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Distinguished Commissioner Balli,  
Distinguished Commissioner Semeta,  
Distinguished Colleagues of the Responsible Units,

Feport, as the European representation of Maritime Terminal Operating Companies, has considerable concerns related to the handling of potentially radioactively contaminated vessels, containers and/or cargo. Against this background Feport welcomed the Commission's Regulation on the conditions governing the import of feed and food originating in or consigned from Japan (297/1011). The potential exposure goes however beyond these products and incorporates also the risk related to the vessels sailing from Japan and to the containers coming out of the affected areas in Japan.

The risk stemming from either contaminated cargo, containers and/or vessels affects to equal extent the safety and health of port employees, be it dock workers, pilots, tug staff, etc, but also more importantly the inhabitants of Europe itself. Moreover the operational performance on the handling in our European ports can be seriously be affected by incidents, in which significant parts of the port can be closed down for extensive periods of time until the disposal of the contaminated cargo is sorted out.

Feport is therefore of the opinion that an urgent need exists for further clarifying what the views of the Commission are related to:

- The introduction of a unified European indicator for maximum permitted levels of radioactive contamination of cargo, containers and vessels that gives the competent authorities in the Member States a guidance, as of what radiation level health hazards might occur and protective measures should be taken
- Introduction of rules of procedure for competent authorities of the Member states to share any information and/or outcome of measurements of seagoing vessels, containers and cargo arriving in EU ports with the competent authorities in other Member states

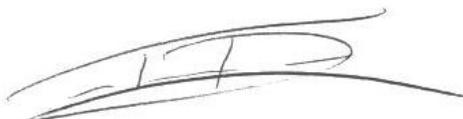
- Ensure that appropriate rules of procedure are designated and implemented by the competent authorities to safeguard safety of workers and citizens at all times and to free scarce port capacity as efficiently and swiftly as possible after contaminations of incoming cargo, vessels or containers have been identified
- Impose, as in Regulation 297/2011, the obligation to accompany container and vessel by the appropriate declarations that both have been satisfactorily tested in Japan on the presence of radioactive contamination.

Feport is awaiting further initiatives of the Commission to ensure that rules are transparent and that no undesired safety risks arise because of unclear, interpretative or contradictory instructions at any of the levels involved.

Feport acknowledges the proactive role taken by the Commission so far. However, due to the recent progress in handling the disaster in Fukushima further action is required by the Commission now that the first vessels are entering the ports of Europe.

Best regards,

Signing for EXCOM of FEPORT

A handwritten signature in black ink, appearing to read 'D. Teurelincx', with a long horizontal flourish extending to the right.

Diego Teurelincx  
Secretary General