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Megaports Initiative – A Perspective of the European Transshipment Ports

Dear Madam, Sirs,

FEPORT

FEPORT is the European representation of maritime terminal operators and stevedoring companies. As such, within the current European port structure, FEPORT basically represents close to all cargo handling in European ports.

In this capacity FEPORT is intensively committed to international non-proliferation efforts and supports measures that seek to bring about a more effective security environment in maritime trade through non-proliferation of weapons of mass destruction (WMD) and related materials. For this reason FEPORT also endeavours to play an active and constructive role through various regional and international fora, such as the International Maritime Organization, the World Customs Organisation, the European Commission as well as related organisations in the maritime and port sector.

FEPORT and its member companies are in the forefront transposing their international obligation to enhance maritime security into effective port controls against the illicit trafficking of WMD items, their means of delivery and related material. FEPORT believes that enhanced international and regional co-operation is the way forward to combat the potential proliferation of WMD and their related systems. To this end, FEPORT and its member companies participate actively in various non- and counter-proliferation initiatives such as the Proliferation Security Initiative, the SAFE-framework, the Container Security Initiative as well as in the concept of enhanced supply chain security through an advanced export control system in European ports.

MEGAPORTS

We understand that the United States are currently working with partner countries to enhance the ability to deter, detect and interdict illicit trafficking of special nuclear and other radioactive materials in the global maritime system. One mechanism that is used to accomplish these goals is the U.S. Department of Energy's Megaports Initiative, which provides radiation detection equipment, training and technical support to international partners of the United States to scan shipping containers in strategic ports for the presence of radiation.

TRANSSHIPMENT

While acknowledging a necessity to deter and interdict illicit trafficking of WMD material by scanning import and export containers for radiation at ports around the world, FEPORT can identify only a limited use of the Megaports Initiative in European transshipment ports, such as Gioia Tauro, Algeciras, Taranto, Cagliari, Marsaxlokk and Piraeus.

Whereas container gate traffic in an im- and export port can easily be captured by taking advantage of existing checkpoints into and out of such a port, the scanning of transhipped cargo returns to be more onerous and of little additional effectiveness.

Having studied the prerequisites and implications of the Megaports Initiative, it can only be concluded that capturing transshipments without seriously impacting port operations in a transshipment port is not possible. This is mainly due to the shorter dwell times for containers that need to be scanned, space constraints on the transshipment terminals, the lack of shipping data and the difficulty of identifying non-disruptive permanent radiation detection technologies within terminals.

Furthermore, the effort needed to scan containers for nuclear and other radioactive materials while being transhipped through radiation detection equipment deployed on e.g. straddle carriers or mobile units on the terminals seems disproportional to the strategic gain of such an initiative. Cargo of European transshipment ports is – in a very short timeframe – redistributed to other ports in the European Union from where the cargo is shipped to its final destination inside or outside European territory. IT-based accompanying measures are well developed and seem to be sufficient for the short and controlled time containers spend in ISPS facilities during transshipment.

Against this background, any control of cargo strategically makes only sense in the ports that act as final im- or export shipment ports of the European Union. Any effort to install radiation detection equipment should therefore be concentrated on these final ports of shipment and should not be installed in transshipment ports where cargo only transits.

Above, only the main conclusions of our FEPORT security experts have been presented. The initiative as such is well supported for im- and export ports; the application to transshipment ports however is questioned regarding its effectiveness. To further explore the opportunities and implications of the Megaports Initiative, FEPORT is well prepared to invite the U.S. Department of Energy's National Nuclear Administration to further discussion on the above named concerns.

Hoping to have identified some concerns related to the application of Megaports to transshipment ports and looking forward to future debate on the considerations raised, I remain yours sincerely,

Diego Teurelinx - Secretary General