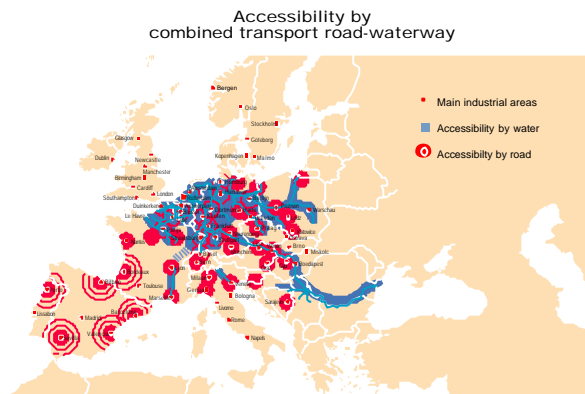


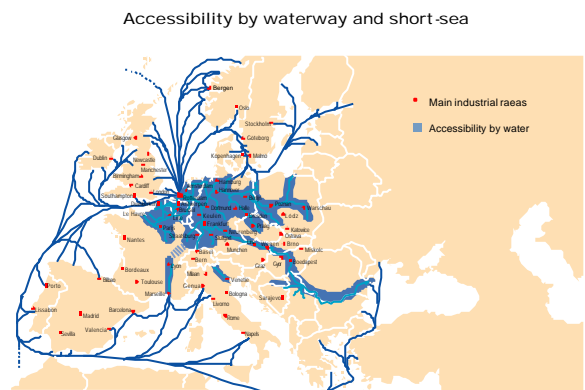
INE comments on the European Commission White Paper COM(2001)370

INE welcomes the strong willingness of the European Commission to enhance a modal shift in the forthcoming decade. This is indeed necessary to meet the demands of enlargement and sustainable development. The Commission rightly acknowledges the strong assets of inland shipping and detects most of the necessary actions to support this mode. However, the Commission lacks ambition to put forward a set of concrete proposals to support business in a realistic way.

Inland waterways do not only represent the safest and most environmentally friendly transport means, the network offers sufficient reserve capacity to meet increasing transport demand. Inland shipping volumes are growing thanks to cost-efficient and reliable services. The perception that inland navigation is only suited for the carriage of heavy low-cost commodities over long distances has been overtaken by nowadays reality. Floating stocks, innovative concepts and the start-up of intermodal partnerships correspond more and more with new logistics needs.



Source BVB



Source BVB

Inland navigation is indeed by nature intermodal and international. In t/km, 75% are cross-border services. Inland shipping complements other modes in the transport chain. It can force back congestion on road arteries and provide free capacity where railway infrastructure is lacking. In order to achieve an intermodal balance, the European Commission and the Member States must ensure **non-discrimination of treatment between means of transport**

causing less damage to society and transparency for all European and national support measures.

But inland waterways are more than just a transport mode. The European river and canal network is multifunctional and multi-used. The network does not only offer excellent possibilities for leisure activities along and on the waterways, it matters as much as water supply source (drinking water and agriculture), flood management and the production of hydroelectric power.

Inland navigation can become even more successful and useful to society, but it is time to act. In return for an active policy at European and national level removing the remaining bottlenecks and supporting positive measures, inland shipping offers concrete alternatives for shifting cargo to reliable, safe and environmentally sound transport. The chance of creating a framework for enterprise to flourish should not be missed.

INE calls upon the European Commission and the Member States to undertake the following concrete actions at the level of infrastructure, superstructure, ship and goods to boost the use of inland shipping in Europe. It is crucial to coordinate efforts because of the international character of inland navigation and transport in general. The ultimate goal is to attain a modal shift and sustainable growth.

1. Creating a coherent waterway network and optimizing existing infrastructure

1.1. Trans-European networks horizon 2010

Just as rail and short-sea shipping, inland navigation needs so-called "motorways" or "corridors" as well as appropriate infrastructure to organize seamless freight flows. The principles of non-discrimination between the modes are essential for the completion of the trans-European networks. Decision 1692/96/EC pointed out the main missing links and bottlenecks of the European waterway infrastructure. Since 1996, virtually nothing happened for inland waterways, while road projects come to completion and considerable amounts are spent to solve rail interoperability problems.

As for the **missing links**, INE insists on maintaining the **horizon laid down for 2010** and in particular:

- o Seine-Nord link
- o Rhine-Southern France link
- o Maas-Rhine canal
- o Integration of the Elbe-Odra-Danube network (in view of enlargement).

