

## **OUR POSITION on the Draft Land and Multimodal Transport Guidelines (LMTG) and draft Transport Block Exemption Regulation (TBER)**

Considering the uptake challenges of technological advancements and the high long-term investment needs in the Inland Waterway Transport (IWT) sector, **Pro Danube International** welcomes the initiative of the Commission with regard to the **Draft Land and Multimodal Transport Guidelines (LMTG) and the Draft Transport Block Exemption Regulation (TBER)** which are promoting a sustainable EU transport policy in line with the goals of the European Green Deal and of the Sustainable and Smart Mobility Strategy. The expanded scope of the draft LMTG, which integrates inland waterways and multimodal transport is highly appreciated.

As part of our ongoing efforts to promote well-designed public support measures for IWT, particularly in fostering investments in the Danube fleet, we are actively participating in this consultation. The [Model State Aid Scheme](#) developed under the coordination of **Pro Danube International** in the frame of the **GRENDL Project** (co-funded by European Union Funds – ERDF, IPA) was for a good part of its supporting measures legally based on the General Block Exemption Regulation (Commission Regulation (EU) No 651/2014 of 17 June 2014).

Based on inputs received from our Members, we would like to draw your attention to the following elements related to the specific configuration in the Danube Region:

- **Definitions**

For a better understanding in the IWT sector, we kindly propose to give a more precise definition of “passenger transport” similar as in the case of the rail sector.

- **Aid to reduce the external costs of transport and its incentive effect**

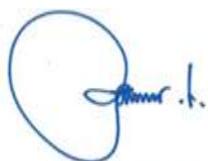
The strength of the Danube IWT sector lies in its ability to support long-distance transport. Therefore, we propose applying fair and equal limitations to both the IWT and rail sector – such as the 800-kilometer limit – to support modal shift and to ensure a uniform treatment of sustainable transport modes.

- **Aid for the acquisition of vehicles for rail or inland waterways transport and its target group**

As this aid can be granted only to SMEs and new entrants, we would like to bring to your attention that Danube navigation is historically characterised by a relatively small number of major fleet operators. As many vessels have reached or passed their commercial and/or technical lifetime, Danube fleet operators will need access to adequate funding and financing opportunities.

We would highly encourage to take into consideration the above elements to stimulate the development of sustainable and smart modes of transport at EU level.

**Pro Danube International** is advocating for a harmonised legal framework which is easy to apply for IWT administrations and users and which is supporting the IWT sector adhering to the **“Same River – Same Rules”** principle.

A handwritten signature in blue ink, appearing to read "Herfried Leitner".

**Herfried LEITNER**  
President and Chairman of the Board

A handwritten signature in blue ink, appearing to read "Róbert Rafael".

**Róbert RAFAEL**  
General Secretary

### About us

**Pro Danube International** represents the voice of Danube-minded businesses which are interested in the promotion of better navigation conditions, waterway infrastructure and transport services, hence being an active contributor in the political debates on transport policy, technology, and regional development fora. For over a decade, **Pro Danube International** has been involved in the initiation and execution of transnational EU-funded projects related to the development of the inland waterway transport sector in the Danube Region.

### Members of Pro Danube International

