

Response of the European Federation of Inland Ports to the Commission staff working document towards Naiades II

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The European Federation of Inland Ports welcomes the Commission Staff Working Document entitled “Towards NAIADES II - *Promoting, greening and integrating inland waterway transport in the single EU Transport area*” as a good start for discussing the instruments needed to enhance the role of inland waterway transport in the European Transport system. In that respect, the title of the document perfectly summarizes the four important challenges to face:

- better **promote** the assets of IWT and help shippers to overcome the “barriers” to a first use of inland waterway transport
- pursue a policy in view of **safeguarding the sustainable character of inland navigation**
- **integrate** IWT into the comodal transport system
- create a **single European inland waterway transport system** by ensuring the navigability of a well defined inland waterway network, taking away the remaining bottlenecks on the network and aiming at uniform rules of navigation.

The European inland ports fully subscribe the general aim of the European Commission’s inland waterway policy. Indeed, given the potential inland waterway transport has in terms of sustainability and safety and given the growing congestion problem facing all other modes of transport, it is time to stop the decline in modal share of inland waterway transport. Moreover, it is time to wake up the inland waterway transport industry that its leading position as sustainable transport mode could be jeopardized if they do not invest in innovation and in further greening the sector.

The European Federation of Inland Ports gives it full support to an integrated vision of inland waterway transport, both in terms of content and in terms of budget.

- Contentwise, it is clear that inland waterway transport must be integrated into the comodal transport chain. An efficient inland waterway transport policy must therefore go

hand in hand with a policy highlighting and supporting the role of inland ports as multimodal connecting points.

- The financing of an inland waterway transport policy through the Connecting Europe Facility (infrastructure) and the Horizon 2020 (innovation) budgets must prevent that inland navigation is seen as an isolated mode of transport both in terms of infrastructure and operation. It is however important that within this multimodal approach the potential and specificity of inland waterway transport is being fully recognised. EFIP hopes that the projects dedicated and budget spent to inland waterway transport and inland ports will raise in the period 2014-2020 compared to 2007-2013 and that IWT and inland ports will be awarded a fair percentage of the overall budget.

Possible measures

Infrastructure is the first priority

The staff working document identifies inland ports as key components of the multimodal corridor infrastructure. A well-dimensioned network of inland ports is a pre-condition to enhance the share of inland waterway transport. For the Commission this implies a network of accessible inland ports with sufficient quality and capacity for transshipment and logistic facilities.

For EFIP it is clear that **infrastructure is the first priority for unleashing the potential of inland navigation**. Developing the missing links and taking away the remaining bottlenecks in view of obtaining a **seamless European inland waterway network** must be a first action point. Moreover, safeguarding the navigability through a **good maintenance** and regular dredging operations is a second priority.

It should also be clear that inland waterway infrastructure refers in this context not only to the fairway infrastructure, but also to the **inland port infrastructure** both in terms of loading and unloading facilities and equipment allowing for the integration of inland waterway transport in the multimodal transport chain and in terms of logistic and storage capacity.

EFIP pleads for a stable medium and long term waterway transport infrastructure strategy, allowing the inland ports and other potential investors to make the necessary choices. **Planned and agreed investments or funding schemes may not be put into question.**

EFIP also welcomes the reference the Commission is making to better spatial planning in view of stimulating manufacturers to locate close to waterways and freight terminals. In fact, **industrial spatial planning** is almost as important for multimodality as transport policy. A good spatial planning will allow the bundling of activities and as a result also the bundling of volumes. Moreover by creating integrated clusters, unnecessary transport movements are avoided and multimodal transport becomes more attractive.

EFIP believes the proposed new TEN-T policy - both the guidelines and the Connecting Europe Facility - will allow for a further development and consolidation of the European inland waterway

transport network as one of the main pillars of Europe's multimodal TEN-T network. The new TEN-T policy will certainly contribute to upgrading Europe's inland waterway and port infrastructure in a harmonised way.

