

DANTE - Improving Administrative Procedures and Processes for Danube IWT



Series of National Working Table
Meeting

Output 4.1

1.0

Date: 28/06/2018

Final Version



Document History

Version	Date	Authorised
0.1 draft	01.06.2018	ARVD
0.2 draft	12.06.2018	ARVD
0.3 draft	19.06.2018	ARVD
0.4 draft	25.06.2018	ARVD
1.0 final	28.06.2018	ARVD

Contributing Authors

Name	Organisation	Email
Miroslava Tegelhoffova	ARVD	miroslava.tegelhoffova@arvd.gov.sk

Contributing Organisations

Pro Danube International
Waterborne Transport Development Agency
Slovak Shipping and Ports JSC
Hungarian Shipping Federation
Hungarian Federation of Inland Waterway Freight Forwarders
Hungarian Federation of Passenger Fleet Operators
Bulgarian-Romanian Chamber of Commerce and Industry
Ministry of Transport of Romania
Romanian River Ship Owners and Port Operators Association
Pro Danube Romania
Constanta Port Business Association
Public Institution Port Authority Vukovar
Shipmasters Association of Serbia

Table of Contents

Contents

1	Table of Figures	3
2	Introduction.....	4
3	Consolidated summary of inputs.....	5
3.1	Bulgaria	7
3.2	Croatia.....	8
3.3	Hungary	9
3.4	Romania	10
3.5	Serbia.....	11
3.6	Slovakia.....	12
4	Highlights of the most mentioned cases per thematic area	13
4.1	Border Police, Tax & Customs	14
4.1.1	Observation.....	14
4.1.2	Proposals	14
4.2	Navigation / traffic control authorities.....	16
4.2.1	Observation.....	16
4.2.2	Proposals	16
4.3	Port authorities / administrations	18
4.3.1	Observation.....	18
4.3.2	Proposals	18
4.4	Waterway and Canal administrations	20
4.4.1	Observation.....	20
4.4.2	Proposals	20
4.5	Other relevant authorities imposing barriers.....	22
4.5.1	Observation.....	22
4.5.2	Proposals	22

1 Table of Figures

Fig. 1 Number of raised issue per thematic area - Bulgaria.....	7
Fig. 2 Number of raised issue per thematic area – Croatia	8
Fig. 3 Number of raised issue per thematic area - Hungary	9
Fig. 4 Number of raised issue per thematic area – Romania	10
Fig. 5 Number of raised issue per thematic area - Serbia	11
Fig. 6 Number of raised issue per thematic area - Slovakia.....	12
Fig. 7 Number of issued raised – overall.....	13
Fig. 8 Number of issued raised per thematic area	13
Fig. 9 Number of issued raised in 1 st thematic area: Border Policy, Tax & Customs	15
Fig. 10 Number of issued raised in 2 nd thematic area: Navigation/Traffic control	17
Fig. 11 Number of issued raised in 3 rd thematic area: Port authorities/administrations	19
Fig. 12 Number of issued raised in 4 th thematic area: Waterway and Canal administration.....	21
Fig. 13 Number of issued raised in 5 th thematic area: Other relevant authorities imposing barriers	22



2 Introduction

The organization and the roll-out of the national working table meetings was a key activity of the DANTE project that has served different purposes:

- creating a durable environment for the public and private stakeholders to identify administrative barriers for the inland waterway transport;
- establishment of a cooperative working atmosphere where the barriers can be mitigated in a mutually beneficial way.

The organization of the meetings was managed by the national partners:

- 2-3 meetings based on the national needs in a coordinated way,
- sharing the organizational workload between partners, where there are more partners from one country.

The meetings were organized around the five thematic areas identified for DANTE. In some countries more areas are managed by the same authority and / or some areas are not applicable, therefore is the foreseen number of national meetings planned for 2 or 3.

In each country all 5 thematic areas were discussed at the meetings with stakeholders, waterway users, transport authorities, ports, policies, etc. ASPs were also invited to the national working table meetings.

The five thematic areas are:

1. Border Policy, Tax & Customs,
2. Navigation/traffic control authorities,
3. Port authorities/administration,
4. Waterway and Canal administration
5. Other relevant authorities imposing barriers

During the preparation of the proposal it was agreed that the national working table meetings will be organized between February 2017 and July 2017, whereas the time slot for the follow-up meetings was defined for December 2017 - March 2018. At the second round of the meetings, the draft national arrangement documents including the required changes and improvements shall be discussed.

