



EFIP

European Federation of Inland Ports
Fédération Européenne des Ports Intérieurs
Europäischer Verband der Binnenhäfen

TEN-T and Connecting Europe Facility

Response of the European Federation of Inland Ports to the Commission Proposals of 19 October

February 2012

Executive Summary

The European Federation of Inland Ports fully subscribes the aim of this review, e.g. to establish a complete and integrated TEN-T network covering all regions, to aim for a balanced development of all transport modes, to strengthen the role of the nodes and to take into consideration the Transport White paper goals in terms of reduction of GHG emissions.

The European **inland ports believe they have an important role to play** in integrating the different modes of transport and serving as modern multimodal connecting points in the European inland transport network. Indeed, inland ports are more than just an entry and exit gate on the waterway.

Inland ports are facilitating the integration of inland waterway transport into the comodal transport chain. More and more inland ports are developing towards an efficient interface where different transport modes are coming together. They are in fact taking up **the function of “transport market place”**, a platform where freight transport users can choose and combine modes in function of the product, the destination, the client, the cost (both internal and external).

EFIP acknowledges that it is the **first time that Europe’s infrastructure policy is recognising the role inland ports** can play in enhancing the potential and capacity of multimodal transport.

In that respect, EFIP is giving its **full support** to:

- the thresholds and criteria put forward by the Commission for the inclusion of inland ports in both the comprehensive and core network: these thresholds are fair and balanced;

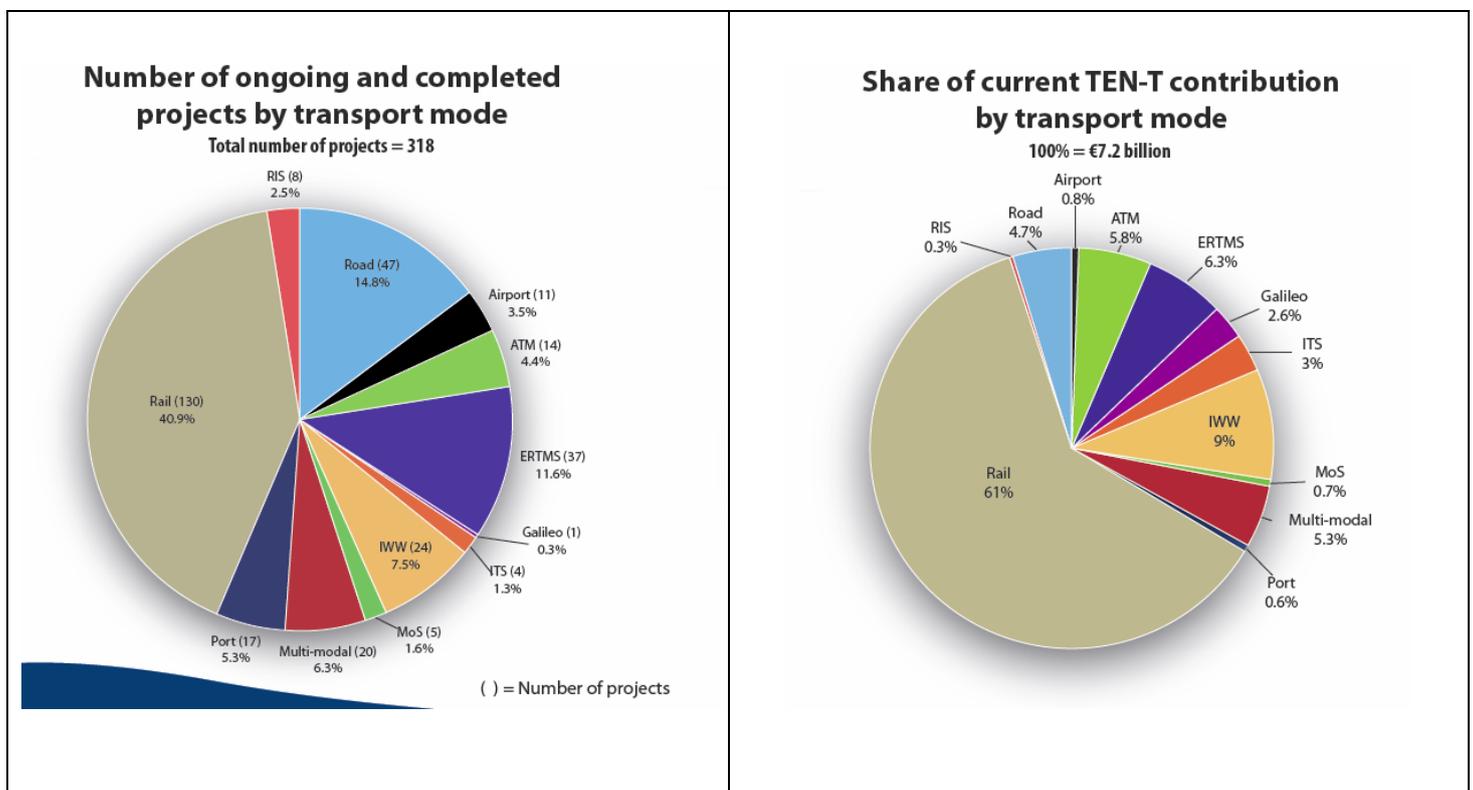
- the multimodal approach when designing the network and the development of multimodal corridors, as a tool to integrate inland waterway transport and inland ports in the multimodal transport chain;
- the choice of legal instrument: the choice for a regulation shows that this review exercise is not free of engagement and that a binding instrument is the only way to guarantee delivery.

