



ANNUAL REPORT
2025

Securing against
the Fragility
of EU's most
exposed Assets



EUROPEAN DREDGING ASSOCIATION





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TABLE OF CONTENTS

EuDA's Sustainability Statement	?
industrial policy	?
international markets policy	?
environmental policy	?
climate change and coastal protection policy	?
social policy	?
research and development policy	?
EuDA members and organisation	?

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

African Proverb

EUDA'S SUSTAINABILITY STATEMENT

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).

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

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 by referring to the environmental footprint of the secretariat and the steps taken to reduce it.





Securing against EU Critical Assets' Fragility, new Targets of Intentional Harm

In the past 6 years, Europe's resilience was extensively tested, and key vulnerabilities were revealed: such as high economic dependence on global supply chains, on very limited energy supply sources and high dependence on more volatile partners for its defence.

Europe needs to take action and recognise the strategic role played by some of its championing industries, such as dredging, in military preparedness and the construction, maintenance and protection of coastal, offshore and subsea assets.

**EUROPEAN DREDGERS,
A RELIABLE AND SECURE EU STRENGTH IN A MORE UNPREDICTABLE WORLD**



Interesting times ...

In the words of the President of the European Commission von der Leyen II (vdLII), “*Europe is in a fight*” for its independence and for its core values, such as democracy and the rule of law. Indeed, in the last 6 years, Europe’s defences have been put under serious pressure: changing geopolitical context with logistics and supply chain disruptions due to COVID 19, with the war in Ukraine and with the tensions in the Middle-East. With this series of unprecedented global crises, Europe’s resilience was extensively tested, and key vulnerabilities were revealed: Europe’s economy is highly dependent on global supply chains, highly dependent on very limited sources for its energy supply.

Europe is to take drastic urgent action to reduce its high dependence for its defence on partners with increasingly more volatile interests and priorities and to guarantee the well-functioning of its supply chains, to develop reliable alternatives to fossil fuels and to secure peace through military preparedness (includes resilience to enemy action such as hacking, sabotage, bombing, ...).

The Commission vdLII has understood that without cooperation with the industry, the Green Deal cannot deliver. Therefore, the Competitiveness Compass (implementing the Draghi report recommendations) and

the Global Gateway are most welcome initiatives as they aim to reduce reporting burden on EU companies and boost European exports towards partner countries.

In these challenging times, dominated by uncertainty and risks, EuDA continued to work on its core priorities in 2025:

- 1) EU Ports and Maritime Industrial Strategies
- 2) Levelling the playing field inside and outside the EU
- 3) The EU Green Deal

EU Ports and Maritime Industrial Strategies

The EU Competitiveness Compass aims at reducing burden and costs on European companies but also at stimulating and enhancing their competitiveness.

As highlighted in the respective Draghi and Niinistö reports, the European waterborne ecosystem plays a pivotal role in the domestic economy, in critical supply chains and in security matters. Therefore, the Commission has launched two key initiatives for the waterborne activities: the EU Ports Strategy and the EU Maritime Industrial Strategy.

These strategies were prepared in coordination with the relevant stakeholders: in July 2025, Commissioner Apostolos Tzitzikostas consulted key maritime

industries and stakeholders for each of his strategies. These strategies will implement policies that aim at strengthening the competitiveness, sustainability and resilience of Europe’s ports and maritime manufacturing, shipping, inland waterway transport and offshore sectors. Moreover, **risks to physical infrastructure** from accidents and attacks and the impacts of climate change will be mitigated for ports. Finally, awareness needs to be raised with regard to the increasing foreign influence in ports.

In the Commission consultations, EuDA highlighted that both strategies are very relevant to dredging activities. The main strength behind the competitiveness of Europe’s waterborne cluster is the quality and density of its maritime economic fabric, allowing to continue to innovate, to develop skills and know-how. EuDA took the opportunity of these strategies to invite Europe to recognise the strategic character of dredging for ports and waterways and to safeguard, develop and promote this European knowledge, know-how and skill.

“There is no protection
in protectionism”

Jean-Claude Juncker

2025 Members of the EuDA Board

Marc Van den Broeck
(Chairman)



Kees van de Graaf
(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 Tancré
(DEME)



Andrea Vollebregt
(Vereniging van
Waterbouwers)



Levelling the Playing Field inside and outside the EU

- With the rise of protectionism around the globe, it is useful to remind people that the most competitive companies can only offer their higher productivity, higher quality and better value for money if they can access the markets and if the same rules apply to all competitors.
- This is why EuDA will always defend and promote the global level playing field. The level playing field is the most effective way to incentivise and reward excellence and promote quality, safety and sustainability. A biased market can reward uncompetitive companies, that are more likely to continue making losses, to keep standards low (delivered quality, working conditions, safety, environment), to make less innovation. Uncompetitive companies do not raise the bar higher, they make sure opposition cannot compete.
- The EU will be reviewing its Public Procurement Directives and EuDA is looking forward to seeing the

legislative gaps filled and to step up the level playing field in Europe.

The EU Green Deal

EuDA's work on the EU Green Deal in 2025 has focused on the EU Taxonomy and the implementation of ETS to offshore and dredging.

EuDA has identified key challenges with the EU Taxonomy and the most prominent is the non-eligibility of certain dredging activities under this legislation. This prevents European dredgers from deploying the full spectrum of their solutions and from using their skill and knowledge to contribute more sustainably to the taxonomy's climate change and environmental objectives. This limits the capacity of European administrations to deliver on the Green Deal's objectives with their waterborne infrastructure. EuDA's outreach with the European Commission Services is ongoing and progressing.

Europe ambitions to become carbon neutral by 2050 and targets to reduce its net greenhouse gas emissions by at least 55% by 2030. These ambitions were translated into laws and policy such as those included in the 'Fit for 55 Package'. In 2025, as a member of the Commission's expert group ESSF ETS-MRV, EuDA has been providing advice on how to implement the EU Emission Trading Systems to shipping, with its focus on offshore and dredging vessels. EuDA's advice, shared by the shipowners, aims at making the implementation of MRV-ETS practical and effective for offshore and dredging vessels.

It is not them and us, it is all about working together to achieve our mutual goals (people, planet, prosperity) in peace.

With our best regards,

**Marc Van den Broeck, Chairman
and his colleagues of the Board of EuDA.**

THANK YOU, Mieke!

More than 10 years ago, you joined the management team of EuDA and soon after you also took on the responsibility of independently controlling EuDA's accounts in the Verification Committee. EuDA's financial management was scrutinised with keen eyes paying attention to detail.

Mieke represented the dredging company Jan De Nul in the EuDA Board with her usual thoroughness. Her views and well-prepared feedbacks during the board meetings were appreciated over the years as well as her commitment to the dredging industry.

On behalf of your colleagues in the EuDA Board of Directors, we would like to thank you, Mieke, for your reliability and support to EuDA and to the EuDA Board.

We wish you all the best in your new endeavour and welcome your successor Mr Kobbe Peirs on board the deck of the EuDA ship.



Mieke Fordeyn
(Jan De Nul)

*Thank you, Mieke
Good luck to you and Farewell!*

Marc Van den Broeck
Chairman



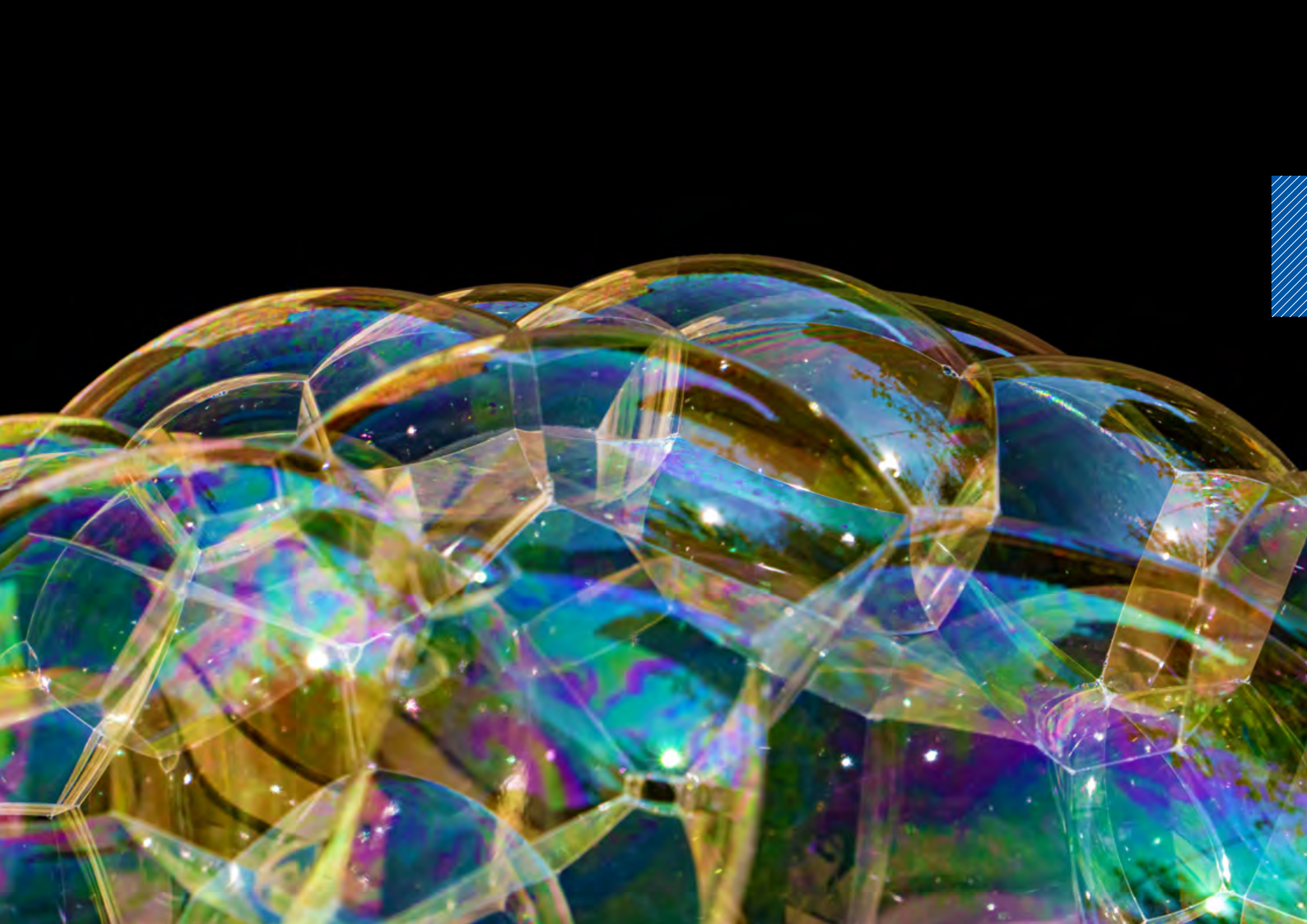


Securing against the Fragility of Trade, a divisive Coercion Instrument in Hybrid Warfare

With its Competitiveness Compass, the EU recognised that besides achieving or progressing towards its main environmental and societal objectives, a proper implementation of the Green Deal should also maintain, reinforce and, where necessary, improve both European global competitiveness and the global level playing field.

An indispensable prerequisite to achieve these is for the EU to recognise and incentivise the competitive advantage(s) of the European Industrial Champions, such as the Dredgers, without penalising them. Market-based measures should apply equally and evenly to all players active in the same market, regardless of their nationality or country of origin.

**EUROPEAN DREDGERS,
A RELIABLE AND SECURE EU STRENGTH IN A MORE UNPREDICTABLE WORLD**



In 2025, EuDA continued to tackle the unfair trade practices inside and outside Europe (such as competition distortions or market access restrictions) by non-EU State-owned Enterprises (SoEs) and focused its activities on further refining its European Trade Strategic Toolbox.

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. 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. The re-election of President Trump is generating widespread chaos on the global trade markets. The EU Trade Agreement with the US is only proposing reduced damage to Europe with no apparent gain.