One partner from each country organized the national working table meetings and elaborated the national output documents, whereas the templates for the meetings (agenda & invitation, presentation, output document) was provided by ARVD in line with the project communication measures from WP2.

National working table meetings (NWTM) have been organised in the following countries:

- Bulgaria (2),
- Croatia (2),
- Hungary (3),
- Romania (4),
- Serbia (1),
- Slovakia (2)

This output document summarises the findings and proposals coming from the national meetings and defines the next steps for the utilisation of these outcomes for the further work in the DANTE project.

3 Consolidated summary of inputs

The most important critical issues in the NWTMs were related to fees and taxes, different interpretations of customs procedures depending on the port / ports where the ships operate and / or the countries where / from where the goods are transported.

The first thematic area (The Border Control, fees & taxes) was the most mentioned at the meetings with 59 issues. Also the second thematic area (Navigation/traffic control authorities) was mentioned in most meetings with 33 issues. Main issues were about double tariffs applied for the same service, time for border control is very long, too many documents, no overall use of RIS, not possible to send documents electronically.

Using the planned works and efforts and the series of the national working table meetings, WP4 will result in the guidelines and recommendations for the improvement of the Danube IWT regulatory framework that is the important input for the WP5 activities. This innovative approach shall lead to an efficient mapping of the cases and a cooperative method to mitigate barriers. The inputs received from the stakeholders during the NWTMs (listed by country in the following subchapters) – together with the other sources (the barrier reporting database and the desk research) will serve as the basis for the elaboration of the **Guidelines and recommendations for improved processes** and the **Danube IWT Administration Strategy & the related action plan**.

Work package 4 – Analysis of procedures will provide an overview of the existing procedural and administrative framework conditions for inland waterway transport on a national basis by using the expertise of the IWT users (represented by the project partner branch organizations) and organization of national working table meetings along the five key thematic areas. 4.1 and 4.2 results will be consolidated in 4.3 into national reports and an overall report. Using the list of required changes and good practices, in 4.4 the DANTE consortium will elaborate on guidelines and recommendations for the respective stakeholders to improve the procedures and processes.



The series of national working table meetings (implemented in two steps) serves as output that shall create a coordinated framework to discuss the existing administrative barriers for the Danube IWT in a manner that results in measures mitigating the barriers to reduce bureaucratic processes, thus reducing time losses and costs for stakeholders. The efficient meetings paved the way to achieve the "Same River-Same Rules" concept on the transnational level as much as possible.

WP4 is the work package that has intense interaction with the internal and external stakeholders and the target groups as well. Authorities - based on their areas of competence - were invited to the national working table meetings and are permanently consulted all along the project as the responsible for law definition and law enforcement. Being the key target groups of DANTE, the authorities and the international organizations (e.g. the river commissions) will receive the draft Guidelines and Recommendations for improved processes for their feedback and inputs, and the final version of the document to further utilize during their procedures.

The consultation with the EUSDR PA1a is also permanent with a two-way approach. DANTE delivers and shares the results of the project with the Priority Area coordinators (PAC) on one hand, and on the other hand the DANTE platform offers its continuous support to the PAC in organizing the WG6-related meetings and providing inputs to the agenda and the discussions. The first set of support tasks was rolled out by means of information exchange along the identified thematic areas.

This iterative process in with the national stakeholders and target groups and the EUSDR PA1a shall ensure that:

- the national working tables shall be kept active after the DANTE project as well, as a stable, durable platform for authority - industry consultations and
- the outputs shall be further used in the sector and updated by the stakeholders e.g. in the framework of the EUSDR and the national levels.

The results will be directly provided to the national authorities, whereas the DANTE platform already provides a full coverage of the Danube by involving partners from all Danube-riparian countries and the Danube Commission itself. A further direct transfer of the results is foreseen towards the Sava River by means of the cooperation with ISRBC.

The series of the national working table meetings can be applicable in other organizations / regions / countries in case that the stakeholders define the proper target groups and the key thematic areas. These are the two main elements that shall ensure the proper representation of the public and private stakeholders in the discussions and the elaboration of the documents.

The "Guidelines and recommendations for improved processes" document will be shared with the stakeholders on the DTP and the EUSDR PA1a website, thus - after consulting the DANTE platform on the details and the workflow - the methodology and the example can be transferred to outside of the DANTE Partnership, such as with the good example of the "Practical manual on border controls along the Danube and its navigable tributaries".

