
Position of the European Federation of Inland Ports (EFIP), Inland Navigation Europe (INE) and the Inland Waterway Transport sector on the Alternative Fuels Infrastructure Regulation

Europe's inland ports, waterway authorities and the IWT sector as Enablers of Green Transport and Logistics are major contributors to deliver the EU Green Deal. Together they welcome the direction of the Alternative Fuels Infrastructure Regulation (AFIR) published under the Fit for 55 Package.

We welcome that the main proposals from the EFIP 2020 Position Paper on the [Alternative Fuels Infrastructure Directive](#), a **goal-based solution** and a **corridor approach**, are reflected in the published AFIR proposal. By not favouring specific fuels/energy sources, the sustainable fuel market can develop following the users' needs while the relevant infrastructure can be deployed as needed along the corridors.

Inland shipping plays an important role in the realisation of the emission reduction goals of the European Union. In its energy transition it is however strongly depending on the availability of sufficient alternative fuels and energy supply in both sea- and inland ports and along the entire network of navigable waterways.

In order to support the sustainable transition of the sector the AFIR needs to go further than it does in its current wording.

On-shore power supply

On-shore power supply facilities will be essential in decarbonising the inland waterway sector. Their deployment needs to be realised within the coming years and as such the AFIR sets a very ambitious goal.

In order to achieve all the goals put forward in the AFIR, we expect continued European support through CEF and other funding programmes. This is especially important as the business case in many situations is still lacking and situational challenges, such as lacking energy infrastructure, still need to be overcome.

Deployment and usage of OPS by the inland shipping sector will be very dependent on the reach and capacity of existing electric grids. The grid does not always reach to the quay side of the port area or in an effective manner. Additionally, inland cruise vessels require substantially more electricity and at a higher wattage. The existing grids are not always able to address these demands. **The AFIR does not address this challenge and this could make the deployment of the required OPS by 2030 impossible.**

From National Policy Frameworks to Corridor Frameworks

Battery, hydrogen and other sustainable fuels infrastructure must be deployed along a **corridor approach**. Installing all of said infrastructure in all inland ports is unfeasible. Fixed alternative fuels infrastructure in all ports could lead to oversupply in some areas and undersupply in others, as inland ports are not evenly distributed. Fixed targets for all ports would not always make economic sense and could result in underutilised or stranded assets.

Instead, infrastructure must be deployed in a way that serves waterway users, industry needs and geographic realities. As such the European corridors can be used to plan and coordinate the deployment of all alternative fuel's infrastructure along their corridors. At the same time interoperability between corridors should be safeguarded and fragmentation prevented.

To this end, we propose the TEN-T Corridors, together with their coordinators, are given a leading role within the creation, dialogue and implementation of the National Policy Frameworks (NPFs). They should deliver on the cross-border elements of the AFIR implementation. The aim is to seize the potential of alternative fuel system solutions in cooperation with industrial sectors in the corridors, enable economies of scale and contribute to a lower pricing of alternative fuels over a shorter time frame.

Legislative Suggestions:

Text proposed by the Commission

Proposed amendment

Article 10 - Paragraph 2 (NEW)

2. As of 1 January 2023 Member States shall take the necessary measures to ensure that the electricity grid is sufficiently extended, in connectivity and capacity, to ensure that the facilities pursuant to paragraph 1 are deployed.

Article 13 – paragraph 4

4. Where necessary, Member States shall cooperate, by means of consultations or joint policy frameworks, to ensure that the measures required to achieve the objectives of this Regulation are coherent and coordinated. In particular, Member States shall cooperate on the strategies to use alternative fuels and deployment of corresponding infrastructure in waterborne transport. The Commission shall assist the Member States in the cooperation process.

4. Where necessary, Member States shall cooperate, by means of consultations or joint policy frameworks, to ensure that the measures required to achieve the objectives of this Regulation are coherent and coordinated. **In particular, European Coordinators, in accordance with Article 45 of Regulation (EU) No 1315/2013, shall be delegated to coordinate and assist Member States as they shall create joint policy frameworks on the strategies to use alternative fuels and deployment of corresponding infrastructure in waterborne transport**



Europe's inland ports, Enablers of Green Logistics, are represented since 1994 by the European Federation of Inland Ports. EFIP consists of nearly 200 inland ports located in 18 Member States of the EU and Switzerland, Serbia and Ukraine.

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The European Barge Union (EBU) represents the inland navigation industry in Europe. Its members are the national associations of barge owners and barge operators of 9 European inland navigation countries (Austria, Belgium, Czech Republic, France, Germany, Luxemburg, Netherlands, Romania and Switzerland).

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The waterway authorities and bodies promoting waterway transport, represented by Inland Navigation Europe (INE), have the mission to optimise the physical, digital and green energy infrastructure for waterway transport and beyond.

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The European Skippers Organisation is the voice of the independent Inland Waterway Transport entrepreneurs. ESO looks after the interests of the barge owners at European level with representatives from six European countries (Belgium, France, Germany, Netherlands, UK and Poland).

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As an executive body of EBU and ESO, the European IWT platform aims at a stronger positioning of Inland Navigation in European and national transport policies by an intensified contribution to various governing bodies, working parties and standard setting committees like CESNI and ADN.

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