The Commission refers to the potentially negative environmental impact of new canal construction projects, but studies show very clearly that the external costs caused by new waterway projects are relatively low in comparison with other transport modes. Thanks to the multifunctional character of waterways, it is important to take into consideration the positive environmental impact of new waterway construction with regard to the creation of green space, flora and fauna. The construction of new waterways today is in full respect of wildlife and involves additional costs for creating natural river banks. This fact in combination with the environmentally friendly performance of waterway transport use raises no doubt about the less harmful impact of inland navigation upon society.

As for the **bottlenecks**, INE welcomes the European Commission's proposal to add "Straubing-Vilshofen" to the list of priority projects. INE calls upon the Member States and the European Parliament to support this proposal. It is however obvious that other bottlenecks, in particular inappropriate water and air (bridges) drafts as well as narrow locks, laid down in the **TEN inland waterway network 2010**, hamper an optimal use of the waterways' potential and ask for an urgent solution.

Although almost 50% of all goods and passenger traffic are carried on the TEN, it is clear that “motorways” do not serve everyone. **Small waterways** feed the bigger network. Therefore, it is important that Member States do not neglect, but upgrade those waterways relevant for industry under 1350 tons. Cross-border projects must receive careful consideration under the structural funds.

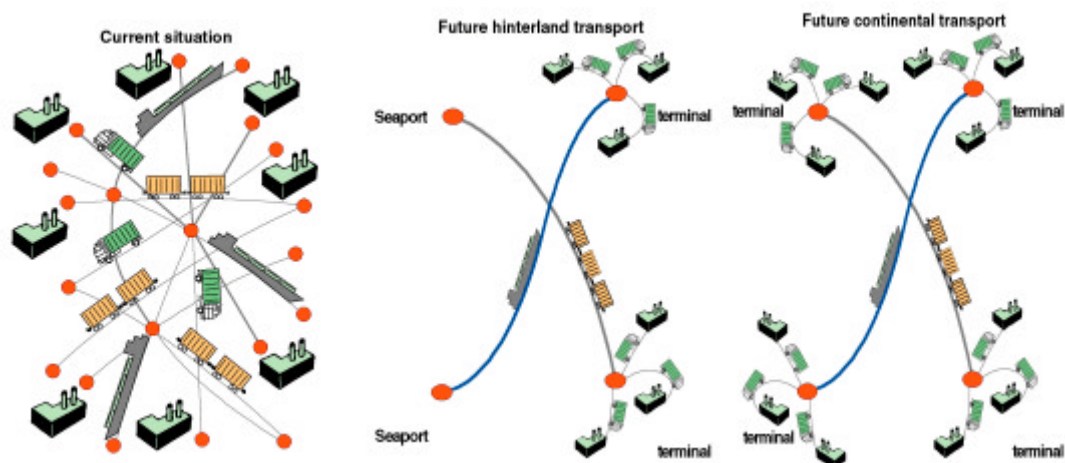
1.2. Intelligent waterways

The Commission rightly underlines the necessity of optimizing the capacity of existing infrastructure and improving safety. Achieving maximum technical interoperability between systems for traffic management and information services are high on the agenda. In this respect, it is highly surprising that the Commission does not mention a deployment plan for the “**River Information Service (RIS)**” in its proposal amending the TEN-guidelines. The Pan-European Minister Conference included the set-up of RIS by 2005 as a main objective and action for the EU in cooperation with UN/ECE and the two river commissions in the Rotterdam declaration of 6 September 2001.

1.3. Access to waterway infrastructure

INE attaches great importance to the Commission’s plans to launch a program for establishing “**waterway branches**” in order to improve significantly industry’s access to waterways. The Commission rightly underpins inland navigation’s complementarity to sea transport. But, continental industrial transport is an even greater growth market. In this respect, the creation and optimization of transshipment platforms along the waterway network will benefit without any doubt the success of logistics partnerships and lead to a more coherent regional planning, since the complementarity of modes can be fully exploited for a more efficient distribution of freight flows. INE will put forward a proposal to the Commission outlining the priorities for turning this program into a success.

“New chances for inland shipping bundling maritime and continental freight flows”



Within the TEN-framework, INE supports the Commission’s proposal to enhance rail access to ports. This is an essential condition for linking both short-sea and inland shipping to multimodal corridors in order to relieve congested areas. This proposal along with optimizing the stretch Straubing-Vilshofen is a positive first step, but it is not an example of an integrated approach and it will absolutely not do to support inland shipping in practice as laid down in the conclusions of the Gothenburg summit.