3.1 Bulgaria

- Organized 2 national working table meetings
- 29th of May 2017, Dunav Plaza hotel, Ruse- 35 participants
- 19th of April 2018, Riga hotel, Ruse – 35 participants

**Number of raised issue per thematic area
Bulgaria**

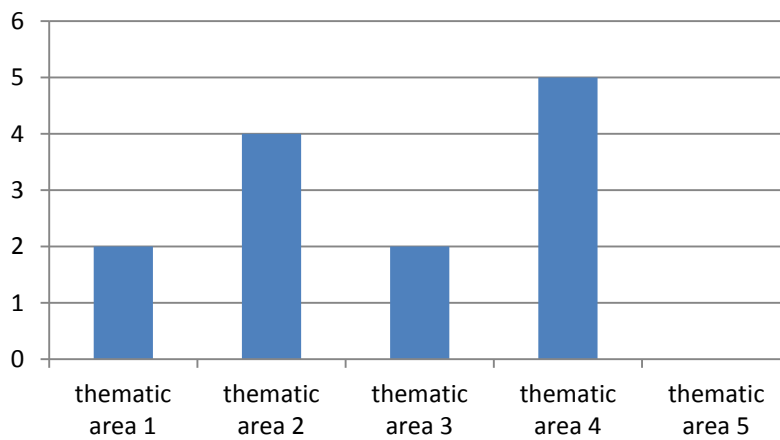


Fig. 1 Number of raised issue per thematic area-Bulgaria



3.2 Croatia

- Organized 2 national working table meetings
- 20th of June 2017, hotel Lov, Vukovar - 23 participants
 - The Border Police, Tax & Customs
 - Navigation / traffic control authorities
 - Port authorities / administrations
- 10th of May 2018, Seosko gospodarstvo Ivica y Marica, Karanac - 27 participants

**Number of raised issue per thematic area
Croatia**

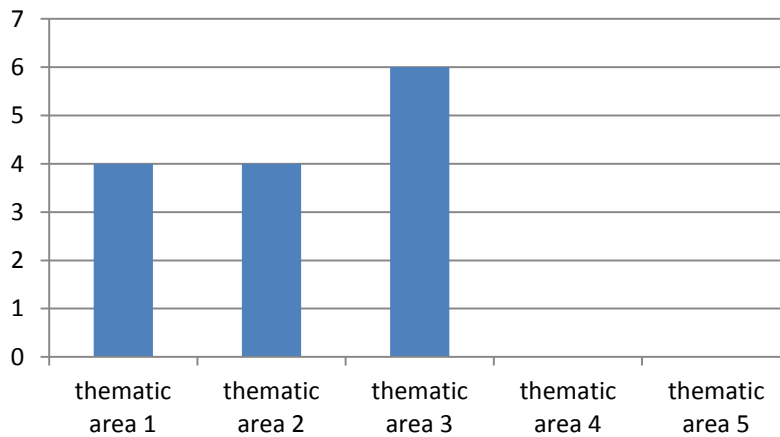


Fig. 2 Number of raised issue per thematic area–Croatia



3.3 Hungary

- Organized 3 national working table meetings
- 12th of July 2017, Budapest - 19 participants
- 18th of January 2018, Budapest – 184 participants
- 18th of April 2018, Budapest – 22 participants

**Number of raised issue per thematic area
Hungary**

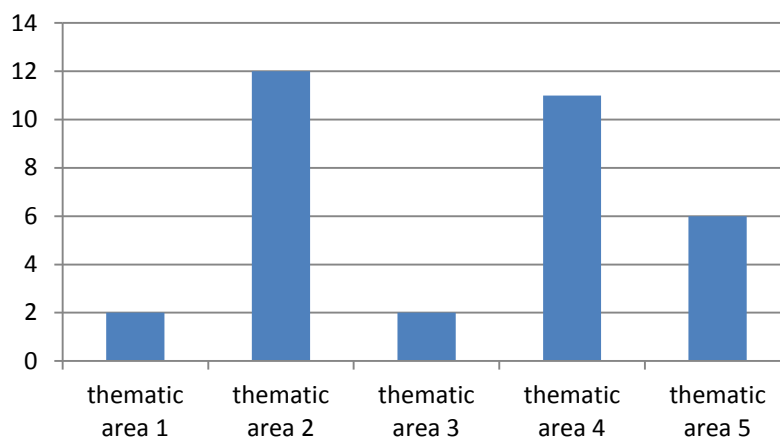


Fig. 3 Number of raised issue per thematic area-Hungary



3.4 Romania

- Organized 4 national working table meetings
- 25th of May 2017, Mercur hotel, Galati – 34 participants
- 13th of June 2017, Ministry of Transport, Bucharest - 28 participants
- 27th of February 2018, Mercur hotel, Galati – 29 participants
- 03rd of April 2018, Ministry of Transport, Bucharest - 34 participants

