Merenkulun väylämaksujen uudistamisesta *Brussels, December 16th, 2017*

LVM/1774/05/2017

To whom it may concern,

Royal Caribbean Cruises Ltd. thanks for the opportunity to submit its opinion to the Finnish Ministry of Transportation on the issue of Fairway Dues *(LVM/1774/05/2017*).

As background we would like to note that the nature of the cruise industry is such that they are required to plan their operations several years ahead. Therefore, a stable fee system is of utmost importance. RCCL welcomes the Finnish governments intention of formulating a permanent fee structure, which would help the cruise industry in future financial and operational planning. Of course, RCCL and the cruise industry as whole see any increases in Fairway Dues as having a negative effect on the attractiveness of Helsinki as a port of call, whereas reductions in fairway dues make it more attractive. This is important as Helsinki is not a prime destination, but a potential stopover - as are many other Baltic ports - for cruise ships on their way to St. Petersburg

The Baltic Sea region has experienced steady growth in the cruise sector and although Baltic ports are in fierce competition, Helsinki would almost certainly benefit from being a cost-attractive port of call. Any losses in Fairway Due revenue would likely be offset by increased cruise tourism spend. The average cruise passenger spends on average 100 euros per day, and this expenditure is primarily targeted at the labour-intensive tourist sector. In the case of Helsinki this expenditure is estimated to amount to about 40 million euro per year.

It is our understanding that the prime reason for collecting Fairway Dues is to cover the costs of ice breaking services in the winter, including offsetting the cost of building ice breaking vessels. While RCCL, as arguably the biggest customer for Finland’s ship building industry, understands the considerable costs involved, we would like to point out that as a general principle, one should only pay for services received. It is therefore not reasonable that the seasonal cruise sector should significantly contribute to finance services it never, ever uses.

RCCL believes that a review of the Fairway Dues in Finland – and Helsinki in particular – should result in a system that takes in to account the seasonal nature of the cruise sector. This could be managed by collecting dues only from those vessels who use ice breaking services, reducing dues to those who do not, or by reducing the dues for the Port of Helsinki, which is the exclusive port of call in Finland for most international cruise operators.

Keeping Helsinki as an attractive cruise destination is of equal benefit to RCCL and the cruise industry, to the city of Helsinki, which has just invested in a major new quay for cruise ships, and Finland as a whole.

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