Risks of Partial Nationalisation in Germany

Background

In 2016, the German Federal Government tendered the building of the “Osteriff”, a 7,500 m³ Trailing Suction Hopper Dredger (TSHD) to execute maintenance works of the Elbe river and expand the operations of its current State-owned TSHD the “Nordsee”, operating in the Jade river. The tender was awarded to Pella Sietas GmbH, a Hambourg-based shipbuilder. It is important to note that the works on the Elbe were then (and still are) procured via public tendering processes. Under these circumstances, a second TSHD operated by the German government would effectively **be closing 25% of its maintenance dredging market** and ultimately represent a form of nationalisation.



The Dredgers' Strategy

Since 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). VdN highlighted the importance of maritime transport for German trade and economic development, and, in particular, VdN convinced the German politicians and administrations of the strategic importance of maritime

infrastructures for shipping and of the strategic importance of dredging activities which provide vital services (maintenance, upgrading, expansion) to these infrastructures. 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. The German government confirmed that

2025 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, trade and international affairs, which can have a significant impact on the European Dredging Industry.

the new ship should normally replace the existing publicly owned vessel, 'Nordsee'.

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 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.

Issues with the Osteriff

The "Osteriff", the newbuilt ordered in 2016 to support the "Nordsee" (both ships were to operate in parallel in the initial government plans), has been facing severe delays (more than 7 years) and serious cost increase (50% budget overrun). Following the bankruptcy of the shipyard building the ship, an agreement was finally found to complete the ship (+/- 80% completed) at

the Blohm & Voss shipyard in Hamburg. The ship was completed in December 2025.

Thanks to the continuous and consistent awareness activities of VdN, the German Federal Budget does not foresee any new dredgers (only the completion of the "Osteriff") and the government confirmed that the ship should normally replace the 'Nordsee'.

Milestones in delivering the strategy

VdN has achieved the following 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;

- meeting regularly with key **members of the German Parliament** (Bundestag);
- joining forces with the **German construction industry** on common positions regarding unfair competition from Chinese SoEs.

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

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



Kobbe Peirs
MarCom Chairman
(Jan De Nul)



Hans Mooij
(Boskalis)



Robert de Bruin
(Van Oord)



Francis Verhees
(Jan De Nul)



Lennart Menger
(Van Oord)



Yves Cornardt
(DEME)



Robert Poelhekke
(NABU)



Paris Sansoglou
(EuDA)



Silvia Selandari
(EuDA)



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.

Overview of activities in 2025

In February 2025, the general elections took place. After that, the new German government (coalition between the the centre-right CDU/CSU and the centre-left SPD) was formed in May 2025.

The governing coalition agreed that maritime priorities would include a European maritime strategy to **strengthen the competitiveness** of *shipbuilding, shipbuilding suppliers and maritime technologies, and having a competitive port infrastructure, which also takes into account military and energy policy requirements*. The coalition agreement also foresees a national port strategy with a focus on deep-sea and inland ports.

Regarding the general relationship with China, the new German Government wants to cooperate with China while de-risking.

Next Steps

The new German government should pursue the policy of reducing Germany's dependency from Russia and China. In 2026, 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 (e.g. 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).

Identified Practices and their Impact

So far, EuDA has identified the following practices explaining the significant worldwide growth of the Chinese SoEs in the dredging market:

- **protection of the domestic market:**

Chinese SoEs execute the vast majority of the projects; the 2020 “dual circulation” policy, confirms that China views its domestic market as a possible source of renewed growth for its own companies, in addition to global trade;

- **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;
- **acquisition of 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 generalised and systematic use of the above mentioned unfair trade practices over the past ten years 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.

European Response, a Work in Progress

With the Chinese SoEs threatening many strategic European sectors, the EU needed to react decisively to ensure 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*”. 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*”. The upcoming revision of the Public Procurement Directives, announced by von der Leyen and foreseen for 2026, will offer the opportunity to explicitly clarify in the text of the directives that unless a country is a signatory of the WTO Government Procurement Agreement (GPA) or has signed a Free Trade Agreement (FTA) covering public procurement 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.

European vs National Competence

Romania was the first Member State to have translated this provision into national law which automatically rejects non-complying contractors from its public procurement market. However, in March 2025, the Court of Justice (ECJ) rendered its judgment on Case C-266/22, opposing the Chinese SoE CRRC to Romania for their exclusion from a railway tender. The ECJ made its final decision, whereby it specifies that where the EU has exclusive

competence (e.g. common commercial policy), Member States' law (e.g. the Romanian law) cannot restrict the scope of possible decisions (e.g. tender awards) foreseen in the European law. Moreover, in view of the revision of the Public Procurement Directives, the European Commission launched a public consultation. As a result of the public consultation, the European Commission has published an evaluation of the Directives.

The evaluation states that *“The procurement framework is [...] under pressure to accommodate new strategic priorities, such as economic security and strategic autonomy. Market access inequalities however persist, with non-European companies at times allowed to participate in EU tenders without European companies benefiting from reciprocal market access. Recent geopolitical developments underscore the importance of procurement legislation supporting strategic autonomy”*.

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 undesirable mergers and acquisitions.

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 2025

Building intelligence

In 2025, 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

transport, energy and communications 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 Trade Toolbox

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 Trade Strategic 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° a **guidance for 3rd country bidders' participation in EU public tenders** (2019);
- 2° the upcoming revision of the **Public Procurement legislation** to maintain and improve the level playing field in Public Procurement;
- 3° a **Maximum European Content Requirement** in all EU-funded projects (e.g. require a maximum of EU content for projects funded by the Connecting Europe Facility or the Global Gateway);
- 4° a **Foreign Subsidies Regulation** (adopted in 2022) to eliminate or reduce the current reverse discrimination of EU State Aid regulations not applicable to non-EU companies (including SoEs);
- 5° an **International Procurement Instrument** (IPI, adopted in 2022) to advocate reciprocity in market access;
- 6° an **Anti-coercion Instrument** (ACI – adopted in 2023) to protect the EU and its Member States from coercive external measures affecting trade and investment.
- 7° a **Diplomatic Action** to ask the third countries to remove their Market Access Barriers by using the network of embassies (for example Belgium, the Netherlands and Luxembourg) in these countries;
- 8° a revision of the Foreign Direct Investment (FDI) Screening Regulation to set up a **European FDI**

Control Agency (to monitor and intervene on unwanted acquisitions; to be developed);

9° a **Regulation on Trade Defence Instruments for Construction Services** (to provide *anti-dumping and anti-subsidies measures* for the construction sector, to be developed on the basis of the existing TDI for goods);

10° **minimum ethical, environmental and labour safeguards** (as described in the Green Taxonomy) applied to all EU financed projects (inside and outside the EU); effective enforcement of their own environmental, social and labour minimum requirements by EIB, EBRD, World Bank on all financed projects;

11° a **European Development and Export Bank** (to be established) that can coordinate development aid and export finance efforts (like the major EU competitors do, e.g. US, Japan, Korea, China).

In view of the revision of the Public Procurement Directives, EuDA contributed to the “Public Consultation” and the “Call for Evidence” of the European Commission, highlighting that dredging is strategic. Therefore, EuDA recommended that dredging services, with higher employment and sustainability standards compared to their non-EU competitors, should be given favourable treatment (European preference) in public procurement procedures.

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 2026, the main focus of EuDA will be on following up on the revision of the Public Procurement Directives and on the *ex officio* market investigation in the construction industry (including dredging) under the Foreign Subsidies Regulation.

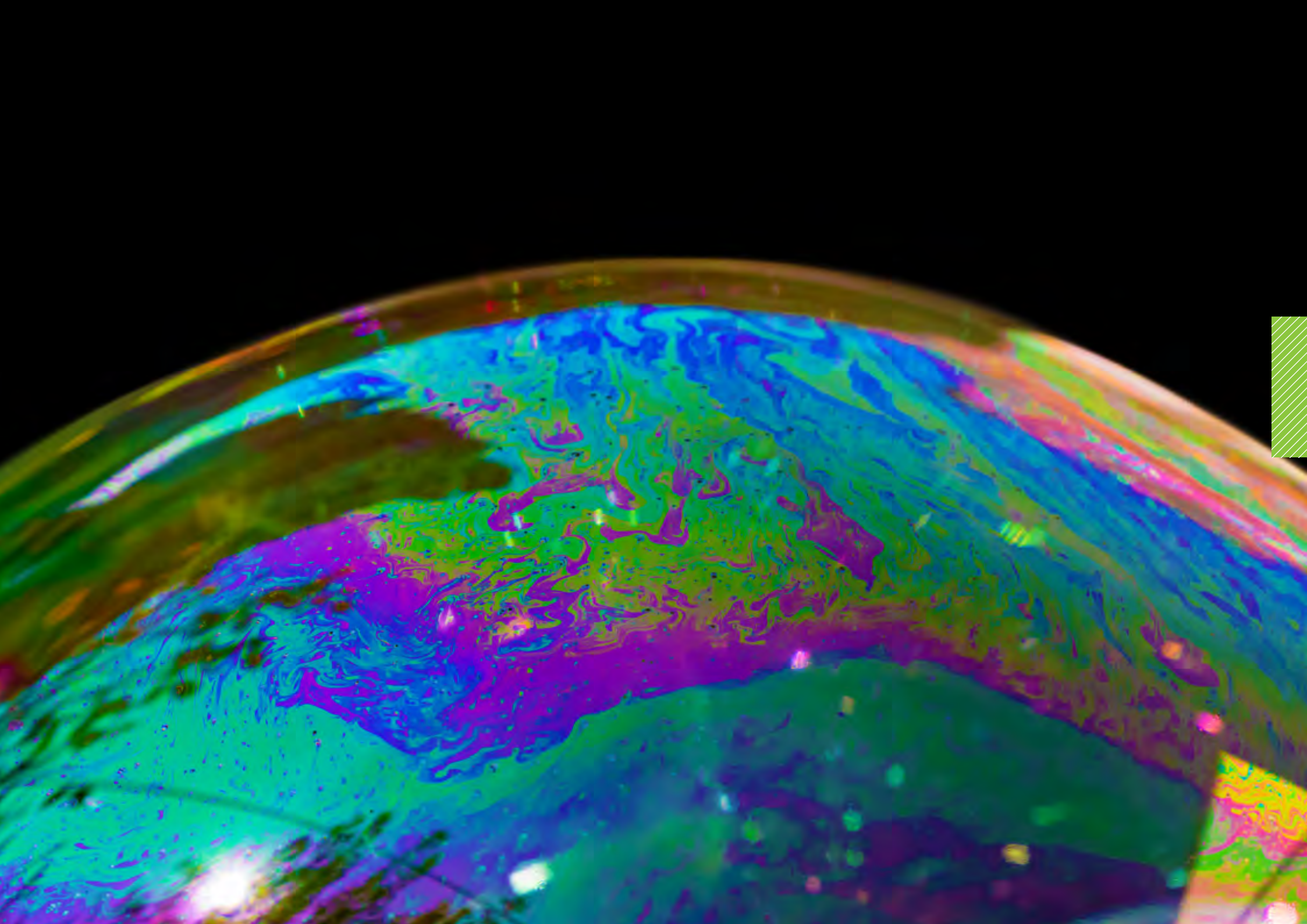
“Europe has realised that China is not only a cooperation partner, a negotiating partner and an economic competitor but also a systemic rival”

Securing against the Security Threats, adding Pressure on a fragile Environment Bubble

The Green Taxonomy's 6 objectives include climate change adaptation and mitigation, reducing pollution, achieving a circular economy and improving water quality and biodiversity.
Managing security threats adds a new dimension to this equation.

European Dredgers hold the key to building, upgrading, modernising, securing and maintaining sustainable waterborne transport and offshore energy infrastructure. Given a proper legislative framework, all their sustainability potential can be secured and further implemented.

**EUROPEAN DREDGERS,
A RELIABLE AND SECURE EU STRENGTH IN A MORE UNPREDICTABLE WORLD**



European Flagship Policy Frameworks

European Green Deal

Adopted in December 2019, under the *von der Leyen I Commission*, 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 (commitments under the Paris Agreement), decoupling of economic growth from resource use, and a just and inclusive transition 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.

EU Competitiveness Compass

In January 2025, in its second mandate, the *von der Leyen II Commission* published “**A Competitiveness Compass for the EU**”, which provides a strategic and clear framework for Europe to regain competitiveness and secure sustainable prosperity. Based on the Draghi report, the Compass requires both an administrative burden reduction and an increase in competitiveness. The Compass gives a central role to maritime activities and identified innovation, decarbonisation and security as the three core areas for action.