**Number of raised issue per thematic area
Romania**

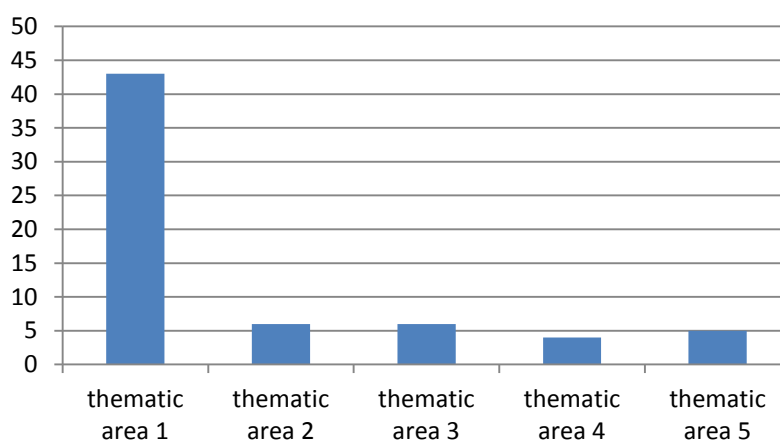


Fig. 4 Number of raised issue per thematic area–Romania



3.5 Serbia

- Organized 1 national working table meeting, 2 days
- 20th and 21st of June 2017, Kladovo - 24 participants
 - Border Police, Tax & Customs
 - Navigation / traffic control authorities

**Number of raised issue per thematic area
Serbia**

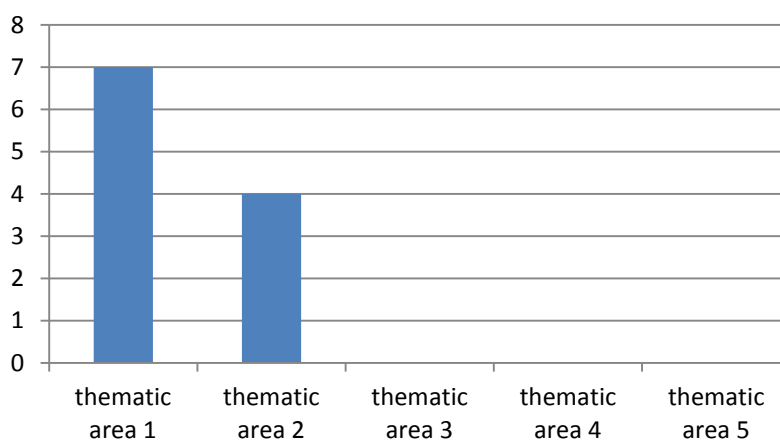


Fig. 5 Number of raised issue per thematic area-Serbia



3.6 Slovakia

- Organized 2 national working table meetings
- 12th July 2017, hotel Falkensteiner, Bratislava - 20 participants
 - Navigation / traffic control authorities
 - Port authorities / administrations
- 5th of March 2018, hotel Radisson Blu Carlton, Bratislava – 18 participants

**Number of raised issue per thematic area
Slovakia**

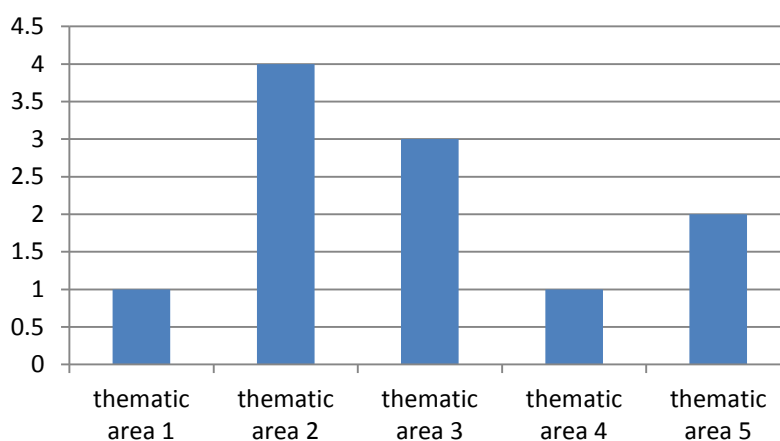


Fig. 6 Number of raised issue per thematic area - Slovakia



4 Highlights of the most mentioned cases per thematic area

The following figures and chapters illustrate the findings of the national working tables meetings on the overall level.

