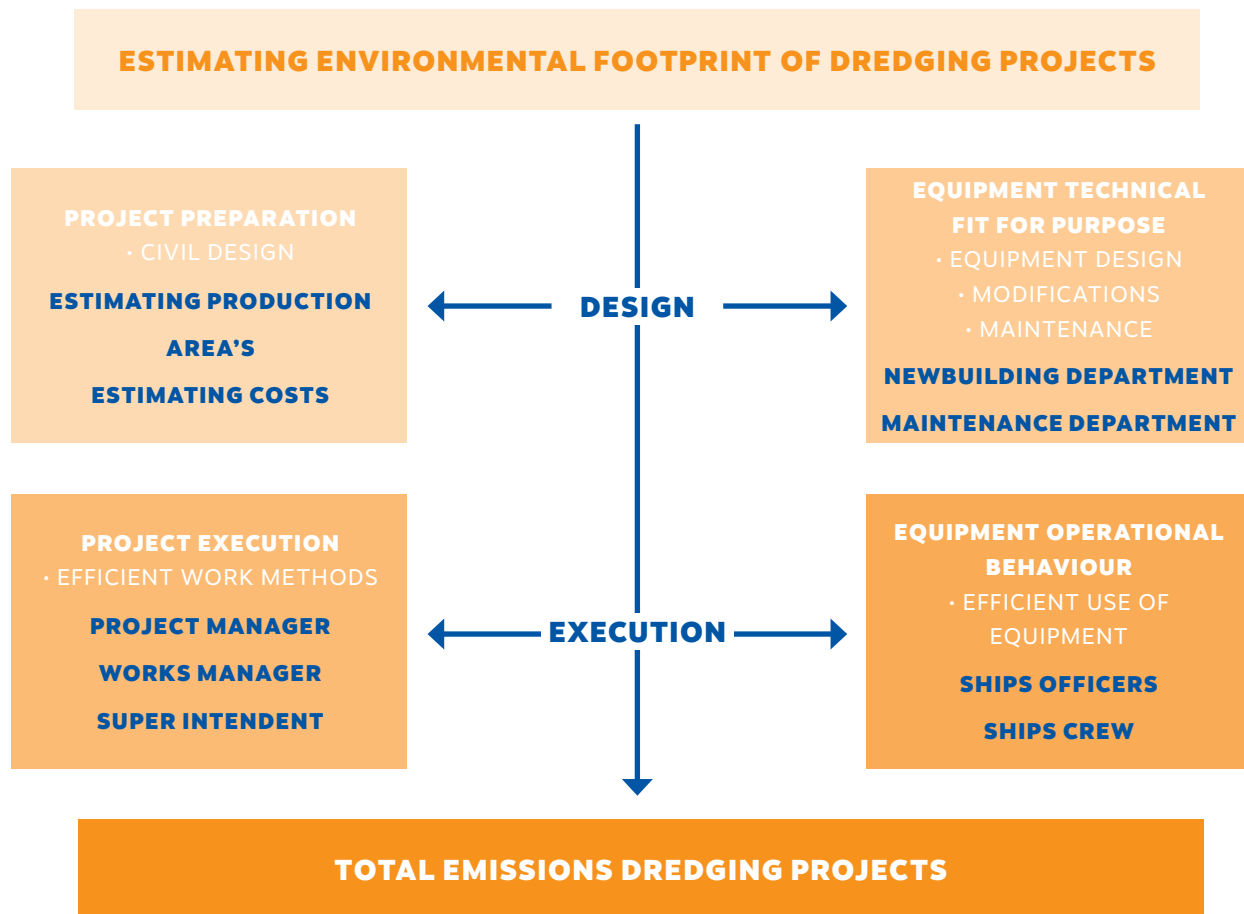
### WATERBORNE Technology Platform



The WATERBORNE TP is an industry- **WATERBORNE** oriented Technology Platform gathering waterborne (maritime, inland navigation and lakes) stakeholders such as classification societies, shipbuilders, shipowners, ports, maritime equipment manufacturers, infrastructure and service providers, universities or research institutes, as well as representatives from the EU Institutions and the Member States.