Even if the aim and priorities put forward in this review enjoy the full support of EFIP, we believe that there are still **some points to be clarified** and **there is room for improvement**:

- It seems that some member states do not share the same interest in inland ports as the Commission and have not transmitted all inland ports meeting the criteria to the Commission services. **The current maps are therefore not complete in some areas.** EFIP counts on the Council (Member States) and the European Parliament to complement the list/maps of inland ports and hopes that all inland ports that meet the criteria put forward by the Commission will be identified into the TEN-T maps and the list of pre-identified projects in the course of the legislative procedure.
- The only reference in the Commission proposals to the status (core or comprehensive) of the different inland ports are the maps in the Annex to the guidelines, where core ports and comprehensive ports are indicated with a slightly different symbol. For some regions, it is very difficult to assess which ones are meant to be in and which ones are part of the core network. EFIP welcomes the intention of the Commission to provide a list of inland ports, but would **urge the Commission for reasons of transparency and clarity, to make this list publicly available** through publication on the Commission website. Moreover, to be consistent with the approach chosen for core seaports and core airports, the **core inland ports should be listed in the Annex II** of the guidelines proposal.
- **The presence and role inland ports are playing in the list of pre-identified projects needs to be clarified.** Even if a selection of inland ports have been identified as “core inland ports”, they have not been identified in the list of pre-identified projects. EFIP stresses the need to complete the list of pre-identified core network corridors by integrating the inland ports and related projects of importance on those corridors.
- The **term “ports”** refers in some cases to both inland and maritime ports. In other cases only maritime ports are meant. This should be clarified. It seems in that respect preferable to speak about “inland ports” and “maritime ports”.
- **The multimodal approach should be carried throughout the proposals**, in particular as regards the funding rates, definitions, implementation and governance of the multimodal corridors. A more balanced development of transport modes should be guaranteed during the implementation.

- Even if EFIP supports in principle the criteria for the integration of inland ports in to the core network, it realises that on the basis of these criteria, it is very difficult to lift up inland ports into the core network in some countries. This is for instance the case for Romania, where inland ports (ex. port of Galati) at this moment lack multimodal connections at “core level”. It is in that respect difficult to identify an inland port that is situated at the crossing between a core IWW and a core rail link. It therefore seems advisable to apply the criteria in a more pragmatic way in these exceptional cases, taking into consideration their potential to develop.

So far **neither in terms of budget nor in terms of projects, inland port projects and inland waterway projects have been well represented in the TEN-T policy.** This results very clearly from the charts below.



(source : http://tentea.ec.europa.eu/download/publications/agency_in_numbers_0611_final.pdf)

EFIP therefore urges the European policy makers not only to secure the foreseen budget of 31,7 Billion Euro but also to **realise a “modal shift” in the budget spent on the different modes of transport in favour of inland ports and inland waterway projects.**

Furthermore, EFIP asks the European Parliament and the Council to grasp the importance and added value of a completed, up-to-date, integrated, and well functioning transport infrastructure network for the internal market and for Europe’s economy as a whole.

In addition, EFIP stresses that to be fully functional the TEN-T infrastructure should be accompanied by a real European internal market for transport services in all transport modes.

To conclude, EFIP hopes the role of inland ports can be further enshrined into this TEN-T review. **Being a “TEN-T (core) port” should be more than just a nice label.** EFIP hopes inland ports will be really involved and integrated in the governance and implementation of the multimodal corridors.

Detailed analysis and proposal for amendments

EFIP has developed different amendment proposals to clarify the Commission proposals of 19 October and to come to a legislative framework that fully recognizes the role inland ports can play in the development and the functioning of a comodal and sustainable European transport chain.

The amendments below are presented in the order of the articles.

The Guidelines (COM (2011)650)

Article 8, (d) bis new: Enhancing the cooperation with third countries

European inland waterways do not stop at the EU borders. The regional approach taken in the Danube Strategy should also be carried in this review of Europe's TEN-T policy. The development of inland waterways and the facilitation of inland waterway transport on waterways that link the EU with its neighbouring countries should as a result also be considered as a project of common interest in the sense of article 8, since the development of a inland waterway transport project can only be successful if the whole corridor/river basin is taken into consideration.