Number of issues raised - overall

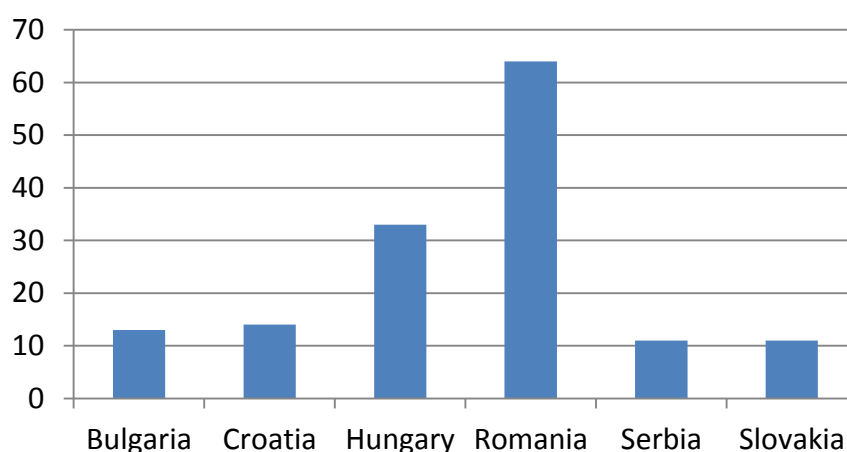


Fig. 7 Number of issued raised – overall

Number of issues raised per thematic area

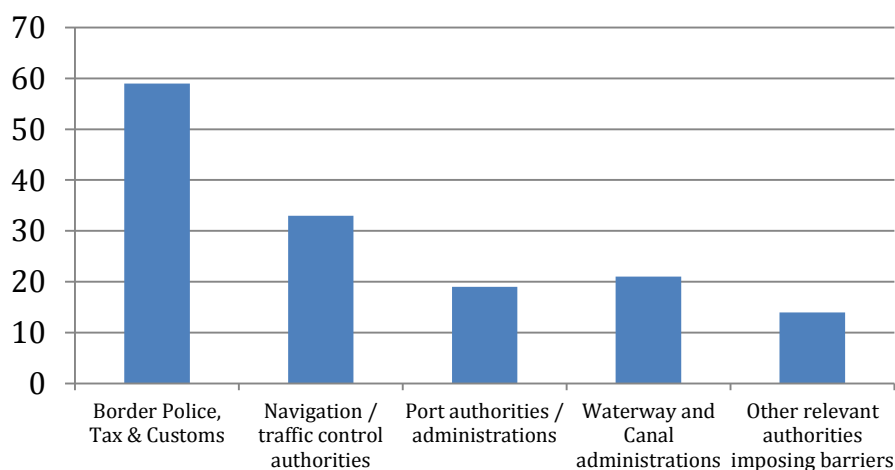


Fig. 8 Number of issued raised per thematic area

4.1 Border Police, Tax & Customs

4.1.1 Observation

- Competencies and office hours of the relevant competent authorities are not transparent enough for the stakeholders of the IWT sector
- Unknown zero draught of the vessels, actually lack of proper information about it, lack of general plan of the vessel construction
- Unwarranted and high fees/tariffs
- Personnel is not qualified enough in the naval field
- Not enough personnel
- Time for border control conduction and implementation is very long
- The problem of not obeying the restriction for navigation in case of low water – because of legal fine are too small
- Double / triple tariffs applied for the same service
- Very high tariffs for mooring the ship to the quay, without performing loading / unloading operations.
- The Customs procedures are applied differently in various ports located on the Danube.
- Different interpretations of Customs procedures depending on the port / ports where the ships operate and / or the countries where / from where the goods are transported.

4.1.2 Proposals

- The problems identified and reported by shipowners, agents and port operators should be brought to the attention of the authorities as soon as possible and solved punctually, first of all through meetings and direct discussions with all authorities, port administrations and waterway administrations, etc.
- If necessary, it should be initiated also the modification of laws / legal documents, etc. that regulate the activity of inland waterway transport in each country.
- Shipowners, agents and port operators are interested for a permanent cooperation with authorities and administrations with competencies in naval transport activities and to find common solutions in order to improve the procedures and administrative processes applied. These procedures are not intended to be eliminated, but they are intended to be implemented in a way that reduces the costs and the transport time for shipowners, agents and operators and removes the administrative barriers which do not allow the development of these activities.
- The central authorities and the local administrations should be forced to act, to be asked punctually and very clearly to solve the identified problems.
- The tariffs applied by the authorities / administrations must be negotiated with the private transport operators. They shouldn't be imposed.

