European Federation of Inland Ports

Position of the European Federation of Inland Ports (EFIP) on the consultation of the TEN-T Guidelines

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As the unique representative of inland ports in Europe since 1994, EFIP welcomes the opportunity to give a contribution of its own network – constituted of nearly 200 inland ports located in 18 Member States of the EU and Switzerland, Serbia and Ukraine – about the "Regulation No 1315/2013 on Union guidelines for the development of the trans-European transport network" (**TEN-T Regulation**). This position paper aims to provide input in order for the objectives of the Regulations to be reached in an efficient and effective manner.

The "**2011 Commission's White Paper on transport**"[1]stipulates the need to shift 30% of road freight over 300 km to "environmentally friendly modes of transport" by 2030 and 50% by 2050. This was once more underlined in the Commission's communication "**A clean Planet for all**"[2] stating that in order to respect its commitment to the Paris Agreement, the EU should achieve net-zero CO2 emission economy by 2050. This also requires a number of measures and commitments in the transport sector. EFIP is convinced that the TEN-T regulation serves as the cornerstone of reaching these ambitious goals.

In addition, EFIP believes that the implementation of the proposals expressed in this paper would contribute to 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.

In December 2018, the Council of the European Union adopted its conclusions on "**Inland waterway transport – exploiting its full potential"**[3]. These conclusions acknowledge the role of inland waterway transport (IWT) as an efficient, safe and sustainable mode of transport, which should be further developed and supported. This was followed by the European Parliament resolution in February 2019 entitled "**NAIADES II - An action programme to support inland waterway transport**"[4]". Both political declarations underline the importance of the European inland waterway transport.

The TEN-T Regulation outlines Europe's transport network. As European inland ports are transport multimodal hubs supporting clean transport, enhancing multimodality, catering to circular economy and reducing congestions, the TEN-T network is essential for their economic and logistical viability.

[1] https://ec.europa.eu/transport/sites/transport/files/themes/strategies/doc/2011_white_paper/white-paper-illustrated-brochure_en.pdf
[2] https://ec.europa.eu/clima/sites/clima/files/docs/pages/com_2018_733_en.pdf
[3] https://www.consilium.europa.eu/en/press/press-releases/2018/12/03/inland-waterway-transport-exploiting-its-full-potential/
[4] http://www.europarl.europa.eu/doceo/document/TA-8-2019-0131_EN.html

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The Inland Waterway Transport (IWT) sector relies heavily on a well-functioning network. By evaluating and reviewing the TEN-T Regulation, the European inland ports want to raise the following considerations.

A revision of the TEN-T guidelines needs to:

- **Continue building on the foundation of the two planning layers of TEN-T**. The current TEN-T guidelines have given a clear horizon for European infrastructure and transport development objectives for both Core and Comprehensive networks. This strong foundation needs to be maintained and expanded upon. IWT is an important sector for the economy of many regions and could play a role in promoting alternative forms of transportation in order to reduce the CO2 emissions.

- **The TEN-T Guidelines have to be future proofed.** European transport, as most aspects of the EU economy, is in a period of change resulting from challenges such as the necessity to drastically reduce CO2 emissions, enhance digitalisation, tackle climate change challenges, combat congestion and increase competition. As the TEN-T network completion is foreseen for 2030 (Core) and 2050 (Comprehensive) and as another revision has not been planned, we need to take into account in the current revision the ongoing and upcoming innovations while leaving enough room that they are currently to a large extent unpredictable.

EFIP recommends the following considerations:

1) **Cross-border links**

One of the main objectives of the current TEN-T policy is to close missing links and remove bottlenecks, with a strong focus on cross-border connections. The TEN-T regulation includes the definition of a "cross-border section" as a section which ensures the continuity of a project of common interest between the nearest urban nodes on both sides of the border of two Member States or between a Member State and a neighbouring country.

Even if inland ports are situated in one Member State, they are European logistical hubs largely active in the trade with other EU Member States and third countries. EFPI believes that inland ports should be considered as cross-border actors and international in nature. Port projects which create a value for the society that exceed national borders, by increasing multimodal connectivity across the network and economy, as well as increasing the sustainability of the transport and logistics chain, should be prioritised on an equal basis with narrowly defined cross-border projects.

2) The number of passengers should be included as a criterion for designating an inland port as part of the TEN-T network.