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**, 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.

¹ Regulation 2020/852 on the “establishment of a framework to facilitate sustainable investment”.

2025 Members of the EuDA Environment Committee

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)



Paul Vercruysse
(DEME)



Karel Allaert
(Jan De Nul)



Edgar van Oers
(Boskalis)



Harold Slump
(DD-DB)



Liesbeth den Haan
(Van Oord)



Mark Russell
(BMAPA)



Michiel Spitzer
(Vereniging van
Waterbouwers)



Paris Sansoglou
(EuDA)



Silvia Selandari
(EuDA)

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).

A new Platform on Sustainable Finance (PSF 2.0) was established in 2023 for two years. EuDA's membership

of the PSF was not renewed 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 fewer members and has shifted its priorities from the Technical Working Group towards **data availability and applicability**. Its mandate ended in 2025.

Dredgers' Issues and Lobbying Strategy

In 2021 and in 2023, the Commission proposed Delegated Acts (DA) to further implement the Green Taxonomy. These acts excluded "dredging of waterways" from taxonomy eligibility under waterborne infrastructures (6.16) in the DA on Climate Change Mitigation (CCM) and in the DA on Climate Change Adaptation (CCA). This was the result of a serious misunderstanding about dredging within the Commission.

EuDA established a dedicated lobbying strategy on the Green Taxonomy. As part of this strategy, EuDA met with DG FISMA in September 2023, made submissions to the FISMA consultation in December 2023 and organised a meeting with DG ENV Unit C1 for Sustainable Freshwater Management in 2024.

Moreover, Mrs Olazabal, the Head of Unit of DG ENV C1, was invited to the EuDA Annual Conference in 2024 and gave a keynote address on the Green Taxonomy (see coverage of the 2024 Annual Conference here after).

Another part of the strategy is to secure and maintain the support from DG CLIMA's Unit on Climate Change Adaptation Strategy (whose Head of Unit, Mrs E. Visnar, was speaking at our 2022 Annual Conference).

In 2023, EuDA approached the Directors General of DG FISMA, DG ENV, DG CLIMA and DG MOVE of the Commission. EuDA asked for clarification on 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 strategy is also considering alliances. EuDA is not alone and some experts from the administrations managing inland navigation infrastructures (INE-Inland Navigation Europe) share our views and concerns. Some of them have already started working on possible Technical Screening Criteria and asked to cooperate with EuDA.

In 2024, the Board decided to establish a EuDA task group on sustainability that would be tasked to develop a ‘EuDA Strategy on Sustainability’ and to deal with the Green Taxonomy issues of the dredgers.

EuDA Task Group on Sustainability

In 2025, EuDA established its Task Group on Sustainability (TG SUST).

EU Taxonomy

EuDA Reflection on the Green Taxonomy

In 2024, EuDA organised a workshop on the Green Taxonomy in which the EuDA members laid the groundworks for a EuDA Strategy on EU Taxonomy:

I. Lobbying

EuDA’s lobbying targets were defined as the following:

- a. to increase the scope of eligible dredging and related activities (e.g. *remove exclusion of dredging of waterways* from Delegated Acts on Climate Change Adaptation and Mitigation, under 6.16 and shift towards “**dredging is always eligible with some exceptions that relate to specific industries**”);

NB: eligibility is only the first step. The main challenge is “alignment” where DNSH criteria will have to be fulfilled.

- b. to make GT simple to use and implement (e.g. *list all enabled activities by dredging that are excluded from GT, the remaining would be GT eligible*).

II. A Sector Guidance

Due to a lack of clarity on eligible dredging and related activities, the validation of eligibility and

alignment of dredging and related activities by financial auditors is quite burdensome, time-consuming and costly.

Therefore, a **EuDA guidance document may be needed to clarify** the definition of the dredging and related activities, clarify the data and information gathering processes for validating their eligibility, identify technical criteria to demonstrate their alignment (thereby improving certainty and predictability for the companies and reducing their administration costs).

III. Technical Screening Criteria

Finally, the group confirmed that **GT alignment is an individual exercise** and should be left to the companies. However, there is common interest in the establishment of practical and achievable technical screening criteria (TSC), which will be used to assess alignment with GT.

2025 Members of the TG SUST

The Task Group on Sustainability (TG SUST) was established by the EuDA Board as a temporary task group with a clear focus and limited duration reporting directly to the EuDA Board. The TG SUST was tasked with establishing EuDA's Lobbying Strategy on Sustainability, identifying issues with the most relevant sustainability-related EU policies and legislations applicable to the European Dredgers (e.g. EU Taxonomy) and by providing the EuDA Board with expert advice on their possible impacts and the risks they represent for the sector.



Paris Sansoglou
(Chairman, EuDA)



Jiska Verhulst
(DEME)



Marielle Scalé-Goettsch
(Boskalis)



Hannelore Ruytjens
(Jan De Nul)



Rachel Terry
(Van Oord)



“Dredging activities should be taxonomy eligible with some exceptions that relate to specific industries.”

2025 Consultation on TWG Report

In 2025, the Technical Working Group (TWG) of the Platform on Sustainable Finance (PSF 2.0) published a draft report on preliminary recommendations for the review of the Climate Delegated Act and the addition of activities to the EU Taxonomy. This report provided a unique opportunity to open a comprehensive discussion with the Commission on EuDA's main issue: indeed the report revealed that the exclusion of dredging under the chapter 6.16 in Annexes I & II (*Infrastructure for water transport*) was not unanimously supported by the TWG experts. A note on p. 127 stated that:

*“Some Platform members are of the view that the **dredging activities are an integral part of the activity and therefore should not be excluded** – this requires further analysis to conclude on this point and either retain or remove the exclusion.”*

Therefore, EuDA submitted a contribution to the European Commission in February to confirm the need to remove the exclusion of dredging from the EU Taxonomy Delegated Acts on Climate Change Adaptation and Mitigation, 6.16.

Meetings with the Commission (DG MOVE, DG FISMA and DG ENV)

With the support of TG SUST, Jiska Verhulst (DEME member of TG SUST) made a presentation in September

2025 to the Commission's DG FISMA (DG Financial Markets in charge of the EU Taxonomy). Other experts were also invited, including an expert from INE (Inland Navigation Europe, managing waterways). In general, the experts and officials present understood and agreed with the points made by the dredgers, namely:

- the construction, modernisation and maintenance of infrastructure enabling low carbon water transport should include dredging activities, including maintenance (with clear Technical Screening Criteria (TSC) for Substantial Contribution (SC) and Do Not Significant Harm (DNSH));
- the construction, modernisation and maintenance of adapted waterborne transport infrastructure should also include dredging activities.
- **dredging activities** are considered **as enabling activities** for infrastructures
- the Commission establishes a dedicated Sector Team to develop ad hoc TSCs for dredging as an enabler for Adaptation and as an enabler for Mitigation.

Omnibus Packages

Reducing Burden through Simplification

In February 2025, the European Commission adopted the first of the so-called '**Omnibus Packages**', which aims at better integrating the EU's policies on competitiveness and on climate. The Omnibus is simplifying the EU

requirements on sustainability reporting and due diligence. To boost EU competitiveness, the EU is reducing the reporting burden of the directives on Corporate Sustainability Reporting (CSRD) and Due Diligence (CSDDD).

Increasing European Competitiveness through Maritime

In addition to reducing burden and costs, the European Commission has launched new initiatives to stimulate and enhance European competitiveness. The Commission has launched two initiatives with regard to maritime activities: the **EU Ports Strategy** and the **EU Maritime Industrial Strategy**, both very relevant to dredging activities.

These Strategies recognise that the **European waterborne ecosystem** plays a pivotal role in the domestic economy, critical supply chains and security matters (as highlighted in the Draghi and Niinistö reports). The current complex and volatile global developments present significant competition and security challenges for the EU waterborne ecosystem, which is particularly vulnerable to them due to its international character.

In this context, the upcoming EU Strategies will aim to strengthen the competitiveness, sustainability and

resilience of Europe's ports and maritime manufacturing (including shipbuilding, ship repair, retrofitting and maritime and port equipment manufacturing), shipping, inland waterway transport and offshore sectors. For ports, **risks to physical infrastructure** from accidents and attacks and the impacts of climate change should be mitigated. Awareness needs to be raised as regards to the increasing foreign influence in ports.

High-level Strategy Meetings with Commissioner Tzitzikostas

Commissioner Apostolos Tzitzikostas organised two High-Level Dialogues, combined with standard consultations, with key maritime stakeholders to discuss the focus and priorities of the new EU Maritime Industrial Strategy and the EU Ports Strategy.

On both occasions, EuDA highlighted that

- *the key strength of the competitiveness of Europe's waterborne cluster is the quality and density of its economic fabric, allowing it to continue to innovate, to develop skills and know-how;*
- *Europe should make an inventory of its 'maritime crown jewels' and determine which strategic technologies, sectors, knowledge are essential to **its current and future functioning and autonomy** (economic, societal and environmental);*

- *the competitiveness of ports is influenced by their connectivity (to key import/export markets), by their infrastructure (waterborne transport and hinterland, logistics, industrial hub in ports, ...) and by their resilience to climate change (adaptation), accidents (safety) and attacks (security). Therefore, the EU's actions should focus on ports' infrastructure, connectivity and resilience;*
- *Europe should recognise the strategic character of dredging for ports and waterways and to safeguard, develop and promote this European knowledge, know-how and skill.*

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.

Short-Term Impacts within the Water Framework Directive (WaterFD)

In a 2023 judgement (case C-525/20), the European Court of Justice (ECJ) confirmed that activities having temporary, short-term impacts which are without lasting consequences, have to be taken into account in the (environmental) authorisation procedure.

As it appears, most Member States will not achieve their objective of good (water) status by 2027 under the WaterFD (Directive 2000/60/EC). This situation, combined with the 2023 ECJ judgement (C-525/20) and WaterFD principles, led some Member States, such as The Netherlands, to consider that no deterioration, even temporary, should be authorised anymore. This overly strict interpretation could lead to unduly forbidding certain activities, such as dredging,

that cause temporary deterioration without lasting consequences. By forbidding dredging activities, all the solutions offered by the dredging activities to add value to the environment (e.g. Nature-based Solutions, habitat restoration, flood and storm protection, riparian and coastal protection) would also be forbidden as a consequence.

In its position paper, EuDA demonstrates that **dredging activities are not only compatible with the WaterFD but also necessary to achieve some of the WaterFD goals**. EuDA will pursue the constructive dialogue between the European and national administrations and the dredging sector to identify the relevant metrics and approaches to improve water quality.

Filling the Gaps with the Marine Strategy Framework Directive (MSFD)

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.

In the Green Taxonomy, one of the environmental objectives is the sustainable use and protection of water and marine resources.

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. A similar approach should be implemented with the Green Taxonomy with all relevant DGs around the table: e.g. for waterborne transport a joint working group between DG MOVE – DG ENV – DG CLIMA. In the Green Taxonomy, one of the environmental objectives is the protection and restoration of biodiversity and ecosystems.

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.

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 focus included 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"*.

In the Green Taxonomy, one of the environmental objectives is the transition to a circular economy.

**"In the majority of cases,
dredged material is
not a waste
but a resource
to put to beneficial use."**

EUDA 2025 ANNUAL CONFERENCE (21 NOVEMBER 2025)

EU'S WATERBORNE CRITICAL INFRASTRUCTURE: FACING NEW GLOBAL CHALLENGES, RISKS AND THREATS

Conference Overview:

With a series of unprecedented global crises in the last 6 years, Europe's resilience was extensively tested, and key vulnerabilities were revealed: Europe's economy is highly dependent on global supply chains, highly dependent on very limited sources for its energy supply and highly dependent for its defence on partners with increasingly more volatile interests and priorities.

Europe needs and has started to take action to guarantee the well-functioning of its supply chains, to develop reliable alternatives to fossil fuels and to secure peace through military preparedness. Military preparedness includes resilience enemy action (hacking, sabotage, bombing, ...).

In its 2025 Annual Conference, EuDA focused the discussions on the critical waterborne infrastructures. Oceans and rivers infrastructures for transport, offshore energy and subsea communication need to be secured, upgraded and maintained for dual use (both civil and military) to withstand the consequences of climate change as well as the consequences of actions of intentional harm or enemy action. Policy makers, Experts and specialists presented their views and experience regarding the newly identified risks and threats that Europe's waterborne infrastructures are facing and highlighted the key role of the European dredgers in building, maintaining and protecting them as well as increasing their resilience to the newly identified risks and threats. The audience also engaged in constructive and meaningful exchanges with the speakers during the open discussion.