1.4. Financing of infrastructure

The realization of the above-mentioned projects demands some financial efforts, but it is the logical consequence of a policy opting for sustainable mobility. Some infrastructure is more suited for public private partnerships than others, e.g. motorways, port and transshipment infrastructure and superstructure. This creates additional budget space for investments in infrastructure that is by nature “public good” and multi-functional such as waterways.

Member States must finally take up their responsibility if inland navigation is to become a competitive alternative to road transport. The budget for waterways in the total transport portfolio has been minimal in comparison with its actual share on major routes. **Missing links and bottlenecks must be resolved.** They are fully in line with the Commission’s criteria for selection: feasibility, white paper objectives and Community dimension. The Commission should therefore show more ambition when pointing out the needs for waterway infrastructure.

It is important to consider the **socioeconomic win-back effect**, since finally full use will be made by the liberalized sector of the available capacity. Relieving congestion, optimizing safety and fostering environmentally sound mobility is an investment in Europe’s future. As funds are scarce, INE strongly advocates that in general any funding of TEN projects is linked to its real value and expected return with regard to a modal shift. In the case of waterways, investment covers even more public needs than mere transport needs because of multi-functionality.

INE fully supports the introduction of a **declaration of European interest**. Only, it should be already introduced in this revision directly linked to the increase of the Community aid ceiling to **20%** for European cross-border projects. In line with the subsidiarity principle, only European strategic, and not national projects should come into consideration for more EU co-financing.

2. **Enhancing a modal shift and intermodal integration**

Adequate policy instruments aim at generating cargo flows on environmentally friendly modes and influencing positively mobility.

2.1. New Marco Polo program and State aid

Marco Polo will be a useful tool to shift cargo to environmentally friendly modes. The general principles of the program are welcomed, since it creates an appropriate framework to lowering thresholds for shippers entering the intermodal market. The European Commission should self-evidently ensure transparency for the support given and lay down strict criteria to avoid distortion of competition between non-road transport services. INE cannot accept that a priori one particular mode is favored. The allocation of funds should be fair and focus on projects, which have a maximal return on investment in terms of a modal shift. The **final effect must correspond with the spent means**. As for inland shipping, projects stimulating the following are important:

- Set-up of inland waterway hub & spokes systems
- Value-added services related to waterway transport
- Activities including accession countries
- Technical innovation and ICT to raise performance of transport services
- Promotion of inland shipping in the intermodal chain
- European training programs for freight forwarders and logistics service providers

INE welcomes the flexible approach of the new program taking into account market practice. The link to state aid will limit bureaucracy, but a sufficient grade of transparency must be maintained. In this respect, a EU framework for “national” Marco Polo projects would avoid distortion of competition. INE also expects the European Commission to show a positive evaluation of national aid measures, which aim at reaching the same goals for a modal shift.

2.2. Harmonization at ship level

INE backs the idea of harmonizing boatmasters' certificates and technical prescriptions. It also supports the harmonization of conditions regarding crew composition, navigation time and rest periods. These measures will indeed enhance non-stop navigation. The signing of the CMNI Convention and positive initiatives as the CRDNI are welcomed.

At ship level, a problem remains. Today, inland vessels receive identification numbers from authorities, ports, providers, waterway managers that are different within a country and between countries. These ad hoc identifications correspond with a client number and obstruct statistics gathering, safety checks, implementation of information services, etc. The implementation at European level of **one single identification number** related to a vessel is a simple measure but would without any doubt facilitate easy and uniform recognition of a vessel throughout Europe by all involved parties. INE therefore suggests taking an initiative regarding one single vessel number in Europe.

2.3. Overcoming fragmented administration and remaining hindrances

Harmonization at ship level is however not sufficient to overcome fragmented administration and unnecessary red tape which is a hindrance to the further development of inland navigation. Different administrative rules and other restrictions in the Member States make inland shipping often unattractive to shippers, since they increase costs and hamper a seamless flow in the supply chain. Moreover, they negatively influence mobility. Some examples from certain Member States:

- o Some waterways are closed for navigation during the weekend (no 24h/365d navigation)
- o Inland navigation is subject to some rigid customs regulations in comparison to land modes
- o Different treatment of inland shipping in some seaports in comparison to other modes

INE proposes to establish an **inventory of all barriers** for inland navigation in the different Member States and to work out pragmatic solutions with all interested parties, to enhance best practices, to simplify procedures and to prepare harmonization where necessary in the medium term.

