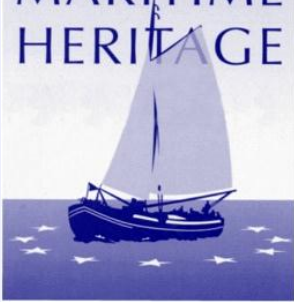


# EUROPEAN MARITIME HERITAGE



## The European Association for Traditional Ships in Operation

Avec le patronage de l'agence  
européenne pour la culture  
(UNESCO)

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Andijk, 16 November 2010

Dear Mr. Mason,

We have heard that the European Commission has identified three categories as problematic under the directive 2009/45: traditional ships, small ships and sailing ships.

European Maritime Heritage (EMH) warmly supports the intention and efforts of the Commission to solve the problems of traditional vessels and sailing vessels. These ships and their activities should no longer be 'tolerated' by the virtue of not very clear conventions and Directives meant for other ships, but are entitled to have dedicated regulations of their own.

This has already been recommended by the Council of Europe in their recommendation 1468/2000. We cited it in our contribution to the Green Paper on Maritime Policy and the Commission has acknowledged this in the Blue Book Maritime Policy under 4.5.

In our opinion either existing directives should be made better applicable or new ones will have to be established. It is important that since the problems with national safety certificates occur on domestic and international voyages a solution should address both.

EMH supports the idea of approaching the two categories (sailing vessels and traditional vessels) separately in analogy with Directive 2006/87. Nevertheless the group of sailing vessels represents a very broad variety of ships to bear in mind.

We would like to stress the urgency of the matter. At this moment ships, especially in the Baltic, are threatened with detention at any given moment, and crews and owners live under a constant stress. In some countries the uncertainty also effects the Flag State authorities and the way they interpret their own national safety regimes, all adding to the stress of ship owners and resulting in some cases of ships being forced to stop their activities.

In this respect we would cordially like to propose a stand-still on further regulations and international discussion during the period of drafting dedicated regulations, and thus recommend member states to accept vessels operating under their respective national legislation for that period of time.

Yours sincerely,

Per Jessing  
President of EMH

CC: Members of the MoU Wilhelmshaven 2000 (Denmark, Estonia, Finland, Germany, Norway, Sweden, Spain, The Netherlands, UK)