EUDA'S 2025 ANNUAL CONFERENCE

Welcome and Conference Opening

Mr Marc Van den Broeck, EuDA Chairman,
Event Host

Mr Paris Sansoglou, EuDA Secretary General,
Conference Moderator

Setting the scene

New Geopolitical Challenges, Risks and Threats to Europe's Critical Infrastructures

Ms Melina Lê, Deputy Chief of Staff and Policy Advisor, Flanders Ministry of Mobility, Public Works, Harbours and Sport

Dual Use Requirements

New Military Requirements and Expectations from European Infrastructure

Dr Lemonia Tsaroucha, NATO Defence Enablement and Resilience Directorate, Resilience Section

The EU's Plans, Strategies and Actions

Overview of the European Strategies for Security-resilient Waterborne Infrastructure

Ms Fotini Ioannidou, Director for Waterborne Transport European Commission, DG MOVE

Example of Strategic Dredging Project

Strategic & security challenges of the construction of the Princess Elisabeth Island

Mr Pierre-Yves Guillermin, Elia Group, Project Manager Princess Elisabeth Island

Open Discussion and Conclusions

NB: more detailed key messages available online (<https://www.european-dredging.eu/Events>).

The Conference's key messages:

Host Welcome: Interesting times ...

- New, and less new, Global Challenges are threatening Europe's environment, economy and defence.
- Europe is reacting with concrete policies and actions such as the Green Deal, the Competitiveness Compass and the Global Gateway.

Belgium: New Geopolitical Challenges, Risks and Threats to Europe's Critical Infrastructure

- Critical infrastructures provide key functions to a particular country's economy, society and environment and play an essential role in that country's ability to achieve resilience and sustainability. As roads are overused, infrastructures for rail and waterborne transportation become even more strategic.
- Governments have a key responsibility with regard to these Critical Infrastructures.
- Dredgers provide critical services to waterborne infrastructures and governments that mitigate climate change, adapt infrastructures to a changing environment, maintain and protect crucial infrastructures (incl. subsea cables and pipelines), ultimately building economic resilience.

NATO: New Military Requirements and Expectations from European Infrastructure

- **NATO's Resilience & Enablement Objectives** include military preparedness and war readiness, which require careful planning and proper execution of rapid reactions in case of crises or conflicts. Europe's warfighting readiness needs support because of the evolving nature of its threats, e.g. hybrid attacks.
- **Ports are strategic nodes for civilian and military transport and logistics activities**
 - o it is essential to ensure the resilience of port infrastructure and operations; the same goes for the **continuity** of Government, Essential Services, of Civilian Support to the Military and therefore NATO prepares and protects both society and infrastructure.
- Sovereign control over assets such as ports can lead the sovereign actor to make a dual use of these common ports (e.g. China in Piraeus).
- Dredging is critical for military mobility.

European Commission: European Strategies for Security-resilient Waterborne Infrastructure

- The European Commission is providing legal and political frameworks (e.g. the EU "Military Package" and the EU Competitiveness Compass) to stimulate the transformation of infrastructures to the new global requirements.
 - o The European Commission is preparing two strategies dedicated to maritime activities: the **EU Ports Strategy** and the **EU Maritime Industrial Strategy**, which would be published by March 2026.
- As hubs for connectivity, industry and energy, ports are key infrastructure for Europe's Competitiveness, Green Transition and Strategic Autonomy.
- Therefore, Europe needs to pay attention to ensure
 - o a balanced approach to **foreign ownership** of ports;
 - o **investments** that will preserve economic security, European know-how and level playing field;
 - o key services, such as **dredging**, that will keep them accessible and fit for purpose.

Project: Strategic & security challenges of the construction of the Princess Elisabeth Island

- Fundamental shifts are expected in the coming decades (significant increase of the share of electricity and of renewable in total energy mix).
- The creation of the artificial energy island, the Princess Elisabeth Island, along the Belgian coast will contribute to further the electrification of the Belgian and European energy mix.
- In this offshore environment, there are some particular security challenges, such as:
 - exposure to smuggling, stowaways, environmental organisations, daredevils, ...
 - fast changing (international) security landscape and the increased risk of terrorist attacks, sabotage, unauthorised people, acts of war.
- Tackling these risks and challenges, Elia used
 - a holistic approach (People-safety, Infrastructure, assets & IT) adapted to the corporate risk framework (matrix probability ~ impact);
 - **asset security measures**, with specific electronic measures in place (such as radar detection, thermal camera's, ... as well as remote monitoring 24/7) focusing on the security of access points and critical assets;
 - **under water security measures** cover cable security (with optical fibre monitoring, Dynamic

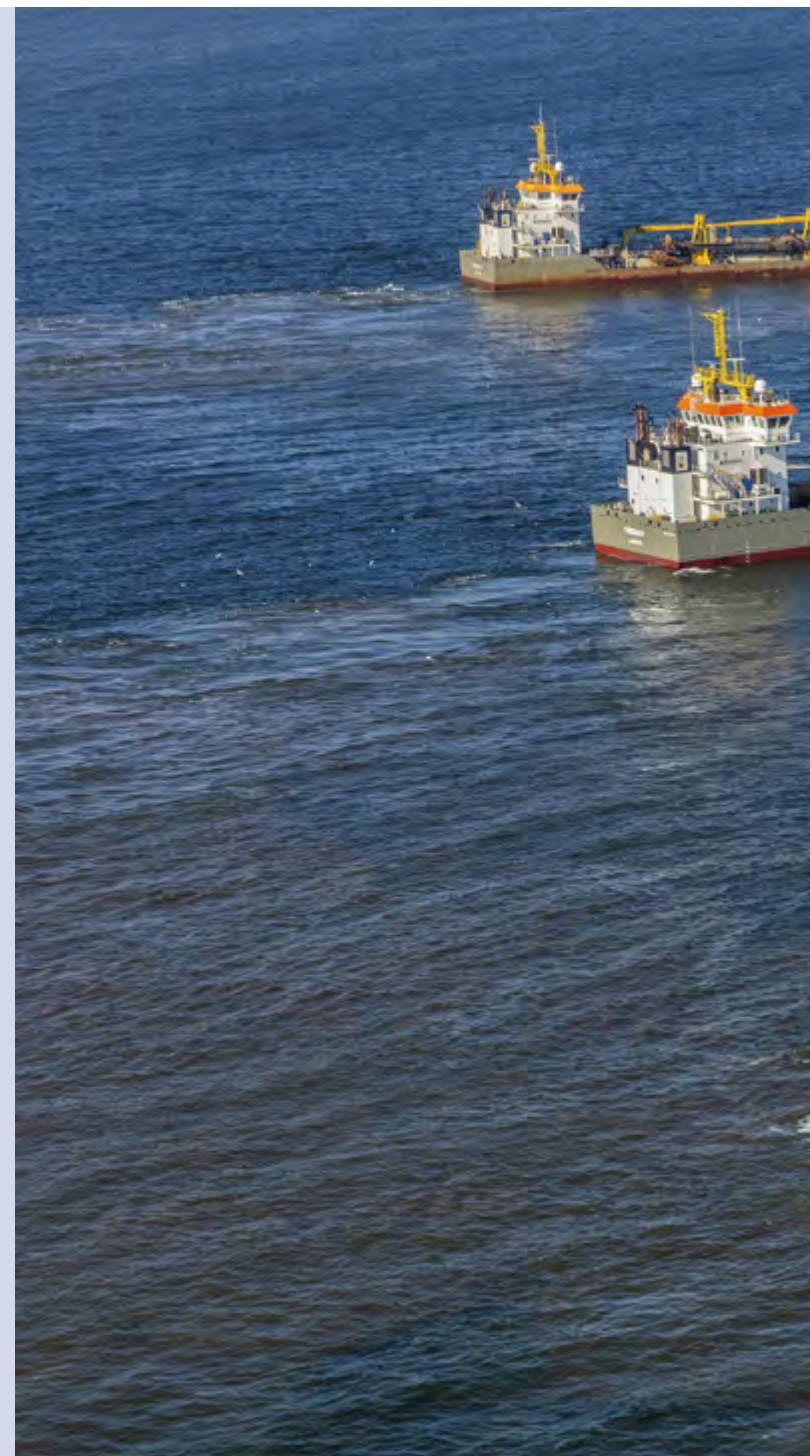
Acoustic System-DAS, vessel monitoring within cable corridors and Automatic Identification System-AIS); moreover, Elia also uses underwater drones for security;

- **above water and air security measures** are implemented through drone-detection / drone neutralisation.

Messages to take home

- In a **fast changing global security landscape**, there are increased risks of terrorist attacks, sabotages, acts of war. Citizens and critical infrastructure need to be protected from these risks as well as from the threats from Climate Change.
- **Ports are strategic transport and logistics nodes**
 - ports constitute an essential network for civilian and military activities;
 - ports need to remain fit for (dual-use) purpose (accessibility, continuity and resilience/adapted).
- Europe has a key role to play in **regulating service providers to critical infrastructure** and incentivising **key measures to secure its Strategic Autonomy**.
- **European Dredgers** provide a unique set of services to critical infrastructure for transport, energy and telecommunications and are **recognised by the critical infrastructure owners as strategic partners**.

NB: more detailed key messages available online (<https://www.european-dredging.eu/Events>).





PARTICIPANTS AND GUESTS AT THE EUDA 2025 ANNUAL CONFERENCE

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



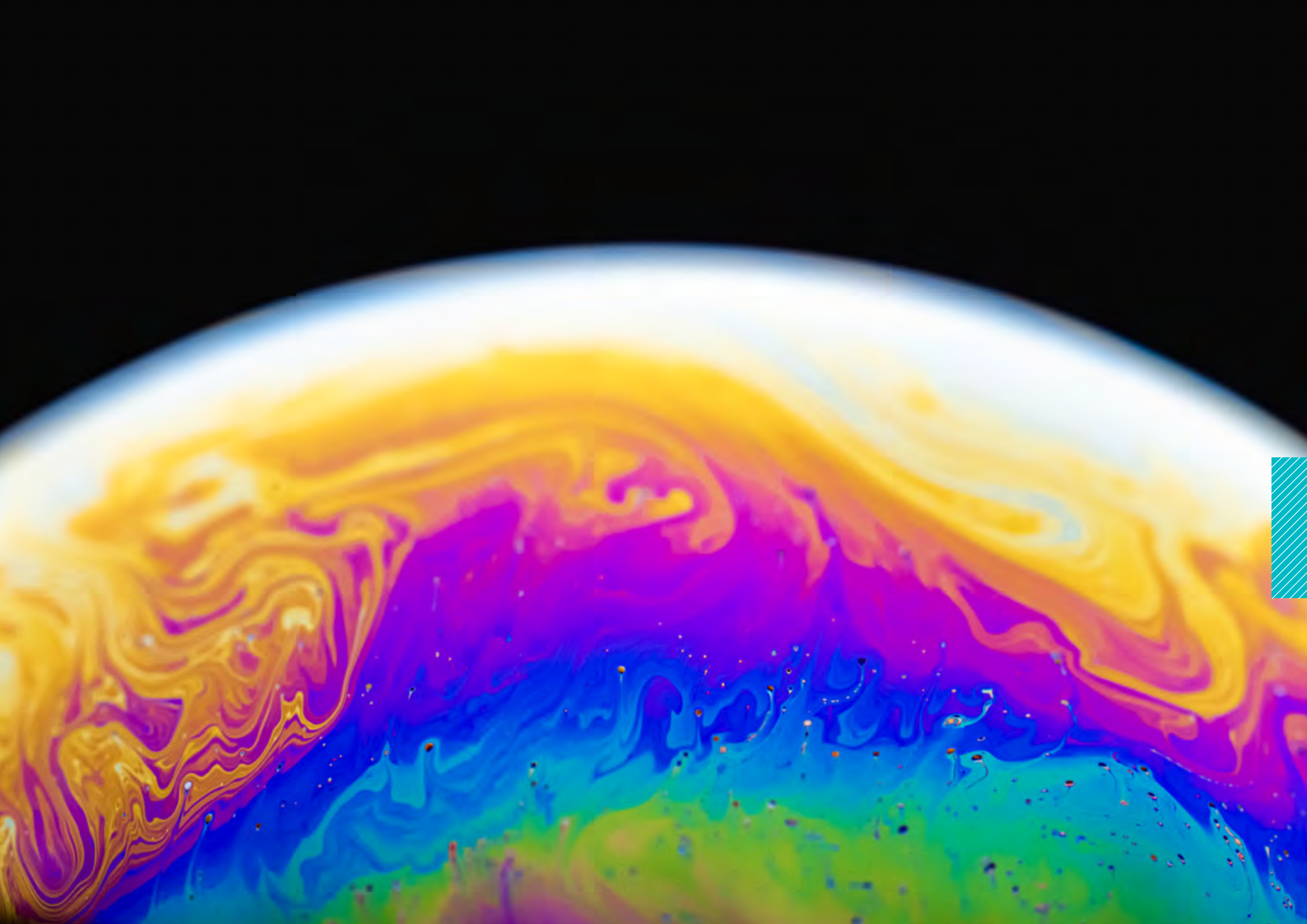


Securing against the Fragility of EU's most exposed Coastal Assets and Protecting them

European Dredgers have evolved over the past 30 years from 'pure dredgers' to global solutions providers for waterborne transport and energy infrastructure with a broad range of diversified activities.