However, Europe's new infrastructure policy will only deliver if:

- this new TEN-T policy can count on an adequate budget;
- if not only the inland waterway network is well defined, but if the network of multimodal inland ports is also being clearly defined and optimised; a clear list of the core and comprehensive inland ports must be integrated into the TEN-T guidelines proposal;
- if the governance of the multimodal corridors is "multimodal": all modes and all nodes must be considered on an equal footing, each with its specificity and characteristics.

Developing **guidance for the integration of inland ports and inland navigation into the TEN-T multimodal corridors** seems in that respect a good starting point. But, to achieve a real multimodal approach when implementing the multimodal corridors, guidance will be needed at different levels, not only at the level of the coordinators, but also at the level of all the stakeholders concerned. Some awareness raising actions towards the different modes and nodes seems to be advisable. Speaking about inland waterway infrastructure and its integration into the corridors, it also seems important to involve experts from non-EU countries that are linked to the corridor or the river basin that forms a part of the corridor.

Even if EFIP fully supports the approach chosen by the Commission to consider only the Class IV waterways as part of the TEN-T network and the TEN-T core network, the benefit of **smaller waterways** as feeder lines to the TEN-T inland waterway network should also be recognised as a way to promote and enhance the share of inland waterway transport.

Under the heading "infrastructure" the Commission engages itself to **promote the inland waterway friendly seaport designs and operations** so as to improve the share of hinterland transport for inland navigation where opportunities for this mode of transport exist. EFIP welcomes this engagement. The combined effect of a policy obliging seaports to develop sustainable hinterland connections and the reality of continuously growing volumes in the big sea ports has encouraged European sea- and inland ports over the past years to cooperate, develop partnerships in different forms and at different levels. Even if there is a strong will to cooperate and to work together, a lot remains to be done, not at least at infrastructural level. EFIP therefore believes that a policy enhancing the coordinated development of inland waterway equipment and facilities in seaports deserves more attention. Ideally the inland waterway-friendly seaport designs and operations should be combined with seaport-friendly designs and operations in inland ports. EFIP believes that initiatives enhancing inland waterway transport handling operations in seaports and corresponding developments in inland ports should be supported by the future CEF programme. For EFIP it is clear that **inland ports and seaport authorities and managers are**

partners when it comes to enhancing the inland waterway transport operations in between them.

Finally, in view of giving inland waterway transport the role and the future it deserves, it is essential to **anchor the transport function of the European waterways** by restoring the balance between the different functions of the waterway infrastructure on the one hand and by guaranteeing the navigability of Europe's waterways on the other hand. Unlike other modes of transport, inland waterways do not only serve transport needs. Inland waterways also have an energy, water supply, recreational, touristic, agricultural/fishery function.

Markets

EFIP recognizes that a detailed and harmonised market observation in the field of inland waterway transport and more importantly inland ports is lacking. EFIP is giving its full support to all initiatives helping the sector to assess in detail the trends, developments and needs and to prove the economic importance of inland waterway transport and inland ports.

Some European inland ports already call on an expert to advise shippers how to reverse their transport habits in favour of the use of inland waterway and intermodal transport. This approach seems to be successful. EFIP supports in that sense the development and support of a network of neutral logistic facilitators.

EFIP is very pleased that attention is being paid to the **challenges urban inland ports are facing**. Urban inland ports have indeed a role to play in the urban freight distribution and this at two levels: first, to bring freight in a sustainable way as near as possible to big urban agglomerations, making the last urban mile as short as possible. Second, to transport goods within the urban agglomeration through the development of innovative concepts (pallet transport, barges serving as logistic platform,...). EFIP therefore hopes that urban inland ports will be integrated in the initiatives and policy being developed by the Commission in view of achieving zero-emissions urban logistics.

Finally, EFIP acknowledges that the Commission will evaluate the need for an **EU inland ports policy**. So far, inland ports haven't been subject to studies or research about the need to develop such a policy. The questionnaire that has been developed recently addressing also inland ports can be seen as a first step to identify the inland ports, their needs and their challenges. EFIP believes it is important to **first carefully assess the results of this questionnaire before deciding on the next steps to take**.