Commission proposal	Proposal for amendment
<p>Article 8, paragraph 2</p> <p>2. The Union may cooperate with third countries to promote projects of mutual interest.</p> <p>These projects shall seek to:</p> <p>(a) promote the interoperability between the trans-European transport network and networks of neighbouring countries;</p> <p>(b) promote the extension of the trans-European transport network policy into third countries;</p> <p>(c) facilitate air transport with third countries, in particular by extending the Single European Sky and air traffic management cooperation;</p> <p>(d) facilitate maritime transport and promote motorways of the sea with third countries.</p>	<p>addition to be inserted after article 8, paragraph 2, d))</p> <p>2. The Union may cooperate with third countries to promote projects of mutual interest.</p> <p>These projects shall seek to:</p> <p>(a) promote the interoperability between the trans-European transport network and networks of neighbouring countries;</p> <p>(b) promote the extension of the trans-European transport network policy into third countries;</p> <p>(c) facilitate air transport with third countries, in particular by extending the Single European Sky and air traffic management cooperation;</p> <p>(d) facilitate maritime transport and promote motorways of the sea with third countries.</p> <p>(d) bis (new) "facilitate inland waterway</p>

	<i>transport with third countries”</i>
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Article 16, paragraph 3: level playing field in the definition of port-associated equipment

When defining the infrastructure components of the inland waterway infrastructure it is important to guarantee that inland ports, where applicable, are defined in a comparable way as railway stations (freight) and maritime ports:

- The equipment for the loading and unloading of cargo in stations is considered as a component of the railway infrastructure (see article 12, paragraph 3). It seems in that respect logical that the equipment for loading and unloading of cargo is also considered when determining what belongs to the inland port associated equipment.
- The equipment for ice breaking, hydrological surveys, dredging and maintenance of the port and port approaches is considered as equipment associated with maritime transport infrastructure (article 24, paragraph 3). These equipments which aim at guaranteeing the access to the port the whole year round, should also be considered as equipment associated with inland port infrastructure.

Commission proposal	Proposal for amendment
Article 16, paragraph 3	Article 16, paragraph 3
Port-associated equipment shall enable in particular propulsion and operating systems which reduce pollution, energy consumption and carbon intensity. It includes waste reception facilities.	Port-associated equipment shall <i>include the loading and unloading of cargo in ports, logistic platforms and freight terminals, the equipment for ice breaking, hydrological surveys, and dredging and maintenance of the port and port approaches</i> <u>and</u> enable in particular propulsion and operating systems which reduce pollution, energy consumption and carbon intensity. It includes waste reception facilities.

Article 17, paragraph 2: confusing use of the term “port operator”

It is not clear what is meant by the term “port operator” in this context. It seems that the Commission is in essence referring to the term “port authority” (landlord type ports) or in other cases to the company managing the port. EFIP believes it is better not to use the term “port operator” and just to speak about “the body governing the inland port”, which has to guarantee that at least one of its terminal is open to “all users” for loading and unloading.

Commission proposal Article 17, paragraph 2	Proposal for amendment
Port operators shall ensure that any inland port offers at least one freight terminal open to all operators in a non-discriminatory way and apply transparent charges	The body governing the inland port shall ensure that at least one freight terminal is open to all users in a non-discriminatory way and apply transparent charges

Article 18 : promotion of inland waterway transport

To be on an equal footing with the road transport infrastructure section (promotion road safety) and the maritime transport infrastructure section (promotion motorways of the sea) of the comprehensive network, it seems reasonable to add the promotion of inland waterway transport into the framework for priority inland waterway infrastructure development. Furthermore, such a reference is needed to ensure the proper continuation of the current Naïades programme.

Article 18	Proposal for addition, add d) bis (new)
	<p><i>Member States and other project promoters, when promoting projects of common interest and in addition to the priorities set out in Article 10, shall give particular consideration to:</i></p> <p>.....</p> <p><i>d bis) <u>the promotion of inland waterway transport</u></i></p>

Article 36, (d): The role of inland ports in urban nodes

Europe's policy on greening urban mobility should not only focus on greening the urban delivery, greening the urban last mile. The goods should also be brought into the urban agglomeration using one of the more sustainable transport modes. Using inland waterways or rail transport to bring the goods in (near to) the town, implies space for transshipment and logistic platforms in town. It is important to specify the role urban nodes can (should) play in facilitating the use of sustainable long distance modes of transport and the link between those and the last urban mile.

Article 36, (d) Commission proposal	Article 36, (d) Proposal for amendment
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<p>Member states and other project promoters, when developing the comprehensive network in urban nodes shall aim to ensure:</p> <p>....</p> <p>(d) seamless connection between the infrastructure of the comprehensive network and the infrastructure for regional and local traffic, including logistic consolidation and distribution centres;</p> <p>.....</p>	<p>Member states and other project promoters, when developing the comprehensive network in urban nodes shall ensure:</p> <p>....</p> <p>(d) seamless connection between the inland waterway and railway infrastructure of the comprehensive network and the infrastructure for regional, local traffic and urban freight delivery , including logistic platforms, consolidation and distribution centres;.....</p>
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Article 47, paragraph 1: clarify the role of inland ports in the core network

Like for maritime ports, the European Commission has developed a series of criteria determining which comprehensive inland ports should be taken up in the core network. On this basis, the following comprehensive inland ports should be part of the core network:

- Inland ports situated in an urban node (see list Annex II, 1a)
- Inland ports situated at the crossing of a core inland waterway and a core railway link.
- Inland ports meeting the throughput criteria of core seaports.

For EFIP, these criteria are balanced. EFIP however deplores that the only reference to the presence of inland ports in the core network are the maps in Annex I. Neither the criteria for taking up an inland port in the core network, nor a list of core inland ports (as it exists for maritime ports) is integrated in the proposal.