The technology, skills and know-how they have developed over these decades allows them to provide innovative sustainable solutions to build, secure and/or protect our most exposed coastal and offshore assets, so critical to our European economy.

**EUROPEAN DREDGERS,
A RELIABLE AND SECURE EU STRENGTH IN A MORE UNPREDICTABLE WORLD**



From its inception in 2009, the **EuDA Emissions Working Group** (EmWG) worked towards establishing and implementing the EuDA common **CO₂ Strategy**. The Strategy has improved EuDA's internal understanding of its dredging fleet's CO₂ emissions and allowed to better communicate externally towards European and international public administrations and relevant stakeholders. Since 2017, the scope of this working group was enlarged to cover, besides CO₂ emissions, all other emissions from dredging vessels.

With the consistent promotion of its CO₂ Strategy, through position papers, consultations, presentations, specialised articles, meetings, EuDA continuously raises the awareness of officials and representatives from the European Commission, the European Council (through the Member States) as well as from the IMO on the views and main recommendations of the European Dredgers with regards to CO₂ matters.

In 2025, EuDA pursued the implementation of its CO₂ Strategy and focused on the 'Fit for 55' legislative package, in particular on the implementation of the EU ETS-MRV¹ to shipping and the FuelEU maritime. Participation in the European Sustainable Shipping Forum (ESSF) was crucial in exchanging information and views with the Commission and the Member States. EnvCom also follow-up the developments in IMO (Data Collection System).

Within its CO₂ Strategy, EuDA has also 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 CO₂ Strategy

The first objective of the CO₂ Strategy has been to build a better understanding over the CO₂ emissions from the EuDA dredging fleet. To do so, EuDA established a procedure and methodology for the collection of raw data for the calculation of CO₂ emissions.

Industry-backed calculation method for CO₂

The implementation of the EuDA CO₂ 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



¹ EU Directives on Emission Trading System (2003/87/EC) and on Monitoring, Reporting and Verification (EU/2015/757).

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 the 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 CO₂ emission figures 2024

As part of the EuDA CO₂ Strategy, EuDA has been collecting data for the CO₂ 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 CO₂ emissions but also NO_x, SO_x, N₂O, 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.

Main dredging projects' drivers

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 various drivers are not correlated with each other, the dredging sector is characterised by a certain level of acyclicity (or a resilience to economic cycles) that translates into a reasonably steady growth.

After three years of decline, the turnover generated by projects in *capital dredging and offshore energy* has bounced back in 2024. Turnover from urban and tourism related projects has grown steadily since 2021 and both drivers listed top for dredging projects in 2023 and 2024. Regarding *maintenance* projects, they have been relatively stable in the past years.

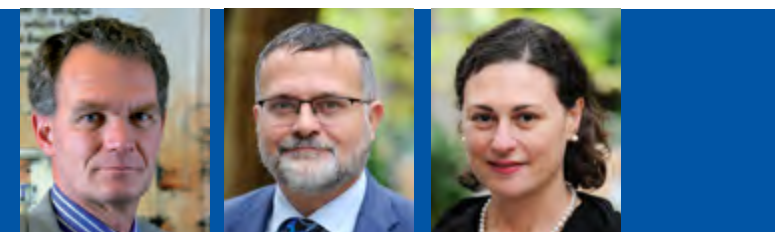
Drivers for the EuDA fleet CO₂ emissions

The evolution of the EuDA dredging fleet's emissions is the result of mainly three drivers:

- 2 performance drivers: technology and operational processes;
- 1 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 CO₂ emissions per m³ of dredged material.

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



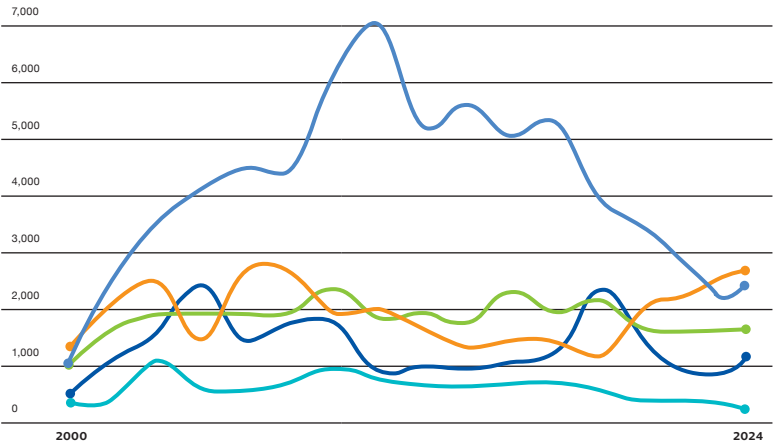
René Kolman
(IADC)

Paris Sansoglou
(EuDA)

Silvia Selandari
(EuDA)

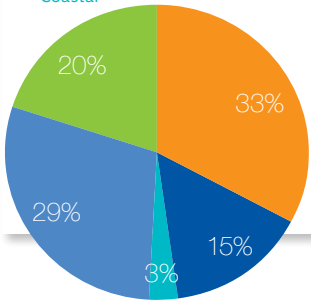
Graph 1:

Dredging Turnover per driver (2024) *source: IADC - EuDA*



2024 SHARES
PER SEGMENT

Trade Capital
Urban & Tourism
Trade Maintenance
Energy
Coastal



It is important to highlight that reduction of CO₂ emissions per m³ 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).

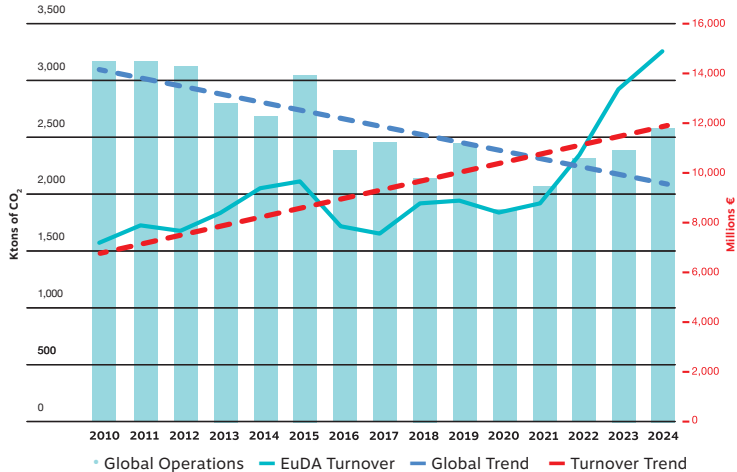
With regard to the individual **Market Drivers**, they can work both ways: they can either reduce emissions or they can increase them. The **overall absolute emissions** result from the balance between those drivers (net reduction or net increase).

Evolution of the EuDA fleet CO₂ emissions

As illustrated in the graph 2, the general trend of the EuDA dredging fleet emission is downward. However, the graph shows isolated peaks of emissions, which reflect activity surges for dredging projects, such as in 2015 for the expansion of the Panama and Suez Canals, when the emissions soared to 3.0 Mton. In 2010, a similar peak occurred in Europe following the reclamation of Maasvlakte 2 in the Netherlands. These peaks also demonstrate that the impact of an increase of economic activity on the absolute emissions is negative (compensating the efficiency improvements)

Graph 2:

Evolution of CO₂ emissions and Turnover of the EuDA Fleet (2010-2024) *source: EuDA*



and that the surge of activity slows down the absolute emissions reduction and can even lead to their overall increase.

Following the significant reduction of activity levels due to COVID, EuDA's global emissions in 2020 decreased below 1.9 Mt, the lowest level on record so far. Since 2021, EuDA's global emissions grew above the symbolic 2 Mt. For the past 10 years, the level of CO₂ emissions in Europe by the European Dredgers is staying between 600-800 ktons of CO₂, below 2008 (880 ktons).

¹ 11 billion Euro from 2008 to 2017.

NB: regarding the entire dredging fleet, when EuDA started collecting emission data for its fleet, it was estimated in 2008 that the total world seagoing dredging fleet produced 6.3 Mton of CO₂, of which the European dredgers (members of EuDA) produced 3.4 Mton.

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 proposals and initiatives on climate, energy (fuels), transport, buildings (heating), land use (forestry) and taxation (trade). This major policy and legislative package drives towards achieving a net reduction of greenhouse gas emissions: under the European Climate Law, EU Member States committed to becoming climate-neutral by 2050 and to reduce the EU's net emissions by at least **62% by 2030**, compared to 1990 levels in a fair and competitive way, by applying the 'Polluter-Pays' principle. Where possible existing legislation was reviewed and made more ambitious. Where needed new proposals were prepared and implemented: this target also applies to emissions from maritime transport, which have been included in the EU ETS from 2024. Moreover, the European Parliament has mandated DG CLIMA to include offshore (and dredging) vessels in the ETS-MRV legislations.

Table 1: EuDA fleet CO₂ emissions (2008-2024) source: EuDA

EuDA Sea-Going Fleet			
Global operations	Installed power MW	Fuel consumption kton	CO ₂ emissions kton
2008	1,510	1,090	3,440
2010	1,591	999	3,155
2015	1,298	959	3,033
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	722	2,285
2023	1,374	741	2,365
2024	1,215	806	2,569
European operations	Installed power MW	Fuel consumption kton	CO ₂ emissions kton
2008	420	280	880
2010	654	420	1,326
2015	409	223	713
2018	485	238	763
2019	500	214	682
2020	605	255	817
2021	487	219	701
2022	598	237	760
2023	541	192	615
2024	296	158	506

The Social Climate Fund (SCF) was created to address the social impact of carbon pricing in the sectors covered by ETS, making sure vulnerable citizens are not left behind in the green transition. The SCF will mobilise EUR 86.7 billion from the ETS revenue in the 2026-2032 period.

“In 20 years, the CO₂ performance of European dredging vessels improved on average by 15%.”



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;
- as from 2024, the EU MRV will cover **methane (CH₄) and nitrous oxide (N₂O)** (coverage by the EU ETS as from 2026);
- ships' emissions should be cut by 2% as of 2025 and by 80% as of 2050.

Main issue

There is no clear and practical definition of dredging vessels nor offshore vessels in the European law. So clarification is needed.

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 at their own risks.

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.

2024 DG CLIMA Consultation on MRV-ETS DA proposal

In 2024, the Commission organised a Stakeholder consultation on its draft Delegated Act (DA) on the **inclusion of offshore vessels** in the ETS for shipping. EuDA and the other associations concerned, such as ECSA and IMCA, highlighted the lack of clarity regarding the **definition of offshore vessels** in EU law. EuDA also highlighted the lack of clarity regarding dredging vessels. Besides, there is still no clear definition of “port of call” in combination with “crew change” and “voyage” for the offshore and dredging vessels.