- Very high tariffs for mooring the ship to the quay, without performing loading / unloading operations. Ships should not pay these rates unless they do business. Ship's quay should be free of charge.
- Different tariffs applied to different ship categories: propelled vessels, unpropelled ships, etc. for the same occupied space at the quay. Differential tariff application for the same service, both qualitatively and quantitatively, it's not correct.
- Charges and fees are paid, but no proper services are offered.
- The tariffs applied by the authorities / administrations must be related to the goods transported. If the ships do not carry goods, they should not pay any taxes or fees.
- The tariffs paid by the economic agents are very high and services provided by counterparties need to be greatly improved to meet the level expected by the shipowners/ agents / port operators.
- To apply common methodologies to the level of authorities / administrations to determine how to develop the tariffs they apply to those involved in shipping activity

Border Policy, Tax & Customs

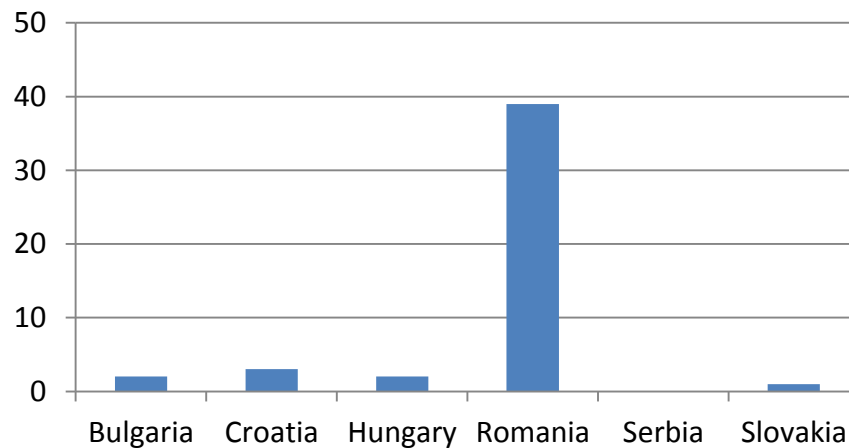


Fig. 9 Number of issues raised in 1st thematic area: Border Policy, Tax & Customs

4.2 Navigation / traffic control authorities

4.2.1 Observation

- Too many documents with high share of overlapping information are used all over the Danube-riparian countries & on the whole Danube-aspect
- No overall use of RIS
- It is not everywhere possible to send documents electronically
- Competencies and office hours of the relevant competent authorities are not transparent enough for the stakeholders of the IWT sector
- Vessel inspections and other controls & checks are not conducted in parallel which increases time losses

4.2.2 Proposals

- Competencies and availability of the respective control authorities shall be made transparent to the sector and updated accordingly
- The way and deadline of (pre-)submission of vessel documents shall be harmonized
- Vessel inspections and other controls & checks shall be conducted in parallel to reduce time losses
- A single database would be welcome on vessel inspections rolled out in Danube countries in order to avoid several checks within a few days
- Use the data from RIS (river information services) in the proper way in order to retrieve vessel data to prepare / roll out inspections (and substitute the T2L document)
- There is need for a comprehensive analysis of the sub-legislation acts dealing with navigation and dividing them for sea and river
- Only through communication and through a direct dialogue all the parties involved can solve the administrative aspects and obstacles raised by the stakeholders
- The utilization of agents shall be harmonized
 - Different requirements along a Danube voyage
 - The role of agents is not always clear