EFIP therefore asks to add a reference in article 47 dealing with “the nodes of the core network”. Furthermore the European inland ports believe a list of the core inland ports in Annex II would make the proposal less confusing. A symbol indication in the maps is not sufficient.

Moreover, since the term “port” is not defined in this regulation, it seems advisable to mention here explicitly “maritime and inland ports” since it is the Commission’s intention to consider both categories as core ports, when established in an urban node.

<u>Commission proposal</u>	<u>Proposal for amendment</u>
<p><i>Article 47</i></p> <p><i>Nodes of the core network</i> 1. The nodes of the core network are set out in Annex II and include:</p>	<p><i>Article 47</i></p> <p><i>Nodes of the core network</i> 1. The nodes of the core network are set out in Annex II and include:</p>

<ul style="list-style-type: none"> – urban nodes, including their ports and airports; – maritime ports; – border crossing points to neighbouring countries. 	<ul style="list-style-type: none"> – urban nodes, including their maritime and inland ports and airports; – maritime ports; – inland ports; – border crossing points to neighbouring countries.
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Article 47, paragraph 2: inland waterway transport as hinterland connection for core maritime ports

Maritime *comprehensive* ports (see article 26) have to be connected with roads, railways and, where possible, inland waterways. As a result, when defining *core* maritime ports, it seems logical to mention next to the need for an adequate railway connection by 2030, also the need for an adequate inland waterway connection by 2030. This is important in view of guaranteeing sustainable hinterland connections. Of course this obligation should only count for maritime ports that can reasonably be linked with inland waterways.

<u>Commission proposal</u>	<u>Proposal for an amendment</u>
<p>2. Maritime ports indicated in Part 2 of Annex II shall be connected with the railway and road transport infrastructure of the trans-European transport network by 31 December 2030 at the latest, except in duly justified cases.</p>	<p>2. Maritime ports indicated in Part 2 of Annex II shall be adequately connected with the railway, road and where possible, inland waterway transport infrastructure of the trans-European transport network by 31 December 2030 at the latest, except in duly justified cases.</p>

Article 49: Definition of core network corridors

The Commission clearly emphasizes the importance of enhancing the potential of multimodal transport and stresses in that respect the important role of the multimodal connecting points, e.g. inland ports, seaports and urban nodes. As a result, the maps foreseen in Annex I of the Guidelines proposal identify a number of core inland and seaports. Whereas there is a clear reference to the role seaports are to play in the core network corridors (see article 49, paragraph 3), there is no reference whatsoever to inland ports in that respect. It is important to include a reference in the guidelines to the role inland ports are to play in the multimodal core network corridors and to identify these inland nodes in the multimodal corridors, since inland ports will contribute largely in making the use of the multimodal corridors effective.

	Article 49, paragraph 3bis (new) to be added
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	3bis. Core network corridors shall include the inland ports laying on these corridors, which are identified as core ports in Annex I.

Article 52: Governance of core network corridors

EFIP supports the multimodal approach taken in this TEN-T review. Indeed it is important to develop a transport infrastructure which allows transport users to combine modes in an optimal way depending on the product, the distance, the geographical situation, the cost (both internal and external),etc.

It is however important that this multimodal approach is fully pursued in the implementation and governance of the multimodal corridors. It seems in that respect too narrow to just mention the rail infrastructure managers in article 52. All infrastructure managers of the modes represented in the corridor should be equally involved in this governance. Since seaports and inland ports are to play an important role as “node” in this TEN-T review and in the multimodal corridors in particular, it is also important to involve them in the governance of the corridors concerned.

<i>Article 52, paragraph 2</i>	<i>Article 52, paragraph 2</i>
The corridor platform shall be composed of the representatives of the Member States concerned and, as appropriate, other public and private entities. In any case, the relevant infrastructure managers as defined in Directive 2001/14/EC of the European Parliament and of the Council of 26 February 2001 on the allocation of railway infrastructure capacity and the levying of charges for the use of railway infrastructure⁶⁰ shall participate in the corridor platform.	The infrastructure managers of all transport modes at the different levels concerned shall participate in the corridor platform. The corridor platform shall be composed of the representatives of the Member States concerned and, as appropriate, other public and private entities. The bodies governing the sea and inland ports included in the corridors shall also participate in the corridor platform.

<i>Recital 29</i>	<i>Recital 29</i>
In developing core network corridors due account should be given to the rail freight	In developing core network corridors a balanced development of all transport

<p>corridors set up in accordance with Regulation (EU) No 913/2010 of 22 September 2010 of the European Parliament and of the Council concerning a European rail network for competitive freight²⁵ as well as to the European Deployment Plan for ERTMS provided for in Commission Decision 2009/561/EC of 22 July 2009 amending Decision 2006/679/EC as regards the implementation of the technical specification for interoperability relating to the control-command and signalling subsystem of the trans-European conventional rail system.</p>	<p><i>modes should be a first priority.</i></p> <p>Due account should be given to the rail freight corridors set up in accordance with Regulation (EU) No 913/2010 of 22 September 2010 of the European Parliament and of the Council concerning a European rail network for competitive freight²⁵ as well as to the European Deployment Plan for ERTMS provided for in Commission Decision 2009/561/EC of 22 July 2009 amending Decision 2006/679/EC as regards the implementation of the technical specification for interoperability relating to the control-command and signalling subsystem of the trans-European conventional rail system.</p>
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Annex I – maps of the comprehensive and the core network

To know if an inland ports is considered as a “comprehensive inland port” or a “core inland port” in the sense of the TEN-T proposals, one has to rely on the maps in Annex I of the Guidelines proposal, where the inland ports are indicated with a symbol. In areas with a dense network of inland ports this results in a very confusing situation. The Commission is working on a list of the inland ports that are taken up in the maps.