“World leadership in global markets is not a destination  
but a journey of continuous self-improvement”



WATERBORNE TP reinvented itself and adapted to the new requirements of the European research funding environment. The restructuring of the platform involved the creation of a permanent secretariat and management structure as well as the creation of a flagship **Co-Programmed Partnership (CPP)** on “Zero-Emission Waterborne Transport” within the framework of Horizon Europe.

Even before the Green Deal, the European Commission has been encouraging in its successive research framework programmes the mainstreaming of carbon-free, climate neutral technologies, fuels or solutions for the maritime industries. The Green Deal has made the Co-Programmed Partnership on Zero-Emission Waterborne Transport (CPP) a top priority.

The CPP secured around 530M€ from Horizon Europe until 2027 for the waterborne transport to develop technologies and innovations to achieve zero-emission waterborne transport by 2030. The CPP plays a central role in providing and mainstreaming technological solutions for shipping to achieve the Green Deal’s “Fit for 55” objectives and achieve the Paris Agreement targets.



Next to the CPP, the WATERBORNE TP continues to feed the European Commission's Research topics through dedicated Strategic Research and Innovation Agendas (SRIA). As member of the platform, EuDA provided input on dredging for the SRIA on Blue Economy.

The WATERBORNE TP organised in September 2023 a **High Level Meeting on the Waterborne Transport Sector**. The 2-hour meeting was co-hosted by the European Commission. Maritime stakeholders met with interested Commission services (such as DG RTD, DG CLIMA, DG ENV, DG MOVE, DG COMP, DG TRADE) to discuss the -issues and priorities of the maritime stakeholders.

The Waterborne Community emphasised the strategic importance of the sector and the urgent need for a coordinated approach at EU level to tackle “uneven” playing field in relation to non-EU countries, in most transport modes. The agenda of the meeting covered the following policy priorities for the maritime industries: RD&I, energy, deployment of innovations and infrastructure, zero-emissions, climate mitigation objectives, digitalisation, a human-centred approach, subsidies and state-aid, WTO, standard setting (environmental, social, economic).

The new light provided by the discussions improved the understanding of the pressing issues of the sector and of the critical role policy-makers and legislators can play to waive these off.

#### European Maritime Days 2023, in Brest (France)



Created by a tripartite declaration by the Presidents of the European Commission, the European Parliament and the Council of the EU, the European Maritime Day (EMD) is celebrated on and around the 20th May every year and aims to raise the visibility of a Maritime Europe.

The 16th edition of the European Maritime Day (EMD) took place in Brest, France on 24 and 25 May 2023. Deviating from the tradition of the previous editions, the series of workshops covered all the European Maritime Issues, without any predefined master theme.

In his opening speech, the European Commissioner for Environment, Oceans and Fisheries, Mr Virginijus Sinkevičius stated: “*Without you [the maritime*

*stakeholders], the idea of a sustainable Blue Economy would only remain an idea. **Decarbonisation**, together with security and the economy are key for the coastal communities and for all citizens in the EU.*”

#### International Standards possibly challenging Innovation

In 2015, upon proposal by China Communications Construction Company Limited (CCCC) a WG 11 on “Dredgers” was created under the jurisdiction of ISO Ships and Marine Technology Committee ISO/TC8 for the purpose of proposing new standards for dredging technology. Since then, WG 11 and other ISO/TC8 WGs have been actively producing standard proposals for dredging equipment and processes, some of which have completed the process and become new ISO standards. These standard proposals are usually pushed through fast-tracking procedures, which tend to elude their opposition’s attention due to the added time pressure on the voting participants.

Most of these dredging standards were introduced under the shipbuilding/equipment side of dredging and not the earthworks (hydraulic fill) side: hence their focus on the production means (equipment) rather than their output (purpose of the equipment). However, these standards may well create issues



for dredging operations (e.g. negatively impacting innovative processes).