Article 14 of the Guidelines lay out the criteria for comprehensive inland ports. These criteria do not recognise the changes that have been occurring in the European inland ports. This is especially the case regarding passenger transport. Certain inland ports are developing more as dedicated passenger hubs than traditional freight centres while other are expanding their hybrid role. According to Eurostat[5], in 2016, 4,000 enterprises transported passengers on inland waterways, generating more than 2.3 billion EUR.

Legislative suggestion:

Article 14 – paragraph 2

To be part of the comprehensive network, inland ports shall meet at least one of the following criteria:

(a) the total annual freight transhipment volume exceeding 500 000 tonnes. The total annual freight transhipment volume shall be based on the latest available three-year average, as published by Eurostat;

(b) the total annual volume of passenger traffic volume exceeds 0.1% of the total annual traffic volume of all inland ports of the Union. The reference amount for this total volume is the latest available three-year average, based on the statistics published by Eurostat.

3) There is a need to clarify the distinction between comprehensive and core inland ports.

Since 2014 there has been a profound absence of clarity when it comes to the distinction between comprehensive and core inland ports. Articles 14 and 16 of the TEN-T Regulation outline the scope and requirements for the entirety of the inland waterway sector. Additionally, all class IV inland waterway sections were identified as core due to their strategic importance in achieving the **2011 Commission's White Paper on transport**[6] objectives.

This has resulted in a marked lack of clarity on the side of Europe's inland ports. Inland ports do not know whether they are considered as part of the comprehensive or core network when applying for the EU funding. This became very clear during the 2019 CEF comprehensive call when comprehensive inland ports situated on inland waterways designated as part of the Core network were excluded from the call. **This makes it difficult for inland ports to know what objectives they need to achieve, when they need to achieve them and what calls they can apply to**.

[5] http://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=sbs_na_1a_se_r2&lang=en
[6] https://ec.europa.eu/transport/themes/strategies/2011_white_paper_en

During the inland waterways audit in 2018, the European Court of Auditors concluded that "no difference was made between the core and comprehensive networks, which did not help with the prioritisation of waterways. The EU strategies did not prioritise the elimination of bottlenecks nor did they prioritise rivers on which to invest the limited available resources"[7]. Moving forward, this issue needs to be addressed in order for European Inland Ports to clearly understand their position within the TEN-T network.

4) Inclusion of the current class III inland waterways in the TEN-T network.

Under the current TEN-T Regulation, class III inland waterways (ECMT[8] classification) are not included in the TEN-T network. This results in little to no development on those waterways and the ports located along those waterways. Updating these sections of waterways to level IV might not be achievable in many cases due to the important investments to be undertaken or/and the current economic activities in these regions.

The TEN-T Regulation also aims to promote regional cohesion and further economic growth. Recital 17 of the TEN-T Regulation specifically calls for the integration of class III inland waterways to be considered. The European inland ports support the integration of class III waterways and the relevant ports into the TEN-T network. This will increase the economic relevance and viability of some regions and improve interoperability of IWT across Europe as the range of the TEN-T network would be increased.

However, integrating class III inland waterways should only be considered if they contribute to the interoperability of the TEN-T network and regional cohesion of the EU. Class IV waterways should continue to exclusively constitute the core network, maintaining the current extent and size of the class. The core network enables cross-border inland waterway traffics and any degradation will be detrimental to the European network.
As such, only inland waterways currently not integrated in the TEN-T network should be considered for inclusion into the comprehensive network constituting class III waterways.

In order to make sure that the Member States undertake necessary measures to ensure that navigation in Europe is well developed, it is necessary to have a clear definition of "good navigation status" in the TEN-T Regulation.

5) Quality infrastructure

[7] https://www.eca.europa.eu/Lists/ECADocuments/LR_TRANSPORT/LR_TRANSPORT_EN.pdf
[8] ECMT refers to "the European Conference of Ministers of Transport"

The success of inland waterway transport depends on a robust transport infrastructure network with available capacity and many opportunities for sustainable transport. This requires the removal of bottlenecks and making infrastructure fit for purpose.

On the one hand, this requires capacity upgrades across the entire network on infrastructure such as locks and bridges. On the other hand, the network also requires performance upgrades in order to be future-proof. This means upgrading the existing infrastructure to become climate change resilient, enabling autonomous sailing, useable for new digital logistical concepts while improving reliable navigability.