Navigation/traffic control authorities

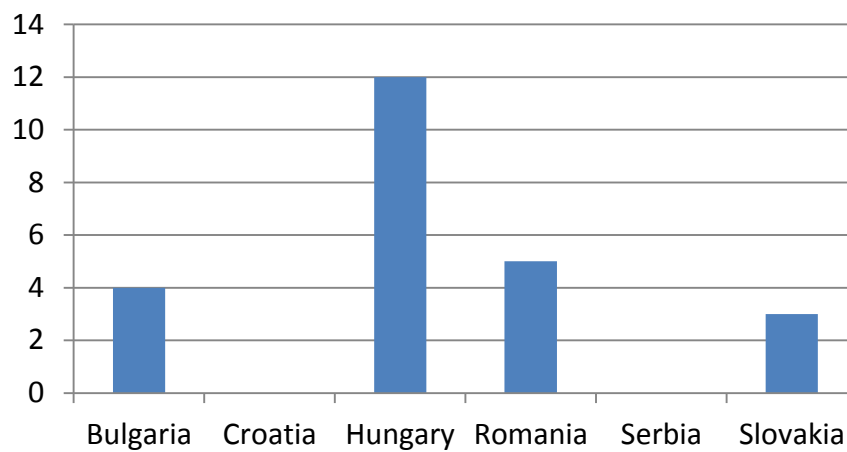


Fig. 10 Number of issued raised in 2nd thematic area: Navigation/Traffic control



4.3 Port authorities / administrations

4.3.1 Observation

- The port authorities need to modernize existing infrastructures
- Drink water bunkering possibility
- Garbage stations with recycling
- Shore Power connections
- The transit and the local cargo traffic need more free safe docking places for overnight stays or for a high water situation
- Harmonized rapport protocol for all port Danube wide
- The usage of the Simple Window system is frustration and cause too much time because there is too much work to be done in order to collect the information and input the data of the ships where they have to face many regulations
- There are data errors entered into the RORIS 2 system, which lead to many problems to the personnel of the authorities that manage this system, and therefore preventing the occurrence of unwanted events is a pro-active
- The internal roads in the port areas belong to the port operators and they have the obligation to keep them in good condition. Port authorities have no way to allocate financial resources to maintain in proper conditions the fixed assets that do not belong to them.
- Most problems are related to obtaining the environmental agreements. If these agreements are not obtained, the funds may be declared ineligible and must be covered from own sources
- In some port more berths are missing from which ships can be supplied with water, for example in Port Galati

4.3.2 Proposals

- Designed one universal user-friendly mobile or/and pc application for the harbour rapports, as well as an all in one data structure management subsystem for all static dynamic dates (RIS)
- Free internet WIFI system for the application users
- Install more lightweight construction (for example dolphin structure) free docking places
- Digitalization and facilitation of the administrative procedures
- Access to the quays and port infrastructure must be free for all ships, and the cost of maintaining the port infrastructure must be recovered from the use of quay assets rather than its proper use.

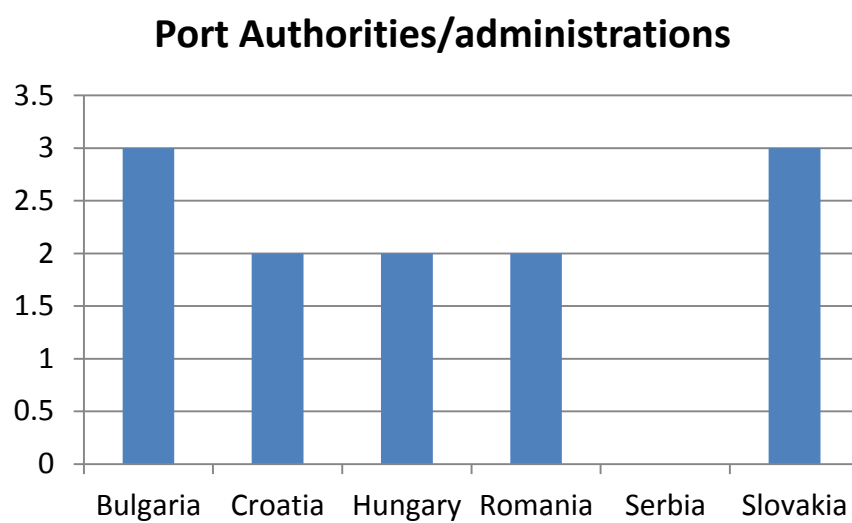


Fig. 11 Number of issued raised in 3rd thematic area: Port authorities/administrations

4.4 Waterway and Canal administrations

4.4.1 Observation

- The most serious problem is the abandoned vessels on the fairway
- The permanent lack of depth reports
- The waste oil cannot be disposed in all ports
- During the winter, the ice has not been cleaned in time, the ships were stuck
- The tariffs applied by the port and waterway administrations are approved by their Board of Directors, which are formed by people who are not experienced and competent in this field of activity and do not know what are the problems facing the ship owners, agents and port operators in carrying out inland waterway transport activities.
- The navigation problems in some area can only be solved by building a lock. Another technical solution is not viable and will not solve major navigation problems in this area, especially in periods of low waters. Dredging operations will not solve this problem. Hydraulic works are required to achieve a viable and permanent solution.