EFIP urges the Commission to make the list of comprehensive ports publicly available on the Commission website and/or to better identify the ports on the maps. The core inland ports should be listed in the Annex II, as it is foreseen for the other core nodes of the network (core seaports, core airports and urban nodes).

EFIP recommends to take up the following ports into the TEN-T comprehensive or core network. Some of these ports have also been defined as core/comprehensive maritime port but are listed here since they have a substantial inland port function.

MS	NAME	CORE	COMPREHENSIVE
		Inland port	Inland port
AT	Enns	X	
	Krems		X

MS	NAME	CORE	COMPREHENSIVE
		Inland port	Inland port
	Linz	X	
	Wien	X	
BE	Antwerpen	X	
	Gent	X	
	PAC Charleroi		X
	Port du Centre et de l'Ouest		X
	PAL Liège	X	
	PAN Namur	X	
	Port of Aalst		X
	Port of Albertkanaal	X	
	Port of Avelgem		X
	Port of Brussels	X	
	Port of Kortrijk-Bossuit	X	
	Port of Roeselare		X
	Port of Willebroek		X
BG	Lom		X
	Orjahovo		X
	Ruse	X	
	Silistra		X
	Vidin	X	
CZ	Decin	X	
	Lovosice		X
	Melnik	X	
	Pardubice	X	
	Praha	X	

MS	NAME	CORE	COMPREHENSIVE
		Inland port	Inland port
	Usti n. labem		X
DE	Aken		X
	Andernach		X
	Aschaffenburg		X
	Bendorf		X
	Berlin	X	
	Bonn		X
	Braunschweig	X	
	Breisach		X
	Bremen	X	
	Bremerhaven	X	
	Deggendorf		X
	Dormagen		X
	Dörpen		X
	Dorsten		X
	Dortmund	X	
	Dresden	X	
	Duisburg	X	
	Eberswalde Havel-Oder-Wass.		X
	Emmelsum/Wesel		X
	Emmerich		X
	Frankfurt-Main	X	
	Gelsenkirchen		X
	Germersheim		X
	Gernsheim		X

MS	NAME	CORE	COMPREHENSIVE
		Inland port	Inland port
	Hamburg	X	
	Hamm	X	
	Hannover	X	
	Heilbronn		X
	Hildesheim		X
	Karlsruhe	X	
	Kehl	X	
	Kelheim		X
	Koblenz	X	
	Köln	X	
	Königs-Wusterhausen		X
	Krefeld	X	
	Leer		X
	Ludwigshafen	X	
	Lübeck	X	
	Lünen		X
	Magdeburg	X	
	Mainz	X	
	Mannheim	X	
	Nürnberg	X	
	Neuss/Düsseldorf	X	
	Oldenburg		X
	Osnabrück		X
	Papenburg		X
	Peine		X

MS	NAME	CORE	COMPREHENSIVE
		Inland port	Inland port
	Plochingen		X
	Regensburg	X	
	Riesa		X
	Rosslau	X	
	Saarlouis/Dillingen		X
	Salzgitter		X
	Speyer		X
	Straubing		X
	Stuttgart	X	
	Trier		X
	Velten	X	
	Weil am Rhein		X
	Worms		X
	Wörth am Rhein		X
	Wolfsburg/Fallerleben	X	
EE	Tallinn	X	
ES	Sevilla	X	
FR	Arles		X
	Chalon Sur Saone	X	
	Lille	X	
	Lyon	X	
	Cambrai - Marquion		X
	Colmar		X
	Metz	X	
	Mulhouse-Ottmarsheim	X	

MS	NAME	CORE	COMPREHENSIVE
		Inland port	Inland port
	Nancy		X
	Nesle		X
	Nogent sur Seine		X
	Noyon		X
	Paris	X	
	Peronne		X
	Rouen	X	
	Strasbourg	X	
	Thionville		X
	Villefranche sur Saône		X
HU	Baja		X
	Budapest Csepel	X	
	Dunaujvaros		X
	Gyor-Gonyu		X
	Komarom	X	
	Mohacs		X
	Port Paks (terminal I)		X
	Szeged		X
IT	Chioggia		X
	Cremona		X
	Ferrara	X	
	Mantova		X
	Milano		X
	Monfalcone		X
	Porto Levante		X