EuDA's analysis revealed that in most cases these proposals are clearly **not output standards** and do not address the **quality level of the output**, but rather prescriptive descriptions on how to do the dredging works or mere lists of definitions with often no common structure. Prescriptive legislations or standards are known to be detrimental to innovation. EuDA, instead, promotes goal-based legislations and performance-based standards. Moreover, the general impression is that the initiated dredging standards proposals also aimed at gathering (missing/lacking/new) knowledge, understanding and information about the processes on board the concerned dredgers.

EuDA created in 2015 an ad hoc Task Group on Dredging Standards to ensure that the adopted standards for

dredging vessels, equipment and projects are of the highest quality and that unnecessary standards proposals are stopped. During the confinement years due to COVID, most activity regarding the ISO proposed standards was stopped in ISO/TC8 WG 11.

However, with the ending of confinement measures, activity in WG 11 restarted and the standard proposal ISO/NP 7613 Hopper Dredger Trailing suction tube position monitoring system was voted through the ISO process in July 2023 (including the Committee Draft ballot). The proposal (ISO/NP 7613) has become a draft international standard (ISO/DIS 7613). EuDA experts will continue their work on standard proposal *"Hopper Production Measurement System for TSHD"*.

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“No  
Green Deal  
without  
sustainable  
Blue Economy.”

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Świnoujście  
Szczecin  
Poland

September 2018 - March 2022

**2018-2022**  
deepening of the Świnoujście -  
Szczecin fairway, Poland



**Vessels** 3 TSHDs and 1 CSD

**Works**  
dredging of 24 Mm<sup>3</sup> of sand, clay and  
peat for a total deepening of 12.5 m on  
a length of 62 km combined with the  
construction of 2 artificial islands in the  
Szczecin lagoon



**Main Technical Challenge**  
sizeable traffic management to  
keep the fairway active during the  
whole execution period (including  
at the peak of the Covid pandemic);  
handling of unexploded ordinances  
(UXO's) from WW II





## MEMBERS



### Belgium

Baggerwerken Decloedt & Zoon N.V.  
 DEME Building Materials N.V. (DBM)  
 DEME Environmental N.V.  
 DEME Offshore BE N.V.  
 Dredging International N.V.  
 Dredging & Contracting Belgium N.V.  
 Ecoterres S.A.  
 Fédération du Dragage Belge A.S.B.L.  
 Jan De Nul N.V.  
 Kalis S.A.  
 Van den Herik N.V. (Brugge)



### Bulgaria

Boskalis Offshore Subsea Contracting B.V.



### Cyprus

BKW Dredging & Contracting Ltd.  
 Boskalis Westminster Contracting Limited  
 BW Marine (Cyprus) Limited  
 Dredging International Services (Cyprus) Ltd.  
 Van Oord Middle East Ltd.



### Finland

Terramare Oy



### France

Atlantique Dragage S.A.R.L.  
 CBD S.A.S.  
 Eco Systèmes de Dragage  
 Granulats de la Manche Orientale GIE (GMO)  
 Société de Dragage International S.A. (SDI)  
 Sodranord S.A.R.L.  
 Sodraco International S.A.S.



### Germany

DEME Offshore DE GmbH  
 HDC Wasserbau GmbH Nord  
 Hegemann GmbH / Dredging  
 Heinrich Hirdes GmbH  
 Jan De Nul Nassbaggerei und Wasserbau GmbH  
 Nordsee Nassbagger-und Tiefbau GmbH  
 OAM-DEME Mineralien GmbH  
 Strabag Wasserbau GmbH  
 Van den Herik GmbH  
 Van Oord Wasserbau GmbH  
 Vereinigung der Nassbaggerunternehmen E.V.



### Gibraltar

Van Oord (Gibraltar) Ltd.



### Ireland

Irish Dredging Company Ltd.  
 Van Oord Ireland Ltd.



### Italy

Boskalis Italia S.r.l. Unipersonale  
 Branch DEME Environmental Italy  
 Dravo S.A. Italy Branch  
 Società Italiana Dragaggi SpA (SIDRA)



### Latvia

Baltic Marine Contractors SIA  
 Dredging International N.V. Filiale Latvija



### Lithuania

UAB Boskalis Baltic



### Luxembourg

DEME Offshore LU S.A.  
 Dredging and Maritime Management S.A.  
 Dredging International (Luxembourg) S.A.  
 Société de Dragage Luxembourg S.A.