Fleet

As stated above, it is important for the inland waterway transport industry not to lose its leading position in terms of overall environmental friendliness. EFIP is therefore giving its full support to the setting up of an Expert Group on emission reduction for IWT. Moreover, EFIP believes that

funding should be made available for the design of green and innovative vessels and if needed for the renewal of the fleet.

In addition, the following research activities should be supported:

- Investigating the possible use of vessels with a smaller draught, especially looking at their ecological benefits and economic feasibility. The extra costs of an additional transshipment and the need to develop a seamless European inland waterway transport chain are in that respect important factors to take into account.
- Investment and research into innovative vessels to be used on smaller waterways

Finally, EFIP welcomes the idea to look to what extent RIS could be developed into an instrument that makes information available to the transport logistics with a view of integrating IWT into the comodal chain.

Jobs and Skills

EFIP believes that some attention should also be given to the port and logistical staff on shore. Certainly in Eastern European ports, there is a lack of staff specialised in logistics. **A multilateral European exchange programme between inland port staff of different ports** could be a way for inland ports to connect and for staff to exchange know how and best practices.

Information exchange and sharing

EFIP acknowledges that information gathering and exchange is an important tool to make inland waterway transport play its role in the comodal transport chain. EFIP believes that a multimodal information sharing and exchange should be the final aim. However, the first priority is to improve the market information on inland waterway transport as such. Once comparable data on inland ports and inland waterways exist, these data should be integrated in a more multimodal scheme.

Inland Waterway Transport governance at EU and international level

EFIP believes the **differences in regulatory systems between river basins and within a river basin should be avoided**. Since international rivers are in most of the cases not stopping at the EU borders, inland waterway transport faces the specificity that different levels of governance work in parallel. EFIP therefore shares the Commission's view that a better division of tasks between the different international organisations and a better coordination of the work done at different levels could contribute in making the decision making in the sector more dynamic and efficient.

The proposal of the Commission to identify a single international body to tackle new policy issues is acceptable if this body involves all stakeholders in an open en transparent way. Attention should

in that respect also be paid to the non EU countries. Since EU and non EU countries are often naturally linked by one river basin, it is important that there is a continuous dialogue between both to prevent unnecessary disparities in regulations.

In any case, national measures restricting navigation on one stretch of an international waterway should not longer be permitted.

EU's financial instruments

So far neither in terms of projects, not in terms of budget European inland ports have been benefiting a lot from the **TEN-T funds** available. EFIP realizes that changing this implies the integration of inland ports and the recognition of their role into the TEN-T policy on the one hand and an increasing effort of inland ports to seize the possibilities offered under the existing TEN-T policy and the future TEN-T policy (CEF).

The staff working document also announces a **consultation process linked to the issue of infrastructure charging for IWT**.

EFIP believes that a clear distinction should be made between the internalisation of external costs on the one hand and infrastructure charging on the other hand.

EFIP is in favour of the internalisation of external costs in all modes of transport. The internalisation of external costs of transport (= let users pay for the external costs of transport in terms of noise, congestion, air pollution, ...) could lead to the use of more environmentally friendly modes of transport (awareness of shippers) and motivate each mode of transport to look at ways to lower its external costs. This could motivate the inland waterway transport industry to step up its efforts to further strengthen its green image.

The infrastructure charge (=making users pay for the cost of new infrastructure or for the maintenance of existing infrastructure) is of a completely different nature and is certainly for inland waterway transport a difficult issue. Transport is not the only user of an inland waterway. Development/ Maintenance of a waterway often serves different goals (recreation, water supply, energy, tourism, fisheries...). If transport is paying for the use of inland waterways, also the other users should be paying. Moreover, introducing infrastructure charging on existing waterways that are now being used free of charge could burden IWT again and lead to a modal backshift. The fear is that infrastructure charging would seriously affect IWT without creating any environmental benefit.