4.4.2 Proposals

- Strict rules for Waterway and Canal administrators regarding the abandoned vessels on the fairway
- Depth reports shall be delivered on time, on a regular basis
- Waterway and Canal administrators should find affordable and efficient solutions to reduce time losses because of the ice during winters
- If necessary, it should be initiated the modification of laws that regulate the activity of inland waterway transport

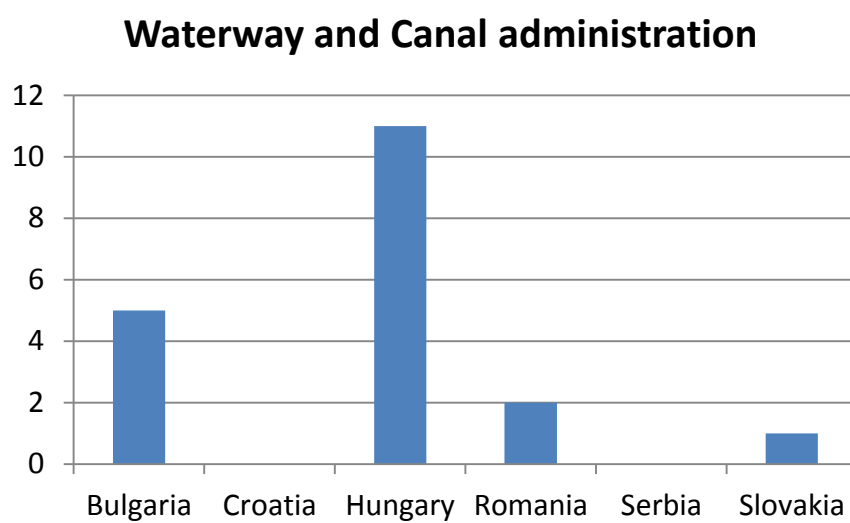


Fig. 12 Number of issues raised in 4th thematic area: Waterway and Canal administration



4.5 Other relevant authorities imposing barriers

4.5.1 Observation

- There are no parking lots for the cruise ships operation
- Is it necessary to call the police even in case of natural death? Is enough to call only the ambulance because police will stop any embarkation and disembarkation of the passengers for hour?
- In Romania the work permit is required in Constanta port only to the shipowners who have contracts with Constanta port. Other foreign shipowners, who are represented by agents, are not required to do so.

4.5.2 Proposals

- It is necessary to discuss with competitive authorities
- It is necessary to change legislative so that passengers are not hostages
- The implementation of the *acquis communautaire* in national legislation is very important and it actually generates how the provisions of the EU Directives apply in each country, depending on the specific conditions existing.

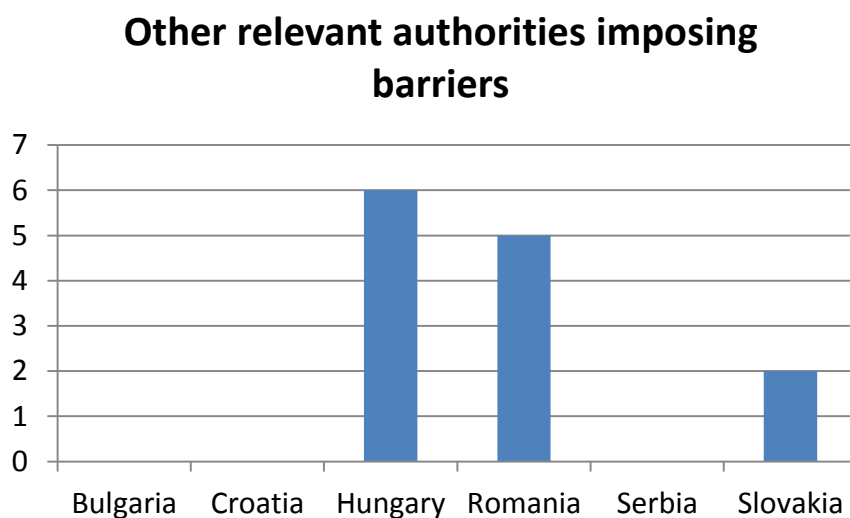


Fig. 13 Number of issues raised in 5th thematic area: Other relevant authorities imposing barriers