



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

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As the unique representative of inland ports in Europe since 1994, EFIP comprises 200 inland ports located in 19 Member States of the EU and Switzerland, Serbia and Ukraine. The European inland ports fulfil the role of multimodal hubs that are essential in enabling green logistics. For inland ports **the Trans European Network – Transport (TEN-T)** is foundational in realising the European Green Deal goals.

EFIP welcomed the publication of the [TEN-T Guidelines Regulation proposal](#) in December 2021. The emphasis on **multimodal transport**, the integration of the **rail freight corridors**, the new **Good Navigation Status (GNS) inland shipping framework** and the increased focus on **climate resilience** are essential in ensuring the strength and success of European logistics in the future. These topics reflect the considerations that EFIP raised at the start of the [review](#) in 2019.

There are issues and points that the European inland ports feel the proposal does not address or does in a suboptimal manner. Specific legislative recommendations can be found [here](#).

EFIP raises the following considerations:

### 1) Maintain European environmental standards

The TEN-T proposal foresees new requirements to promote the environmental performance of inland vessels. These requirements are welcome and needed in the work to decarbonise the entirety of the sector and ensure environmentally friendly navigation. However, the proposed wording will likely result in the opposite.

Firstly, Article 21, 1 (c) lays down the requirements for environmental operations through a number of examples. It is however not clear if these examples constitute the minimum requirements or are only examples in the strictest case. It is therefore unclear what is expected of inland ports.

Secondly, this wording will jeopardise existing environmental and waste management legislation. For example, the CDNI<sup>1</sup> already dictates waste management, degassing and environmental performance infrastructure along the Rhine. The wording in Article 21 will lead to overlapping and conflicting legislation and lead to further legal uncertainty. **The wording on environmental navigation needs to be adapted to maintain existing environmental progress.**

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<sup>1</sup> Convention on the Collection, Deposit and Reception of Waste generated during Navigation on the Rhine and Other Inland Waterways



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## 2) Core inland ports need core rail connections

The increased usage of less pollutant means of transport such as inland waterways and railways is needed to achieve the European Green Deal. However, in many cases, inland ports are unable to invest in improving their rail connections due to the ownership disputes of railway infrastructure. In some Member States there is an unwillingness to improve rail connections within inland ports. Maintenance of railway infrastructure is often very costly, leading to the non-inclusion of some sections of railways that are important for the TEN-T network interoperability. 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”<sup>2</sup> has been reported.

Article 21 of the TEN-T proposal requires inland ports to have rail or road connections. It is not specified how the existing rail connections shall be developed. The inland ports call on **strong legal protections of existing rail connections** to ports. Additionally, EFIP believes that the **rail connections to core inland ports should be designated as part of the core rail network**.

## 3) Inclusion of the number of passengers as a criterion for designating an inland port as part of the TEN-T network

Article 20 of the proposal lays out the recognition criteria for comprehensive inland ports. These criteria do not recognise the changes that have been occurring in European inland ports in offering more services in passenger transport. Some inland ports are transforming more into dedicated passenger hubs than traditional freight centres, while other are expanding their hybrid role. This role for seaports is already recognised and inland ports offer similar services. In order to achieve the completion of the European network, **EFIP calls on passenger transport inland ports to be recognised**.

## 4) Prioritise inland waterway infrastructure development

The transport of goods in Europe is expected to increase in the coming years. In order to manage this increase, all modalities need to make an effort and cooperate in order to avoid stagnation of transport flows. Inland shipping has an enormous amount of free capacity available on the waterways, both in terms of waterway and vessel capacity. In addition, inland shipping is a CO<sub>2</sub>-friendly mode of transport that can contribute to the sustainable transport of the increasing flow of goods across Europe. A robust and reliable cross-border waterway network is an important condition for this. To maintain competitiveness and

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<sup>2</sup> [https://www.eca.europa.eu/Lists/ECADocuments/LR\\_TRANSPORT/LR\\_TRANSPORT\\_EN.pdf](https://www.eca.europa.eu/Lists/ECADocuments/LR_TRANSPORT/LR_TRANSPORT_EN.pdf)



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ensure the continuity of international goods flows, it is necessary to continue to **invest in cross-border waterways and in the infrastructure projects.**

Under the flexible approach that the new **GNS framework** foresees, a number of implementing acts will define specific criteria for individual river basin areas. These acts not only foresee the setting of requirements in relation to navigation but also for inland ports. This will be important to ensure that each river basin can host competitive inland shipping. It is however not foreseen how many implementing acts will be needed and what their reach will be. This should be **clarified to avoid undue administrative burden.**

### 5) Inclusion of the current class III inland waterways in the TEN-T network

Under the current TEN-T Guidelines Regulation, class III inland waterways (ECMT<sup>3</sup> classification) were not included. This results in little to no development on those waterways and the ports located along them. 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 economic activities in these regions.