2.4. Modernizing the fleet: a ship for each commodity

Community measures scrapping overcapacity and opening up the inland waterway market did not renew the fleet. National aid measures contributed in some cases in building and buying new cargo-adapted barges. But today, there are still rules in force that discourage investment in innovation and modernization (e.g. penalties in "old for new"). Most of the European fleet is owned by SMEs. Hence, investing in new vessels is not without risk and attracting logistics partners is difficult when investment restrictions remain in force. National aid measures encourage a modal shift to achieve the target of a sound mobility policy. Special **kick-off measures** supporting logistics partnerships to allow growth and diversity on the inland navigation market should be further enhanced.

The above-mentioned items are key conditions to developing inland navigation as a full partner in the logistics chain. Standardization of loading units is not considered as a priority, as inland shipping has no standards or specific waterway containers. Market forces react flexibly to commercial standards. Success is determined by frequency, flexibility and tailor-made solutions. Therefore, INE favors a demand driven approach corresponding to the goods as suggested under 2.4.

3. **Strengthening environmental and safety performance**

Decision-makers are well aware of the intrinsic benefits of inland navigation. Compared to other modes, the environmental impact of waterborne transport is negligible in terms of pollution, noise, accidents, congestion and climate effects. The sector wants to maintain the way of progress, because improvement is necessary and possible. On the other hand, transport users should be encouraged to making use of "green transport". Inland navigation wants to establish an open dialogue with the European Commission and the Member States on pro-active measures in this field to achieve targets.

- 3.1. Towards transport operators : set-up of **support program for clean engines** and granting a green label to clean vessels regarding emissions.
- 3.2. Towards transport users : by analogy with norms in the energy sector to force back harmful emissions, laying down **norms for "green transport"** and granting a green label to business using clean transportation modes. In order to ensure the freedom of transport choice, this program should cover all modes including trucks equipped with clean engines.

4. **Raising awareness about the new image of inland shipping**

Inland shipping is still confronted with an image problem. Decision-makers and transport users are simply not aware of the new possibilities offered by inland navigation. The days that inland vessels were only suited for carriage of heavy low-cost commodities over long distances definitively belong to the past. Apart from traditional bulk cargo, inland shipping transports high value and high-tech products such as cars, televisions, computers, sports wear etc. Goods are stored on board and delivered just-in-time at cost-efficient rates. It is important to highlight the strengths of transport by waterway to increase its use.

4.1. European information & promotion campaign: INE will launch shortly a strategy plan for a European information & promotion campaign addressing decision-makers, transport users and operators. INE favors a **pragmatic, result-oriented approach** aiming at shifting more traffic to the waterways. The international dimension of inland shipping requires a European approach. Given these cross-border activities, inland navigation counts upon the support of the EU. Moreover, promotion of environmentally friendly modes contributes to the overall goal of sustainable mobility.

4.2. Education and training: There is on the one hand the modernization of the profession regarding intermodal needs and possibilities, and on the other a lacuna in the training of forwarders and transport related professions with regard to environmentally friendly transport alternatives. As for the latter, INE offers its full cooperation to creating a **European training module** and making young professionals acquainted with all possibilities of multimodal transport. This will successfully contribute to a new group of **"freight integrators"** acting in the intermodal market.

5. **Enforcing cooperation and integration at European level and towards Eastern Europe**

In view of the enlargement process, the importance of developing sustainable mobility cannot be overlooked. The accession countries have important waterways such as the Elbe, Odra and Danube, but without forming part of a coherent and integrated network the **added value of these east-west corridors** cannot be exploited. Moreover, these waterways face similar problems in terms of infrastructure bottlenecks, services, administrative restrictions and ICT as in the EU. Considering their potential for safe and environmentally sound cross-border trade, efforts must be coordinated to take appropriate actions.

Conclusion

INE proposes a comprehensive package of concrete measures for inland shipping. This is the political setting for infrastructure, goods and ship that decision-makers have to develop to enable transport operators and users shifting cargo in a realistic way. Market initiatives can only be successful if policy-makers create a coordinated framework and implement supportive measures. INE's set of proposals combines financial efforts on the one hand, and positive measures that require only coordination and implementation on the other. As for the financial efforts, they are proportionate with regard to investments in other modes and correspond decisively with the final goal of a transport policy for Europe's citizens. It is indeed time to decide.

INE looks forward to a constructive dialogue with the European Institutions and is committed to actively contribute to a sustainable society.

26 October 2001

Inland Navigation Europe – INE was created in 2000 by national promotion agencies with the support of the European Commission. INE aims at increasing the use of inland shipping in Europe by

- **highlighting the opportunities offered by inland shipping**
- **developing a common strategy for the promotion of inland waterway transport**
- **advocating the necessary political measures**

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