On 08/07/2025, EuDA contributed to the Commission's public consultation on simplifying and improving the administrative burden of ETS reporting. EuDA emphasised the big operational differences between shipping and working vessels, the need to clarify the remaining issues with dredging and offshore, the need for more consistency between the Fit for 55 legislations (e.g. ETS TtW and FuelEU WtW) and also with the IMO Net Zero Framework. EuDA also highlighted the possible competition distortions for the offshore and dredging vessels because of the existing loopholes and unclarity in the definition of “port of call” in combination with “crew change” and “voyage”. EuDA proposed some ways to improve the situation.

EuDA will follow very closely the developments and contribute through the Commission's dedicated working group on implementing ETS to maritime transport (under the European Sustainable Shipping Forum, see hereafter).

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. EuDA is a full member of the ESSF since 2019. EuDA is member of the sub-groups working on Ship Energy Efficiency (SEE), on Sustainable Alternative Power for Shipping (SAPS) and on implementing the EU regulations on Monitoring, Reporting and Verification (MRV) and on Emissions' Trading System (ETS) to shipping.

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 the 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, including matters on **alternative sustainable low- and zero-carbon fuels and propulsion methods**, with a view to improve 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.

Implementation of the ETS and MRV Maritime (ETS-MRV)

In 2024, a new ESSF Sub-Group on the Implementation of the Emissions' Trading System - Monitoring, Reporting and Verification to Maritime Maritime (SG on ETS-MRV) was created for stakeholders' and Member States' experts to discuss, provide expertise to the Commission, and develop guidance documents.

The main tasks of the SG ETS-MRV are:

- (a) to establish cooperation and coordination between the Commission, Member States and stakeholders on questions relating to the implementation of the EU ETS Directive and the MRV Maritime Regulation;
- (b) to assist DG CLIMA in the preparation of guidance (including updates to existing guidance), recommendations for standards, best practices and other documents relevant for the implementation of the EU ETS Directive – insofar as maritime transport is concerned – and the MRV Maritime Regulation, as deemed relevant.



In 2025, DG CLIMA organised several joint meetings of the ESSF ETS-MRV SG with the CCEG. Regretfully, despite an overwhelming consensus between stakeholders and Member States on the offshore elements, DG CLIMA seemed to follow another source of recommendations (more legalistic than practical) when implementing MRV-ETS to dredging and offshore vessels.

Joint meetings with DG CLIMA Expert Group

As a member of ESSF SAPS and ETS-MRV, EuDA, is invited to joint meetings between the Climate Change Expert Group (CCEG) of DG CLIMA and ESSF SAPS to discuss the practical details of the extension of ETS to shipping. The exchanges are open and constructive. EU and Member States' Officials and industry representatives (KVNR, KBRV, ECSA, ICS, ...) were participating (in person and on-line).

In 2025, DG CLIMA organised several joint meetings of the ESSF Sub-Group on ETS-MRV with the Climate Change Expert Group (CCEG). There the discussions cover many aspects of the ETS implementation to shipping, including the inclusion of the offshore vessels in the ETS-MRV (as decided by the European Parliament in 2023).

Monitoring, Reporting and Verification and Emissions' Trading System to Maritime (MRV-ETS) Workstream on Offshore (and Dredging)

In 2025, the Commission created a workstream dedicated to the implementation of MRV-ETS to the Offshore vessels (WS Offshore). In this workstream, there is a significant participation of dredging representatives: **EuDA** is a **member** while Vereniging van Waterbouwers (VvW), Boskalis, DEME, Jan De Nul and Van Oord are observers. Most of them are members of the EuDA Emissions Working Group and are also members in similar working groups at VvW, KVNR, KBRV and IMCA.

The kick-off meeting took place on 11/02/2025. A group of stakeholders, including dredgers, shipowners and marine contractors, quickly agreed on the main issues with the implementation to offshore and dredging vessels: **the definitions and concepts, initially designed for shipping, do not apply to working vessels**. The group worked together and identified possible short-term solutions such as definitions (e.g. port calls,

“Dredging and offshore vessels use energy to both sail and work at sea.”





voyages, crew) and possible long-term solutions such as the general approach to offshore (activity-based approach). The common feedback was transmitted to the Commission (DG CLIMA, chairing the workstream).

EuDA, ECSA and IMCA then prepared a joint position to express their views on how to implement MRV-ETS to dredging and offshore and sent it to DG CLIMA. EuDA, ECSA and IMCA then presented their joint paper during a meeting of the ESSF WS Offshore. The key issues at the centre of our requests and recommendations include the unclarity about the vessels' definition and the loopholes regarding the level playing field. For once, the represented associations had the impression of being listened to and given sufficient time to discuss the issues and explain the arguments for their recommendations. However, in the last draft of DG CLIMA Guidance Document 1 (GD1), the general guidance on the implementation of EU ETS-MRV to shipping did not show any uptake of the discussions. The stakeholders expected the long term solutions to be taken into account and DG CLIMA did not intend to start the revision of the law (before 2026).

IMO agreement on GHG emissions delayed

Since the 2015 Paris Agreement, IMO had worked towards reducing GHG emissions from shipping. After successfully implementing technical and operational

measures, the last step was the market-based measure. IMO managed to define a **first global pricing mechanism for emissions**, which along with financial incentives, would encourage shipping companies to use the cleanest fuels and technologies early on. The pricing mechanism would apply to a share of international shipping emissions from 2028, with an initial price of USD 100 per tonne of CO₂.

With the full weight of the US administration and the other main oil producing countries, a counterattack derailed the years long negotiated IMO agreement on ships' emissions. Despite having reached in April 2025 an agreement towards achieving net-zero emissions from global shipping by 2050, the IMO Plenary could only agree to postpone the decision by one year.

The risks associated with multiple ETS schemes

Regardless of this delay (for the IMO scheme), EuDA identified possible risks associated with the coexistence of multiple emissions trading systems (ETS) (e.g. EU, UK, NO, ...). The most important risk for the dredgers is multiple 'taxation' of the same emissions.

Therefore, EuDA decided to prepare a paper on how to avoid double payments.

Securing a Safety and Security Culture, in which every Individual contributes

Innovative, sustainable and secure solutions are as good as the people who conceived them as well as those who implement them. Continuous training, upskilling, reskilling and educating are the necessary investments and corporate culture building blocks that will enable excellence to become a day-to-day reality on and off the field.

Local capacity building at clients and administrations around the world is also part of making the dredging market more sustainable.

**EUROPEAN DREDGERS,
A RELIABLE AND SECURE EU STRENGTH IN A MORE UNPREDICTABLE WORLD**



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 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 feeds the EuDA Strategy on European social legislations and its implementation through Annual Action Plans.

EuDA identified 5 clusters of key issues, covering all facets of dredging activities in the EU:

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, besides increased administration costs, often leads to 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 (which include subsidisation and tied financing) has significantly distorted global competition. Heavy subsidy schemes can allow unremarkable SoEs to gain markets at the expense of even more capable foreign competitors. Competitive companies need the level playing field to be able to compete fairly and 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-

2025 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 labour and 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)



Erwin Holterhues
(Vereniging
van Waterbouwers)

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.

For the purpose of this chapter, we will only focus on the labour issues or social aspects.

Overview of 2025 activities

Reflection and Restructuring of Meetings

EuDA reflected on reorganising its work and activities around social and labour affairs. The members of the EuDA Social Committee decided to focus more on in-depth discussions on specific topics and to exchange

more on best practices as well as taking common action through EuDA when relevant.

The meetings' **format** was adapted by adding a short preparatory meeting to confirm discussion topics and necessary preparations and technical expertise. The meetings' **content** was reviewed and the following priorities were agreed:

- Pay Transparency Directive
- Corporate Sustainability Reporting Directive (CSRD)

Following its reflection and restructuring, the EuDA Social Committee attracted new participants and 2025 saw a renewed meetings' dynamic.

EU rules on Remuneration and

Pay Transparency Directive

Objective of the Directive

In order to eliminate inequalities and to combat discrimination based on gender, the EU adopted on 10 May 2023 the Pay Transparency Directive (EU 2023/970) to strengthen the application of the 'principle of equal pay' (for equal work or work of equal value between men and women) through pay transparency, enforcement mechanisms and the establishment of common minimum requirements which should apply to all public or private undertakings and organisations across the EU.

EuDA Analysis

Pay Transparency and Equal Pay

It is important to distinguish between pay transparency and equal pay, which are separate concepts and discussion topics. The former is about internal and external (e.g. reporting) communication and the latter is about implementing the company's remuneration policy putting in place measures to avoid unfair discrimination.

International Shipping and Maritime Activities need International Rules

International legislations, such as IMO and ILO MLC, are applied by Flag States and have tailor-made provisions for international shipping. Ignoring these seafarers-specific dedicated legislations and standards to replace them by European horizontal ones may create serious collateral damage. For instance, instead of reducing the targeted issues, such as gender discrimination, the new laws could create new issues by ignoring nationally negotiated and agreed Collective Labour Agreements (CLAs). Or the new laws could be (mis)used to make unjustified salary demands (e.g. a Dutch salary for a Philippine resident/national).



Christel van Lent
(Van Oord)

Jolanda Hofman
(De Boer -
Dutch Dredging)

Paris Sansoglou
(EuDA)

Silvia Selandari
(EuDA)

Country of Residence

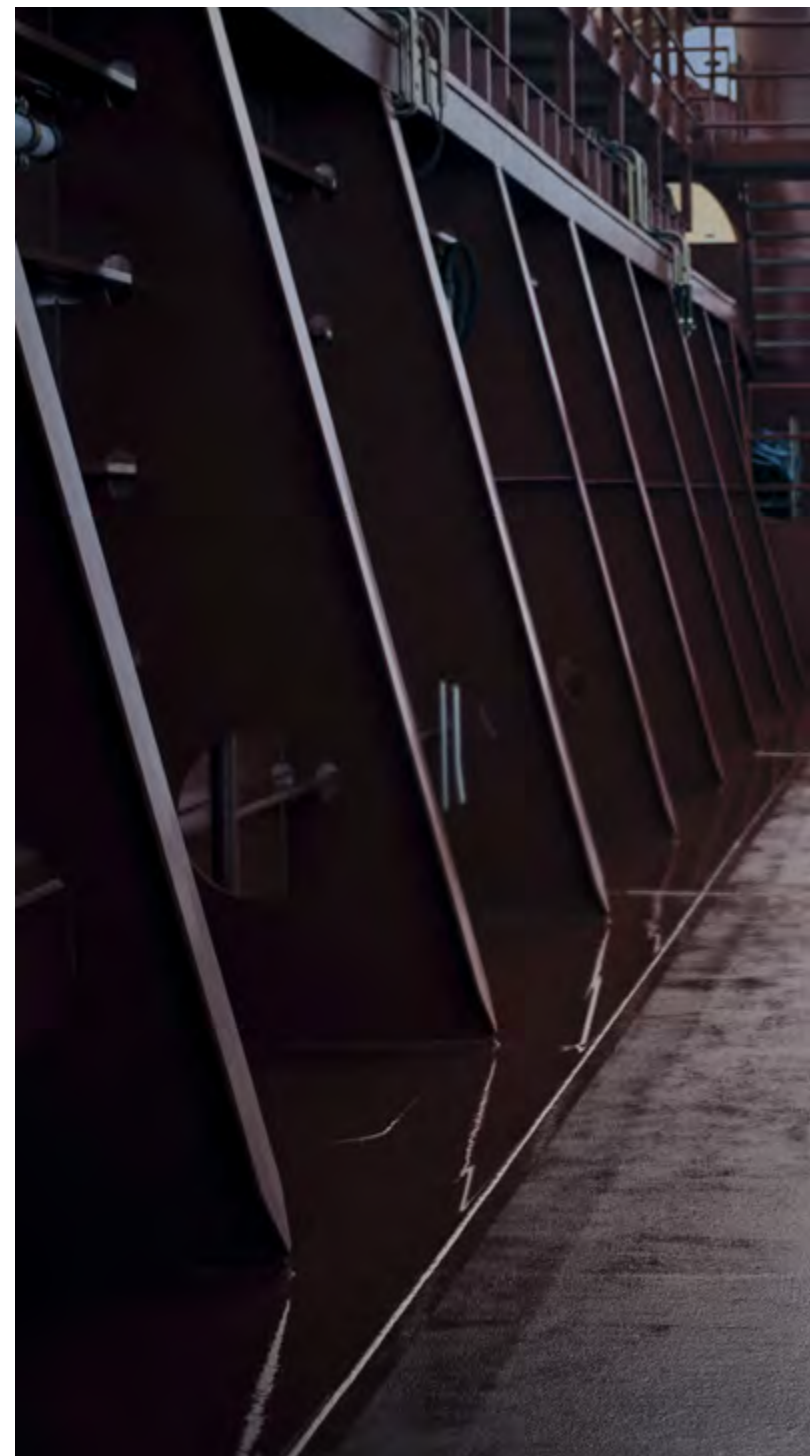
The Pay Transparency Directive is aiming to reduce (and ultimately remove) unfair gender discriminations in remunerations **within** each Member State. The Directive does not aim to eliminate remuneration discrepancies and differences **between** EU Member States nor between EU Members States and non-EU countries. The reference market to determine whether there are unjustifiable remuneration discriminations, should therefore be the country of residence of the workers rather than the Flag State of the vessel or the country of activity.