Navigable waterways connected to at least class IV (in the current TEN-T regulation) or which do not meet the minimum requirements in sections but have the potential to reduce negative environmental effects, allowing for a modal shift from road to inland waterways, should be considered as a minimum option for the comprehensive network.

With regard to the core network (basic or extended), EFIP points out the need to include inland waterways that are part of the core network corridors and which have the status of waterways of international importance in accordance with the European Agreement on the Main Inland Waterways of International Importance (AGN).

A strengthening of inland navigation and a network approach can be achieved by supplementing the existing core network of inland waterways with a **comprehensive network of inland waterways that includes class III waterways.**

### 6) Multimodal planning needs to be cross-border

Under section 6 of the proposal, it is foreseen to expand and solidify the effectiveness of multimodal terminals. This includes a study from Member States to identify their current capacity and the needed capacity in the future.

This is indeed much needed but there are concerns about how this will work. Inland ports should also be consulted as they service the operators and can provide a strong network

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<sup>3</sup> ECMT refers to “the European Conference of Ministers of Transport”



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input. At the same time, during their analysis, **Member States should also look across the European network to avoid disconnected deployment of new terminals.**

The requirement to have each terminal able to service 740m-long trains is needed to support rail and multimodal transport. However, it must be noted that in urban areas there might not be sufficient space to adapt the terminals. This will therefore result in a lot of requests for derogations.

### Member State Specific Concerns

Alongside these general concerns and issues, EFIP would also like to raise a number of country-specific concerns that need to be addressed in the TEN-T Guidelines.

**France-Germany:** In order to ensure rerouting possibilities along the North Sea-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 North Sea-Alpine Corridor and should shift from the Rhine-Danube Corridor to the North Sea-Alpine one 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 the port of Galati, have a single port administration. This creates problems as these ports operate and submit 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 though they meet the requirements laid out in Article 14 (2) of TEN-T Regulation 1315/2013. For instance, the port of Dunav has transhipped on average around 650 000 tonnes of freight in the period 2016-2019. As such, all Serbian ports that meet the requirements in the aforementioned Article should be added to the TEN-T network.

**Poland:** In 2017, Poland ratified the AGN Agreement, sending a strong signal for a systemic approach to the modernisation and development of inland waterways running through the territory of the country that are important for the European network of inland waterways.



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The main category E waterways indicated in this agreement are covered by programme activities in the scope of their development, while conducting at the same time investment activities in the scope of their proper maintenance and ensuring good navigation conditions.

In particular, this concerns the connection of the sea- and inland ports in Szczecin and Świnoujście with the south of the country and Central Europe along the Baltic-Adriatic Transport Corridor through the Odra Waterway (E-30), along with the planned canal connection with the Danube, which should be included in this transport corridor.

**Austria:** The Port of Linz is currently not recognised in the network as a Core Port but rather as a Comprehensive Port. However, the Port of Linz is one of the largest trimodal transshipment centres on the upper Danube, with a proximity to the Blue Danube Airport and Linz city centre. The port has become a state-of-the-art logistics hub. It contributes to environmental and climate protection thanks to six OPS stations (and two more incoming by 2023), solar power generation, a tree planting campaign, promotion of e-mobility and planned investment in alternative fuels. Given those characteristics, the Port of Linz should be recognised as a Core Port.

**The Netherlands:** A number of ports are lacking in the proposal and need to be included. This includes the deletion of the ports of Deventer and Alphen aan de Rijn but also the continued exclusion of Alblasterdam, Harlingen, Doesburg, Doetinchem, Genemuiden, Hasselt, Zutphen, Zwartsluis, Coevorden, Foxhol and Veendam, even though these ports meet the requirements to be included. EFIP can provide data and figures to support these port inclusions.

Certain ports also need to be upgraded to Core status. The port of Venlo constitutes an essential regional and trans-European hub and should be recognised as such. There is no argument for them not to be recognised as Core Port during this revision.

The same argument stands for the Port of Zwolle. This port handles more than 6 million tonnes annually. Additionally, the Port of Zwolle, both the port itself and its rail connections, must be recognised in the North Sea-Baltic (Annex-3) corridor.