MS	NAME	CORE	COMPREHENSIVE
		Inland port	Inland port
	Porto Nogaro		X
	Rovigo		X
	Venezia	X	
LT	Kaunas	X	
LU	Mertert	X	
NL	Alblasserdam		X
	Almelo		X
	Almere		X
	Alphen aan den Rijn		X
	Amsterdam	X	
	Arnhem	X	
	Bergen opZoom	X	
	Born		X
	Cuijk		X
	Den Bosch		X
	Deventer		X
	Dordrecht	X	
	Drachten		X
	Eemshaven		X
	Eindhoven		X
	Enschede		X
	Geertruidenberg		X
	Gennep		X
	Gorinchem	X	
	Gouda		X

MS	NAME	CORE	COMPREHENSIVE
		Inland port	Inland port
	Grave		X
	Harderwijk		X
	Helmond		X
	Hengelo	X	
	Kampen	X	
	Lelystad		X
	Lochem		X
	Maasbracht		X
	Maasdriel		X
	Maassluis		X
	Maastricht		X
	Meppel		X
	Moerdijk	X	
	Nijmegen	X	
	Nieuwegein		X
	Oosterhout		X
	Oss		X
	Reimerswaal		X
	Ridderkerk		X
	Roermond		X
	Rotterdam	X	
	Sneek		X
	Stein		X
	Terneuzen	X	
	Tiel	X	

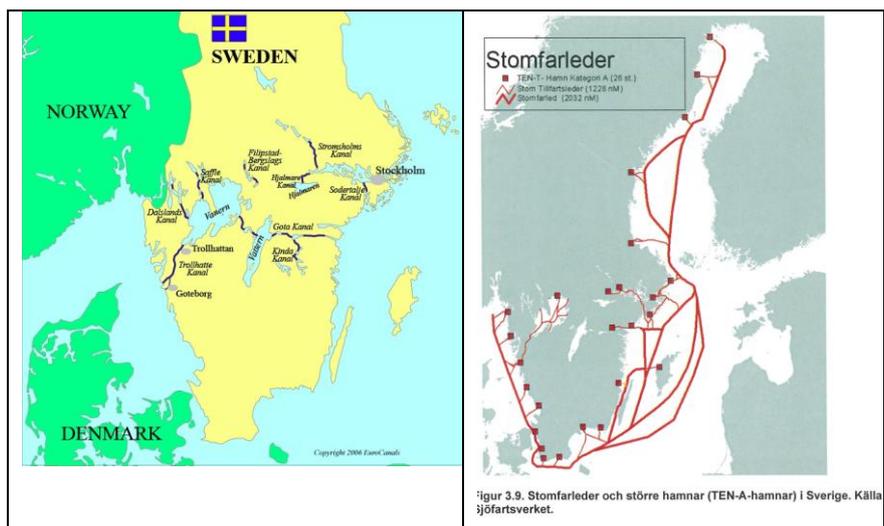
MS	NAME	CORE	COMPREHENSIVE
		Inland port	Inland port
	Tilburg		X
	Utrecht	X	
	Veendam		X
	Veghel		X
	Venlo	X	
	Waalwijk		X
	Wageningen		X
	Wanssum		X
	Werkendam		X
	Zaandam		X
	Zaltbommel		X
	Zevenaar		X
	Zuidhorn		X
	Zwartewaterland		X
	Zwijndrecht		X
	Zwolle	X	
PL	Police		X
	Świnoujście, Szczecin	X	
RO	Brăila	X	
	Calafat	X	
	Cernavodă	X	
	Constanța	X	
	Corabia		X
	Călărași		X
	Drobeta Turnu Severin	X	

MS	NAME	CORE	COMPREHENSIVE
		Inland port	Inland port
	Galați	X	
	Giurgiu	X	
	Medgidia		X
	Moldova Veche		X
	Oltenița		X
	Sulina		X
	Tulcea		X
SE	Vasteras		X
	Karlstad		X
SK	Bratislava	X	
	Komarno		X

Addition of Swedish inland waterways and inland ports

Swedish inland waterways are linking the Port of Goteborg with its hinterland and the Port of Stockholm with its hinterland. These waterways fulfil the criteria for inclusion into the TEN-T network. The Swedish authorities decided not to submit their inland waterways for inclusion into the TEN-T maps. By indicating however an inland port in the hinterland of Stockholm on the TEN-T map (Map 1 DK-EE-LV-LT-FI-SE), it is indirectly recognised that there are waterways that meet the TEN-T criteria.

In view of guaranteeing a level playing field between Member States, EFIP urges the Parliament and the Council to include the Swedish inland waterways and their corresponding ports, that correspond to the criteria put forward by the Commission, into the TEN-T map.



Annex II: add a list of core inland ports

At this moment, the core inland ports can only be identified through the corresponding anchor symbol on the maps in Annex I. For reasons of clarity and consistency, EFIP proposes to include a **list of the core inland ports**, featuring on the maps in Annex I of the proposal, in the Annex II, which features already the urban nodes, maritime ports and airports.

EFIP proposes to integrate the above mentioned core inland ports (p 11-20) in the list.