It is important to note that the ILO-MLC applies to seafarers and includes minimum wage provisions according to the **country of residence**. Moreover, this approach by country of residence is fully aligned with the views and general practices of the main shipowners' associations, such as ECSA and ICS. These associations have always promoted the application of international legislations (ILO MLC - IMO - UNCLOS - Flag State) to the seafarers, as well as the application of nationally negotiated Collective Labour Agreements.

Non-maritime stakeholders contesting the principle of the 'Country of Residence'

*On 18/08/2025, a non-binding verdict from the Netherlands Institute for Human Rights (NIHR) said an Indonesian and Filipino worker, working respectively on a vessel owned by VSO Zwerver I BV off the coast of Angola and on a Dutch tanker owned by Maritime Performance BV should not have been paid less (at least 50% less) than European staff for "comparable work". The NIHR added that the men were victims of discrimination based on nationality. KVNHR said they had used **collective labour agreements** based on the "country of residence principle" in order to remain competitive.*

This non-binding decision may provide inspiration for civil cases and spread to other EU Member States. European Shipping companies, in particular the Dutch, are taking action to clarify the situation. The Seafarers' Unions, such as Nautilus, are generally supportive of the current internationally agreed system (applying the principle of country of residence and respecting the nationally negotiated Collective Labour Agreements).







Assessment through the Different Stages of Employment

The Directive applies to the different levels and stages of the employment life cycle: from pre-employment of the staff throughout their entire career.

For instance, employers must provide clear information about the initial pay level or pay range for a position in all job advertisements or before the first interview. This ensures that candidates have a clear understanding of the potential pay before engaging in negotiations, reducing pay discrimination risk. However, the effectiveness of pre-employment measures will depend on the national legislations, as transposed from the directive.

For setting up pay levels as well as establishing a *pay progression policy*, the main challenge is to determine the right categories of personnel. For instance, two very different types of workers may be considered in the same category according to the law as these workers would be bringing similar added value to the organisation. However, pay levels may in effect differ significantly for various reasons not linked to gender discrimination: for instance, technicians (with a general male dominance) and assistants (with a general female dominance) may have different pay levels that are originating from skills, market dynamics, ... but not

from gender discrimination. Examples of objective criteria justifying salary differences include skills, effort, responsibility, seniority, experience, working conditions, ...

EuDA's involvement

The consequence of such a directive is that the salary negotiation process could fundamentally change.

Therefore, there is a need for a EuDA reflection on (and clarification for) the treatment of seafarers which have to comply with international standards (ILO MLC) and respect the existing national Collective Bargaining Agreements. EuDA is considering a clarification paper for dredging.

Corporate Sustainability Reporting Directive (CSRD)

Regarding the CSRD, this chapter is focusing on the specific social and human resources aspects (in coordination with TG SUST). EuDA has been working on

- EuDA common definition of workforce under CSRD reporting
- Which are the employees and which are non-employees ?
- Workforce boundaries and KPIs = ?

By formalising the logic for workforce qualification, companies can enhance their transparency, audit readiness, and alignment with CSRD expectations, while reinforcing their commitment to a skilled, safe, and inclusive work workforce. Moreover, such classification is also used by QHSE departments in their statistics (e.g. injury frequency).

EuDA common definition of workforce under CSRD reporting

With regard to the common definition of workforce, elements such as existence of a contract, existence of a relationship employer-employee, contract within the company (or group of companies) or via manning agent, ...need to be considered.

An alignment of the qualification logic with the European Sustainability Reporting Standards (ESRS) is needed to ensure that all employees (whether onshore, offshore, or in transitional roles) possess the necessary competencies, certifications, and continuous development pathways to meet both regulatory and strategic demands. However, this is a big administrative burden and the collected data is not always meaningful. Reduction of such a burden via the **Omnibus Package** would be seriously welcome.

Securing the necessary Knowledge by Connecting the Dots and better Understand, Anticipate and Prevent Security Threats

Research, Development and Innovation are essential investments for any future-proof industry.

Public incentives can play a key role in stimulating and accelerating progress towards the achievement of policy objectives, such as the net zero emissions.

The Sustainable Transport Investment Plan and the EU Innovation Fund, collecting the EU emissions' allowances, should stimulate the innovative capacity of the European fleet, including dredgers, to achieve decarbonisation while maintaining its global competitive edge.

**EUROPEAN DREDGERS,
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European Dredgers Innovating around the world

Knowledge is Power:

it is a well-known fact that the most successful companies KNOW WHAT they are doing (the facts), KNOW WHY they do it (the science), KNOW WHO will do it (the skilled, trained and educated labour force) and KNOW HOW to do it (the practical experience).

In their high-tech high added-value maritime segments, the European Dredgers can only compete where markets are open. Fighting protectionism around the world will lift some of the obstructions to deliver European made world-class innovations and state-of-the-art added-value. European Dredgers 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.

Innovative ideas and approaches are the necessary building blocks for identifying and implementing successful step changes as well as for progressing towards a sustainable world. But to do that we need to spend time and effort together. Proper financing of innovation processes has become a vital priority for strategic European industries such as dredging. Public support for research and development reduces risks and stimulates innovation. EU public procurement needs to transition towards a more innovation-friendly governance that will effectively promote goal-based and performance-based standards for sustainability as well as the optimisation of the life-cycle costs of ownership.

Therefore, 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 use of Life Cycle Assessment (LCA, covering design, execution, operation and decommissioning) of the costs and benefits of the

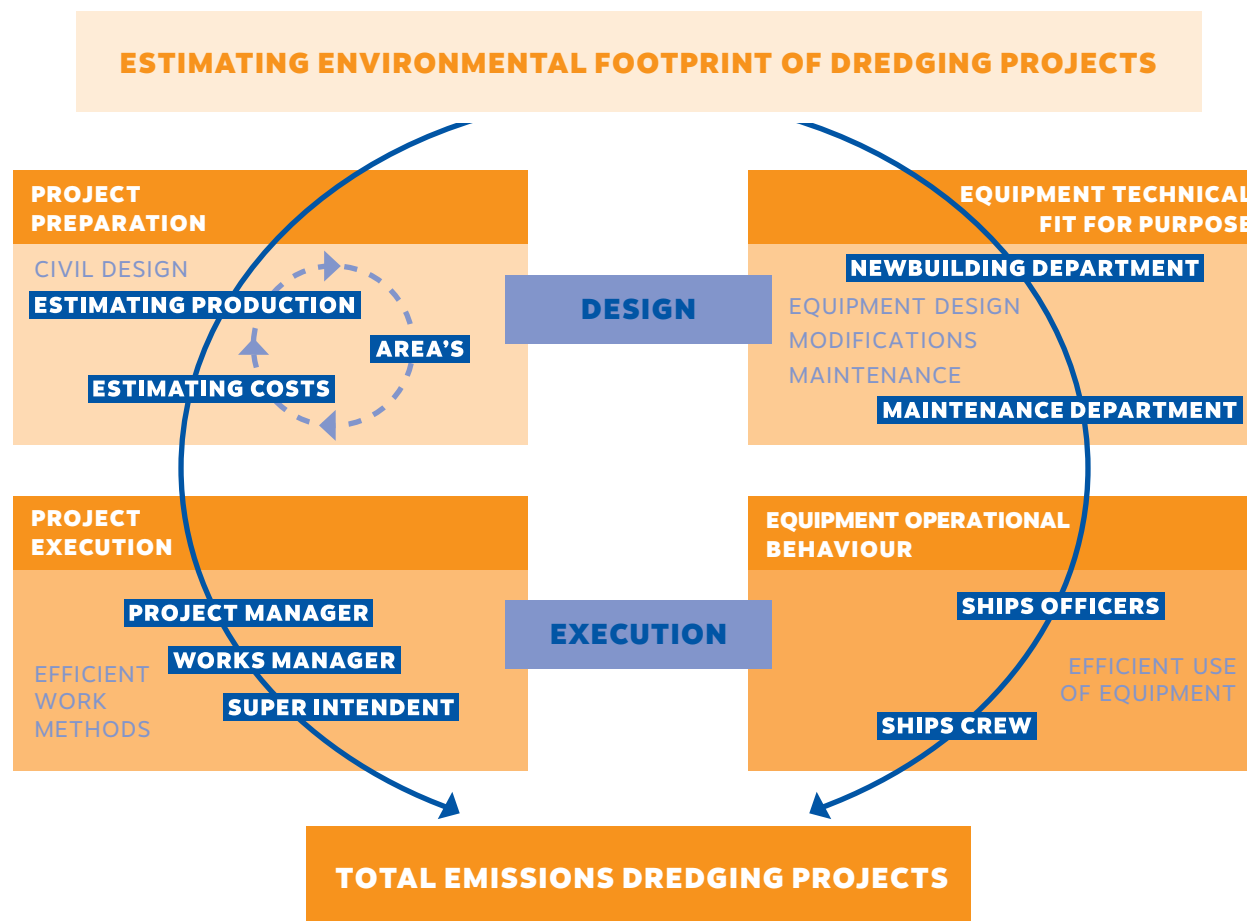
different possible alternative solutions for the award of publicly procured infrastructure projects. Typically, only the costs of the building phase are considered in public tenders for awarding projects while the possible added-value or cost reductions occurring afterwards (during operations, maintenance, or during decommissioning) are usually not taken into consideration for lack of appropriate governance. Even if 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. Most administrations will not ‘dare’ select the bid, that is less expensive over the life-cycle of the asset, when its building costs are higher than other more traditional ‘grey’ bids. 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 and to think outside the box of price-only decisions.

The Green Deal is the top priority of the European Commission and, combined with the 2025 Competitiveness Compass, has the potential to become

a game changer in the coming years. Significant investments and efforts 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.



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



European Maritime Days 2025, in Cork (Ireland)

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 in May every year and aims to raise the visibility of a Maritime Europe.

The 18th edition of the European Maritime Day (EMD) took place in Cork (Ireland) on 21, 22 and 23 May 2025. The focus of the EMD was on European Maritime Issues.

In his opening speech, the European Commissioner for Fisheries and Oceans, Mr Costas Kadis said *“we need to tackle the pressing challenges that the ocean is facing such as warming, rising, littering. In this respect, the European Ocean pact is a major step forward as the Ocean is central to Europe’s prosperity and security”*. The Director General for Maritime Affairs and Fisheries at the European Commission, Ms Charlina Vitcheva added *“We must do better and take a holistic approach to the ocean. The Ocean Pact will play a key role”*.

The Sustainable Transport Investment Plan (STIP) and the Innovation Fund

In November 2025, the European Commission presented its Sustainable Transport Investment Plan (STIP). According to the STIP, to bridge the financial gap in the short-term, InvestEU will mobilise at least €2 bn for sustainable alternative fuels until 2027. Also, the Commission will propose €300 mn by end of 2025 to support the production of hydrogen for sustainable aviation (SAF) and maritime (SMF) fuels through the **European Hydrogen Bank**. Moreover, the Commission will support R&I projects with around €133 mn under HorizonEurope. Furthermore, the Commission will mobilise €293 mn for maritime fuel projects under the **Innovation Fund**. Finally, according to the STIP, Member States are encouraged to allocate adequate ETS revenues for maritime and aviation sectors, including sustainable and low-carbon fuel production.

Unnecessary International Standards withdrawn

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







“Innovation friendly
decision-making systems
are not static but dynamic
and need regular adaptation.”

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.

