



European Federation of Inland Ports

Position of the European Federation of Inland Ports (EFIP) on the European Green Deal

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Europe's inland ports as **Enablers of Green Logistics** welcomed the presentation of the European Green Deal on 11-12-2019. These priorities are essential for a sustainable European economy but will prove insufficient on their own. Inland ports are multimodal hubs within the European logistical system, supplying industries and our cities.

As the unique representative of inland ports in Europe since 1994 – constituting of nearly 200 inland ports located in 18 Member States of the EU and Switzerland, Serbia and Ukraine – **EFIP believes that the European Green Deal for sustainable transport should take into account the following recommendations in order to be successful:**

Making the modal shift a success

For the last 20 years, achieving a modal shift of transport away from polluting modes has been core to the European decarbonisation strategy. Although this has yet to be achieved, it remains an essential objective. The promotion of sustainable forms of transport (i.e. inland waterways and rail) is a fundamental to reaching a climate-neutral economy.

A Single European Multimodal Area

The EU has a strong legislative corpus geared at supporting the various transport modes. However, there is a lack of support for multimodal transport, leading to an acute silo effect that has profoundly impeded the modal shift. **As such, EFIP welcomes the withdrawal of the Combined Transport Directive proposal.** A revised proposal should aim to create the legislative mechanisms needed to shape a true Single European Multimodal Area. This should include at the very least the following:

- Including inland waterway transport as an equal mode to rail and road;
- Supporting tools, fiscal, legal or other, for low emissions and congestion-mitigating forms of transport and combined transport operations;
- Creating an interoperable intermodal data set that will support digital initiatives enabling combined transport actions;



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- Taking into account the application of inland waterway legislation especially in regard to waste management.¹

NIAIDES

The NIAIDES programme has proved to be the primary EU initiative supporting the inland waterway sector. The inland waterway sector still needs EU support in order to enable the envisioned modal shift. A successor programme to NIAIDES II is needed as the foundation of Europe's activities. Even more so than before, it needs to be given a strong mandate conform to the [Recommendations of the NIAIDES Expert Group](#). Aside from these recommendations, EFIP wants to give special attention to the following objectives:

- Ensuring year-round navigability across Europe's waterways to guarantee predictability for customers and economic viability;
- Investing in the rehabilitation and upgrade of infrastructure, especially in areas with deteriorated assets, such as along the Danube.

"Initiative increasing railway capacity"

Rail will play a fundamental role in achieving the Green Deal goals alongside IWT. Inland ports exist at the intersections of rail and IWT; each mode amplifying the other's economic importance. But rail connections with inland ports are faced with challenges. In many cases, inland ports **find their rail connections lacking quality and capacity or even completely absent**. For instance, many Danube ports struggle with outdated rail connections while the port of Brussels is having its rail connection dismantled by the federal government. This is detrimental to achieving the modal shift foreseen in the European Green Deal.

EFIP, together with ESPO, created a rail [position paper](#) with more detailed insights into this issue.

EU strategy on adaptation to climate change

Climate change is already having a profound effect in Europe and inland waterways are among the first sectors to experience, first-hand, this impact. Unlike other transport sectors, inland waterways already see their operations affected by extreme climate events. 2018 saw a protracted drought that had a detrimental effect on water levels and natural habitats. As a result, inland waterway transport decreased, resulting in a modal shift in favour of road transport. Even if the COP 21 climate goals are achieved, abhorrent and extreme weather will regularly be observed.

European logistics needs to be prepared to address this issue through smart and sustainable infrastructure. European inland ports believe that a European approach is necessary to ensure that inland waterway transport will continue to be possible across Europe.

¹ <https://www.cdni-iwt.org/presentation-of-cdni/?lang=en>



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TEN-T Revision

The foundation for progress in European transport is the completion of the Trans European Transport Network (TEN-T). EFIP believes that TEN-T will play a key role in removing bottlenecks, decreasing the carbon footprint of the transport sector, as well as promoting interoperability, multimodality, high-quality transport, efficient use of the existing infrastructure and application of new technologies across the core network by 2030 and the comprehensive network by 2050.

However, essential points to take into account going forward include:

- 1) **Recognising the cross-border importance of inland ports;**
- 2) **The number of passengers should be included as a criterion for designating an inland port as part of the TEN-T network;**
- 3) **Inclusion of the current class III inland waterways in the TEN-T network;**
- 4) **Quality infrastructure through upgrading and rehabilitation;**
- 5) **Full connections to inland ports.**

For more in-depth considerations, please see the [EFIP TEN-T Position Paper](#).