Annex II, part 3: integrate the border crossing point with neighbouring countries by inland waterways

EU Member State	Neighbouring country	Border crossing (road)	Border crossing (rail)	<i>Border crossing (inland waterways)</i>
ROMANIA	UKRAINE	Siret	Vicsany	<i>Danube (Ismail)</i>
	MOLDOVA	Ungheni	Ungheni	<i>Danube (Galati-Giurgiulesti)</i>
	SERBIA	Moravitsa	Moravitsa	<i>Danube (Prahovo)</i>
BULGARIA	SERBIA	Kalotina	Kalotina	<i>Danube (Prahovo)</i>
FRANCE/ GERMANY	SWITZERLAND	BASEL-Weil am Rhein-Mulhouse	BASEL-Weil am Rhein-Mulhouse	BASEL-Weil am Rhein - Mulhouse

1. General remarks

EFIP welcomes the idea of a single framework for investing into EU infrastructure priorities. Indeed, there is no point in developing guidelines for a complete and integrated Trans-European Transport network if this infrastructure policy is not accompanied by the needed financial instruments.

The European inland ports urge therefore the European Parliament and the Council to **stick to the financial envelope of 31,7 billion EUR** foreseen by the European Commission for the implementation of the Transport projects.

EFIP however believes that in view of achieving a balanced development of the different modes of transport it will be necessary to work on **a modal shift in the budget and reserve more means for ports and waterborne transport**. The charts developed by the TEN-TEA Agency (see page 3 of this position paper) are clear. **Under the current financial perspectives**, only 5,3% of the projects related to ports (sea and inland ports together!), and only 7.5% of the projects were inland waterway projects. In terms of budget, the results are even more outspoken: **only 0.6% of the budget spent was given to ports, only 9% was given to inland waterway projects. If one considers the pure inland port projects, only two studies have been completed so far with TEN-T support.**

But of course, **European inland ports do not aim for a blank cheque**. The projects supported should contribute to developing modern and high performing trans-European networks, to achieve the 20% reduction of greenhouse gas emissions and should ensure a greater economic, social and territorial cohesion within the European Union.

To EFIP, **the following inland ports and inland waterway projects should be given priority within the framework of the TEN-T:**

In areas with well developed inland waterways and a sufficient dense network of inland ports:

- investments aiming at the further integration of inland waterways into the comodal transport chain, through the development of adequate rail links to and from the port;
- investments in adequate locks and higher bridges to make the inland ports in the hinterland of big seaports “fit” for their role as hinterland hub, by making them in particular accessible for container inland waterway transport (3/4 layers) and short sea shipping;
- investments to integrate new infrastructure projects (ex. Seine Nord) into the overall inland waterway transport network, by lifting the new bottlenecks that could result from such infrastructure projects at the beginning and end of this new infrastructure.

In areas where the navigability of the waterways is not guaranteed (ex. Danube, Elbe) and/or where inland waterway transport is in a starting phase (ex. Italian waterways)

- investments in improving the navigability of the waterway;
- investments to come to a sufficient dense network of inland ports and well-equipped multimodal terminals (cranes, modern technologies, quay walls,...) with the aim to integrate inland waterway transport in the comodal chain and TEN-T network;
- investments in multimodal links between the comprehensive inland ports and the neighbouring core inland port (hub function);
- projects in view of assisting Member States administrations, which do not have know how in the field, to assess good inland ports projects in areas where the knowhow is not present.

Besides the following investments in inland ports should be considered for support:

- software measures enhancing the efficiency and innovation in land ports;
- sustainability measures;
- projects enhancing the safety;
- projects aiming at developing the “bridge function” of urban inland ports, the link between sustainable long distance transport and the last urban mile in big urban agglomerations;
- dredging works;
- investments in ports at the crossing point (EU- neighbouring countries, since these ports serve as IWW point of entrance to the Union).

2. Proposals for amendments on the CEF proposal

Article 2, (12): definition bottleneck

The definition of bottleneck only refers to a system break in continuity and is written from a pure railway infrastructure perspective (gradients, gauge,...).

Given the multimodal approach and the aim of the Commission to come to a balanced development of the different transport modes, EFIP proposes to broaden the definition by:

- referring as well to a disruption in capacity in the definition of bottleneck as it is the case in the current definition of “bottleneck in the field of transport” (cfr. (Regulation 680/2007, article 2, point 6).
- by removing the examples that only refer to railway transport infrastructure
- by adding locks to the infrastructure, that can absorb a bottleneck.

Commission proposal	Proposal for amendment
"Bottleneck" means a physical barrier that leads to a system break affecting the continuity of long-distance flows. Such a barrier can be absorbed by new infrastructure such as bridges or tunnels that address problems as for example gradients, curve radii, gauge. The need to upgrade existing infrastructure shall not be considered as a bottleneck;	"Bottleneck" means a physical barrier that leads to a system break affecting the continuity and disruption of transport capacity of the long-distance flows. Such a bottleneck can be absorbed by new infrastructure such as bridges, locks and tunnels that address problems as for example gradients, curve radii, gauge or by upgrading intermediate lower classified sections of infrastructure to the level of the rest of the network;

Article 10, paragraph 2, (c): funding rates for traffic management systems should be equal for all transport modes

The Commission aims at achieving a balanced development of the different transport modes. In that respect it seems advisable to make an equal level of co-financing possible for the different modes, certainly when it concerns traffic management systems.