EuDA’s analysis quickly revealed that these proposals were 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. The proposed standards followed successfully the adoption procedure and were adopted in 2020 (ISO IS20661-IS20662-IS20663).

In 2025, EuDA successfully requested the withdrawal of the standards ISO IS20661-IS20662-IS20663. After complaining from the beginning, that the initial proposals were not standards, EuDA members managed to discard these standards on the first occasion, the International Standards 5-year review. EuDA has also expressed its opposition to the proposed expansion of the scope of the working group to include harbour technology because the proposal does not reflect any demand from the market. EuDA members will pursue their activity in ISO with the aim of reducing risks for the dredging industry and of improving the enforcement of the ISO rules in TC8WG11.



Securing Balance and be Stronger Together in an Unpredictable World

EuDA and its members stand for the level playing field and market access, which are essential for economic sustainability. EuDA endorses the UN SDGs and the EU's ambitions to make Europe a sustainable continent.

EuDA created a cooperative environment for European dredgers to communicate their effective solutions to and exchange their views with the European Institutions.

**EUROPEAN DREDGERS,
A RELIABLE AND SECURE EU STRENGTH IN A MORE UNPREDICTABLE WORLD**



MEMBERS



Belgium

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



Bulgaria

Boskalis Offshore Subsea Contracting B.V.



Cyprus

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



Denmark

DEME Offshore DK A.S.
 Rohde Nielsen A.S.



Finland

Terramare Oy



France

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



Germany

HDC Wasserbau GmbH Nord
 Hegemann GmbH / Dredging
 Heinrich Hirdes GmbH
 Jan De Nul Nassbagerei 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.



Greece

DEME Dredging N.V. (Branch Greece)



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
 Societa Italiana Dragaggi SpA (SIDRA)



Latvia

Baltic Marine Contractors SIA



Lithuania

UAB Boskalis Baltic



Luxembourg

DEME Luxembourg S.A.
 Dredging and Maritime Management S.A.



Netherlands

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 Environmental NL B.V.
 DEME Offshore NL B.V.
 Dredging and Contracting Rotterdam B.V.
 Koninklijke Boskalis N.V.
 Mijenster zand- en grindhandel B.V.
 Paans van Oord B.V.
 Van den Herik Kust- en oeverwerken B.V.
 Van der Kamp International Dredging B.V.
 Van Oord Dredging and Marine Contractors B.V.

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

 Van Oord Nederland B.V.
Van Oord N.V.
Vereniging van Waterbouwers

 **Norway**
DEME Offshore NO A.S.
Van Oord Norway A.S.

 **Poland**
Boskalis Polska Sp. z o.o.
DEME Dredging N.V. (Branch Poland)
Van den Herik Polska Sp. z o.o.

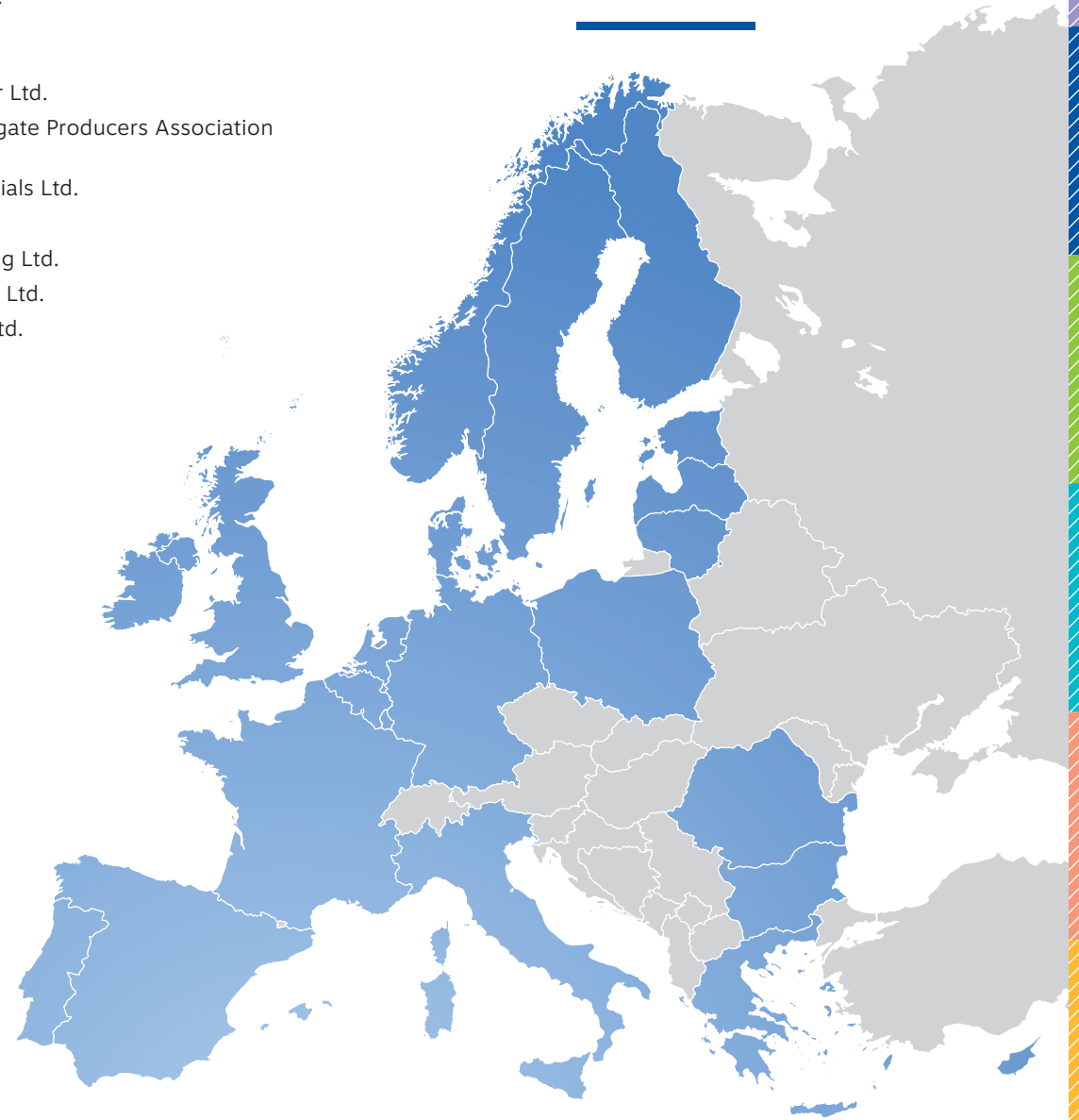
 **Portugal**
Boskalis Sucursal em Portugal
Dragapor Dragagens de Portugal S.A.
Dravo S.A. Portugal Branch
Dredging International N.V. (Branch Portugal)

 **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.

 **Sweden**
Boskalis Sweden A.B.

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







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 management and the state of EuDA finances and therefore they come from a different member organisation than the EuDA Treasurer's.

2025 Members of the Verification Committee



Mieke Fordeyn
(Jan De Nul)

Hilde Vermeire
(DEME)

ABOUT EUDA

The European Dredging Association ("EuDA"), which celebrated its 30th Anniversary in 2023, 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 Institutions, including the European Parliament. 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 14.6 bn Euro in 2024. Although 70% of operations take place outside Europe, 90% of the returns flow back to Europe. EuDA members employ approximately 30,000 European employees directly "on board of the ships and on land" and more than 60,000 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, Tax 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.

THANK YOU, Mieke!

In 2016, you joined the EuDA Verification Committee. This committee independently verifies EuDA's annual accounts and certifies that they are true, transparent and without irregularities towards all the members of EuDA gathering at the Annual General Meeting. As a member of this Committee, you scrutinised the accounts

into the last detail. You also provided the Board with independent advice on the management and the state of EuDA finances.

On behalf of the EuDA Secretariat, I would like to thank you, Mieke, for your dedication and support to EuDA. You will be missed.

We wish you all the best in your new endeavour. Thank you, Mieke. Good luck to you and Farewell!

Paris Sansoglou,
Secretary General



Mieke Fordeyn
(Jan De Nul)





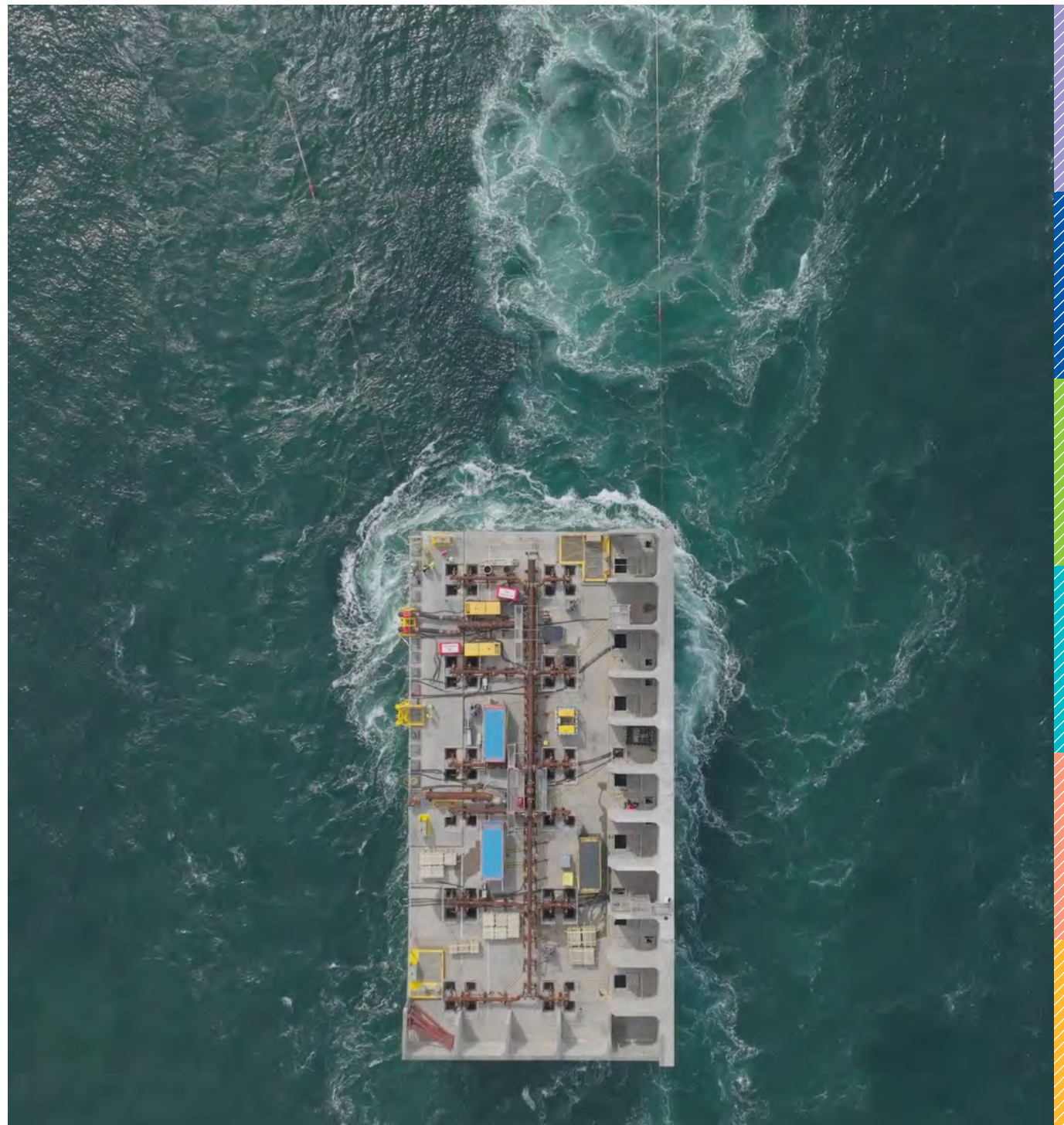
FROM LEFT TO RIGHT)

Paris Sansoglou
Secretary General

Vassia Nikolopoulou
Secretary

Silvia Selandari
Director for Trade Affairs





EuDA Contacts Paris Sansoglou, Secretary General Silvia Selandari, Director for Trade Affairs Vassia Nikolopoulou, Secretary
42, Boulevard de la Woluwe 1200 Brussels Belgium T. +32 (0)2 646 81 83 E-mail info@euda.be www.european-dredging.eu