Cleaning of transport

Decarbonisation of the various transport modes is central for the achievement of the Green Deal objectives. This requires a clear and long-term strategy that lays out a technology-neutral roadmap that the entire logistics sector can follow.

A strategy for sustainable and smart mobility

The sector is eager to move ahead with the investments and public works alluded to in the European Green Deal. However, clarity is essential. Inland ports seek a **clear strategy for sustainable and smart mobility** to signal the direction for the sector as a whole. There is a great risk of stranded investments – as is perhaps already the case for LNG bunkering facilities – leading inland ports to be cautious when considering investment.

Of particular importance is **cooperation within the sector**. The strategy for sustainable transport should recognise that the fundamental changes in the powertrains of vessels will need the input of all the stakeholders. Shipowners, in particular, should be leading the way in signalling their expected energy choices so that ports can make sensible investments and the risk of stranded assets diminishes. First movers need to be supported primarily by reliable legislative certainty. A stringent process is needed as part of the strategy; ports, shipowners and operators should be brought together with the river commissions to plan for the transition. As such, EFIP welcomes the work being carried out by the CCNR investigating future trends in alternative fuels in inland waterway transport.



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It is also important that the **sustainability strategy does not lead to fragmentation between Europe's waterways**. If investment decisions differ greatly along waterways, leading to an imbalance in the infrastructure of certain energy carriers, it would create technological borders and limit gains in innovation, building and operation from the economies of scale of each alternative fuel. As such, EFIP suggests **a network approach where the availability of all alternative fuels is the primary consideration**.

The principles of technology neutrality and a goal-based approach should be the foundation for a **flexible alternative fuels strategy**. Nonetheless, given the example of past fuel options such as biofuels and LNG, the sustainability strategy should include certain checks and balances. In particular, an instrument could be designed that obliges alternative fuels to be zero-emissions – ensuring a degree of clarity – while allowing for flexibility in prescribing further delimitations if negative externalities are found due to the use of a certain fuel – as in the case of ILUC for biofuels.

Flexibility is also essential in the **infrastructure deployment**. Although the TEN-T legislation only differentiates Core and Comprehensive transport nodes, the variety that exists on the ground between ports means that obliging every port to deploy infrastructure is inefficient and an undue burden. This is because certain ports may not have sufficient traffic to make a business case for a certain particular fuel infrastructure or ports in a certain stretch of waterway may not be geographically suited to warrant multiple recharging stations. A more efficient approach would be to **make compulsory the deployment of alternative fuels infrastructure at appropriate intervals following network needs** to ensure efficient infrastructure investments.

Emissions at berth and the Energy Taxation Directive

There are currently legislative barriers hindering the uptake of alternative fuels infrastructure, concretely, the **Energy Taxation Directive**. At the moment this legislation means that no taxation is paid for red diesel, in spite of its high SO_x emissions, while electricity for vessels at berth is taxed. This situation is clearly inefficient and must be remedied as soon as possible with a revision of the Energy Taxation Directive consistent with the European Green Deal objectives. EFIP strongly believes that the review of the Energy Taxation Directive should support the uptake of all sustainable clean fuels and energies by **introducing a long-term tax exemption** for those fuels.

European Inland Ports support an **obligation for zero emissions at berth** by 2030, rather than the obligation to deploy shore side electricity facilities. This way, optimal choices will be made avoiding stranded electricity facilities in ports or corridors where traffic becomes hydrogen-based, for example. This will ensure the desired improvements in air, noise and waste pollution while allowing a degree of flexibility for stakeholders.

Sensitivity to port specificity is therefore vital. OPS installation should also be carried out in close coordination with other waterway stakeholders. Moreover, it is important to recognise the **specificities between vessels and terminals**. Inland container vessels, for instance, only tend to moor for a little over an hour at a terminal, making electric charging unfeasible, whereas dry bulk containers will often moor for around a day. Thus, flexibility in deployment between terminals should be recognised in alternative fuels infrastructure legislation going forward.



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Support for the Green transition

Achieving the modal shift and greening inland waterway transport will entail a fundamental change in port and waterway operations. As such, they require appropriate investment solutions. As public entities, investment in new and innovative solutions will be very difficult for inland ports. Member States need to provide the necessary resources to roll out the investments with the support of the EU.

European instruments such as the Connecting Europe Facility, the Innovation Fund, and the Invest EU fund will prove to play a vital role in providing investment support. However, for these instruments to be effective, a sizeable budget will be needed. As such the first step will be to ensure that the **European Multiannual Financial Framework** is substantial enough. The Green Deal consists of necessary ambitious that cannot be achieved with reduced financial means.