Commission proposal <u>Article 10, paragraph 2, (c)</u>	Proposal for amendment <u>Article 10, paragraph 2, (c)</u>
(c) with regard to grants for traffic management systems and services: (i) the European Rail Traffic Management System (ERTMS): the amount of Union financial aid shall not exceed 50% of the eligible cost; (ii) traffic management systems, freight transport services, secure parkings on the road core network, as well as actions to support the development of Motorways of the Seas: the amount of Union financial aid shall not exceed 20% of the eligible cost.	(c) with regard to grants for traffic management systems and services: (i) traffic management systems: the amount of Union financial aid shall not exceed 50% of the eligible cost; (ii) traffic management systems, freight transport services, secure parkings on the road core network, as well as actions to support the development of Motorways of the Seas: the amount of Union financial aid shall not exceed 20% of the eligible cost.

Annex: part I : list of pre-identified projects on the core network in the field of transport

Core network corridors

A number of inland ports are considered as “core inland ports” in the maps (Annex to the guidelines regulation). In view of guaranteeing that these inland ports will also be playing an important role in the development and implementation of the multimodal core network corridors, which is seen as the main instrument for the implementation of the core network and which will absorb, the majority of the funds (80%), it is important that these inland ports and their projects are integrated in the list of pre-identified projects.

Corridor 1: Baltic-Adriatic corridor

- **add project: Port of Vienna: development of a multimodal container platform**

Corridor 2: Warsawa – Berlin – Amsterdam/Rotterdam – Felixowe –Midlands

- **add project: IWW connection between Mittellandkanal -Twentekanaal : studies**

In the past, some studies were done on this inland waterway connection, which would shorten substantially the existing inland waterway links between Rotterdam/Amsterdam and Berlin. Currently to sail from Rotterdam to Berlin, one has to go over the Rhine, the Wesel-Dattelnkanaal and Dortmund Ems canal. Given the new infrastructure developments on both the German side (Mittellandkanal) and the Dutch side (Twente), it would be interesting to carry out a new study on this inland waterway link.

- **complete project: West-German Canals, Mittellandkanal, Hannover – Magdeburg – Berlin IWW upgrading and development of multimodal platforms**

Corridor 3: Mediterrean corridor

- **add project: Sevilla- Cadiz – IWW – upgrading, studies and works**
- **add project: Sevilla – Port - upgrade multimodal connections**

Corridor 4: Hamburg – Rostock –Burgas/TR border – Piraeus – Lefkosia

- **complete project: Hamburg –Halle-Dresden-Praha-Pardubice – IWW – Elbe upgrading and development of multimodal platforms**
- **complete project: Decin locks: studies and works**

Corridor 6: Genova – Rotterdam Corridor

- **add project: Liège – Port, Rail, Airport – development of a multimodal platform (Trilogiport) and Rail - High speed rail freight connection (Liège Carex) – Liège airport**

Corridor 7: Lisboa – Strasbourg

- **add project: Paris – Ports several developments of multimodal platforms (Gennevilliers, Limay, Bonneuil-sur-Marne, Bruyères-sur-Oise, Montereau, Evry) and creation of a new multimodal platform (Port Seine Metropole)**

Corridor 8: Dublin – London – Paris – Brussel/Bruxelles Corridor

- **add project: Paris – Ports several developments of multimodal platforms (Gennevilliers, Limay, Bonneuil-sur-Marne, Bruyères-sur-Oise, Montereau, Evry) and creation of a new multimodal platform (Port Seine Metropole)**

Corridor 9: Amsterdam- Basel/ Lyon – Marseille

- **add project: Amsterdam- Terneuzen: : locks (Province of Zeeland)**
- **complete project: Terneuzen – Maritime – Locks: studies ongoing and works**
- **add project: Ghent – Port – Development of multimodal platforms for inland containers**
- **complete project: Waterways upgrade in Wallonia – IWW – Tournai – Condé – Mons – La Louvière – Charleroi – Namur : studies, upgrading**
- **add project: Brussels- Charleroi: upgrade bridges: studies and works**

Corridor 10: Strasbourg – Danube Corridor

- **add project: Strasbourg - Port - Interconnection of upper Rhine multimodal platforms**
- **add project: Linz- port- extension, electrification and modernisation of the port railway station**
- **add project: Enns – Port - development of new multimodal container terminal**
- **add project: Port of Vienna: development of a multimodal container platform**

- **add project: Ruse – port – development of a multimodal platform in Port Ruse East**
- **add project: Giurgiu-port- modernization and rehabilitation of port infrastructure: studies and works**
- **add project: Galati- port- modernization and rehabilitation of port infrastructure: studies and works**
- **complete project:** Main – Main-Donau-Canal – Danube (**Kelheim Constanta/Sulina**) - IWW - studies and works on several sections and bottlenecks; inland waterway ports: hinterland connections

Other sections on the Core network

- **complete project:** Inland waterways Dunkerque – Lille – Bottleneck – IWW – studies ongoing **and works**
- **add project: Ruse-Varna - Other core Network – Rail - upgrading**

The European Federation of Inland Ports (EFIP) represents more than 200 inland ports and port authorities in 19 countries of the European Union, Moldova, Switzerland and Ukraine.

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