In its 2018 Landscape Review "**Towards a successful transport sector in the EU: challenges to be addressed**"[9], the European Court of Auditors found that EU strategies for transport along inland waterways lacked a comprehensive and robust analytical basis and that the cost of eliminating bottlenecks in Europe (around €16 billion) greatly exceeded the available funding from the EU budget for inland waterway infrastructure. Therefore, the European inland ports ask that quality and future-proof infrastructure be a priority within the TEN-T evaluation and underline the necessity to make targeted and sustainable upgrades.

Finally, to be futureproof, the TEN-T corridors should include new standards of digitalisation within the EU-framework, especially regarding data exchange between infrastructure managers (including IWT), and terminal and transport operators.

6) Climate resilience

Climate change is already having a profound effect on European inland waterway transport. 2018 saw a protracted drought that had a detrimental effect on water levels and natural habitats. Even if the COP 21 climate goals are achieved, we will still see more abhorrent and extreme weather.

European logistics needs to be prepared to address this issue through smart and sustainable infrastructure. European inland ports believe that the TEN-T needs to take into consideration the necessity of climate-resilient infrastructure and logistics.

7) Core inland ports lacking core connections

The usage of less pollutant means of transport such as inland waterways and railways would significantly contribute to meeting this target. However, in many cases, the inland ports are unable to invest in improving their rail connections due to the ownership disputes

[9] https://www.eca.europa.eu/Lists/ECADocuments/LR_TRANSPORT/LR_TRANSPORT_EN.pdf

about the railway infrastructure. It has also been reported that there is an unwillingness in some Member States to improve the rail connections within the inland ports. Maintenance of railway infrastructure is often very costly which leads to the non-inclusion of some sections of the railways that are important for interoperability of the TEN-T network. In 2018, the European Court of Auditors also stated that, on a number of occasions, "inadequate maintenance of existing road, rail and river infrastructure in different countries of the EU, with implications for quality, safety, efficiency and sustainability"[10] has been reported.

Article 15 of the TEN-T Regulation requires inland ports to have rail or road connections. It is not written how the existing rail connections shall be developed. EFIP believes that the rail connections within a core inland port should also be designated as core part of the core network. Such a requirement is in line with Article 13 of the TEN-T Regulation which outlines that a priority for the TEN-T network should be, where appropriate, the connection of railway transport infrastructure with inland waterway port infrastructure. In addition, such measures would contribute to the core objective of the TEN-T regulations such as seamless movements of goods, reducing congestions and enhancing multimodality.

8) Specific issues to be considered in the review

France-Germany: In order to ensure rerouting possibilities along the Rhine-Alpine corridor when navigability is not possible the network needs to be expanded. The rail section Wörth (DE)-Lauterbourg (FR)-Strasbourg (FR)-Kehl (DE)-Appenweier (DE) is currently not included in the Rhine-Alpine Corridor and should be included to allow for logistical flexibility.

Romania: Currently only the port of Galati is a Core port, while Braila and Tulcea are part of the TEN-T comprehensive network. It should be highlighted that the ports of Braila and Tulcea together with port of Galati have a single port administration. This creates problems as these ports operate and suggest projects as a single entity. As a consequence, the ports of Galati, Braila and Tulcea should be recognised as a single Core Inland Port.

Denmark: The Port of Aalborg is currently not recognised in the network as a Rail-Road terminal. The port operates a connection to the Aalborg central station. All tracks have been renovated in 2015 to adhere to the TEN-T requirements. The Port of Aalborg hosts a number of freight terminals, allowing work on trains of over 350 meters in length for 24/7. Given those characteristics, the Port of Aalborg should be recognised as a Rail-Road terminal.

Serbia: Ports in Serbia constitute an essential part of the Danube inland waterway network. Currently the majority of Serbian ports are not recognised within the TEN-T network even

[10] https://www.eca.europa.eu/Lists/ECADocuments/LR_TRANSPORT/LR_TRANSPORT_EN.pdf

though they meet the requirements laid out in Article 14 (2) of 1315/2013. For instance, the port of Dunav has on average transhipped around 650 000 tonnes of freight in the period of 2016-2019. As such, all Serbian ports that meet the requirements in Article 14 (2) of 1315/2013 should be added to the TEN-T network.