### Netherlands

Aannemingsmaatschappij de Vries & van de Wiel B.V.  
 Baggerbedrijf De Boer B.V. / Dutch Dredging B.V.  
 Baggermaatschappij Boskalis B.V.  
 Boskalis Nederland B.V.  
 Boskalis International B.V.  
 Boskalis Offshore Subsea Contracting B.V.  
 DEME Building Materials B.V. (DBM)  
 DEME Offshore NL B.V.  
 Dredging and Contracting Rotterdam B.V.  
 Koninklijke Boskalis N.V.  
 Mijnster zand- en grindhandel B.V.  
 Paans van Oord B.V.



“United, we stand to promote our  
common values and defend our  
common interests.”

Van den Herik Kust- en oeverwerken B.V.  
Van der Kamp International Dredging B.V.  
Van Oord Dredging and Marine Contractors B.V.  
Van Oord Nederland B.V.  
Van Oord N.V.  
Vereniging van Waterbouwers



**Sweden**  
Boskalis Sweden AB  
Branch DEME Environmental Sweden



**UK**  
Boskalis Westminster Ltd.  
British Marine Aggregate Producers Association (BMAPA)  
DEME Building Materials Ltd.  
DEME Environmental Contractors UK Ltd.  
Jan De Nul U.K. Ltd.  
Llanelli Sand Dredging Ltd.  
NewWaves Solutions Ltd.  
Rock Fall Company Ltd.  
Van Oord UK Ltd.



**Norway**  
DEME Environmental Contractors N.V. (Branch Norway)  
Van Oord Norway A.S.



**Poland**  
Boskalis Polska Sp. z o.o.  
Van den Herik Polska Sp. z o.o.



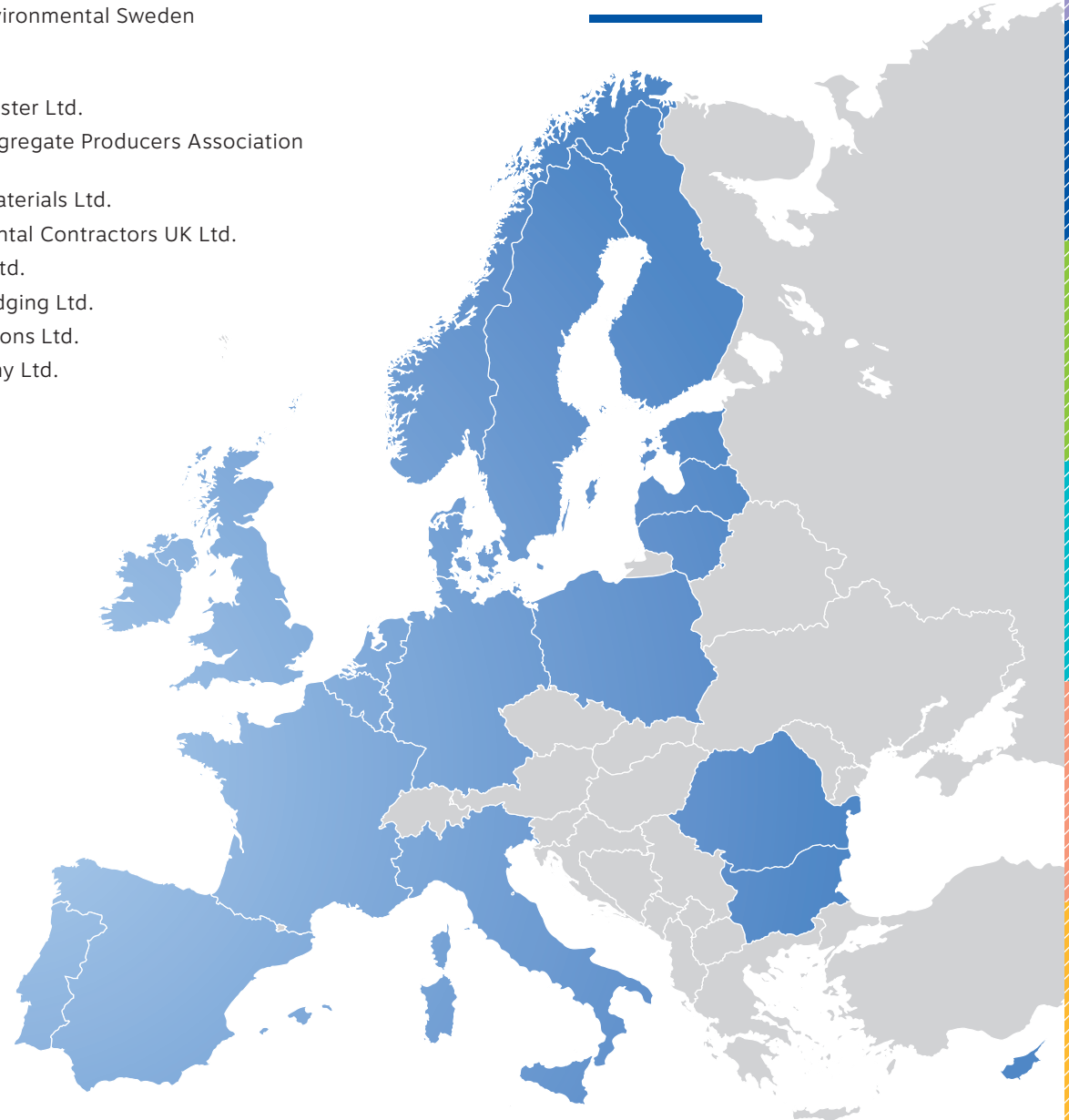
**Portugal**  
Boskalis Sucursal em Portugal  
Dragapor Dragagens de Portugal S.A.  
Dravo S.A. Portugal Branch  
Dredging International N.V. (Branch Portugal)



**Romania**  
Van Oord Dredging and Marine Contractors  
Romania Branch  
Boskalis S.R.L.



**Spain**  
Boskalis B.V. Sucursal en España  
Dravo S.A.  
Dredging International España S.A.  
Sociedad Española de Dragados S.A.





## EUDA VERIFICATION COMMITTEE

The purpose of the Verification Committee is to independently verify EuDA's annual accounts and certify that they are true, transparent and without irregularities towards all the members of EuDA gathering at the Annual General Meeting. The Members of this Committee provide additionally independent advice to the Board on the EuDA finances and therefore need to be from a different member organisation than the EuDA Treasurer's.

2023  
Members of  
the Verification  
Committee



Mieke Fordeyn  
(Jan De Nul)



Hilde Vermeire  
(DEME)



EuDA celebrates  
its 30<sup>th</sup> Anniversary  
in 2023

## ABOUT EUDA

Celebrating its 30<sup>th</sup> Anniversary in 2023, the European Dredging Association ("EuDA") was founded in 1993 as a non-profit industry organisation for European dredging companies and related organisations to interface with the various European Union's ("EU") Institutions and also some International Organizations (such as IMO, HELCOM, OECD or ILO). EuDA is registered in the EU transparency register as Interest Representative Nr. 2492574893-58.

Dredging activities are not well known by the wider public, but as a matter of fact, the European dredging companies, members of EuDA, are world market leaders with about 80% share of the (open) world dredging market and a turnover of 10.6 bn Euro in 2022. Although 70% of operations take place outside Europe, 90% of the returns flow back to Europe. EuDA members employ approximately 25,000 European employees directly "on board of the ships and on land" and more than 48,300 people indirectly (through the suppliers and services companies). The combined fleet of EuDA's members counts approximately 750 seaworthy EU flagged ships.

The Association assists its members with all kinds of requests related to dredging issues, presently strongly focusing on Social, Environmental, Technical and Trade issues. These issues are coordinated by the Secretariat and executed by its specialised working groups composed of experts from the member companies. The Association will pursue its goals by endorsing policies to create fair and equitable conditions for competition; commits to respecting applicable national, European and international rules and regulations; commits to operating its fleet safely, effectively and responsibly.







## NOTES

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## NOTES



## NOTES

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