



Council of the European Union  
General Secretariat

---

---

**Interinstitutional files:  
2024/0011 (COD)**

---

---

**Brussels, 27 March 2024**

**WK 4725/2024 INIT**

**LIMITE**

**TRANS**

**MAR**

**CODEC**

**IA**

*This is a paper intended for a specific community of recipients. Handling and further distribution are under the sole responsibility of community members.*

## **WORKING DOCUMENT**

---

From:	General Secretariat of the Council
To:	Working Party on Shipping
N° Cion doc.:	ST 6008 2024 INIT + ADD 1-ADD 6
Subject:	DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 2005/44/EC on harmonized river information services (RIS) on inland waterways in the Community. - Comments by Austria

---

Delegations will find attached comments by **Austria** on the above proposal.

Proposal for a  
**DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL  
amending Directive 2005/44/EC on harmonised river information services (RIS) on  
inland waterways in the Community**

**Austrian comments to Doc. ST 6008/24 (COM(2024) 33 final)**

We would like to thank the EC for the initiative and to express our support for the general objectives and goals of the proposal.

But the proposal raises also a lot of questions:

Article 4 par 3 (a)	<b>Clarifications regarding navigation and voyage planning</b> Article 4 par 3 (a): Replace "These data as defined in Annex I" with "The network data as defined in Annex I" and add "in accordance with Annex III" after "an accessible common electronic format".
Article 5 par 1 (j)	Article 5 par 1 (j): Replace "provisions for navigation, and voyage planning" with "data for navigation and voyage planning".
Annex I	Annex I: Replace "current and expected waiting times at bridges, locks and inland ports;" with "average waiting times at bridges, locks and inland ports;" or delete the sentence.
Annex II (9)	Delete "and reflect the real-time situation" in the last sentence. Annex II (9): Replace "The technical specifications for navigation and voyage planning" with "The technical specifications for data for navigation and voyage planning". Add a letter (d): "standardised data format for the network data listed in Annex I."
	<p><i>Explanation:</i></p> <p><i>An important deficiency of the current RIS Directive is the missing legal basis for a technical specification of the format in which the network data listed in Annex I has to be made available. It seems that the proposal does not solve this problem: Annex I refers to Article 4 (3) which requires "all relevant data concerning navigation and voyage planning on inland waterways". According to Annex I this is network data. Article 5 (1) j requires technical specifications for "navigation and voyage planning", but Annex II (9), which refers to "The technical specifications for navigation and voyage planning in accordance with Article 5" is only listing dynamic data and no network data.</i></p> <p><i>It has also to be clarified that the technical specifications will not deal with "provisions for navigation" that would be traffic rules, but with the data for navigation.</i></p> <p><i>The proposal requires to provide waiting times at ports, locks and bridges. There are currently no harmonised definitions for "current waiting times" and "expected waiting times" and there could be very different interpretations of the meaning of e.g the "current waiting time at the port of Rotterdam". There is also no general waiting time at locks. If there is already a vessel in a lock chamber, it depends on the size of the other vessels (or convoys) whether they can be locked together with the first vessel or have to wait for the next locking cycle. In some cases, it is possible to provide a RTA for a specific vessel, but not for every kind of infrastructure. What can be provided are "average waiting times".</i></p> <p><i>"Current waiting times" and the real-time requirement in the last sentence would mean that it is not sufficient to encode a NtS in case of a closed lock or a reduced height of a bridge, but to change additionally the network data.</i></p> <p><i>Another problem with waiting times: a lock or a terminal opens e.g. at 08:00. For a vessel arriving at 06:00 the waiting time is 02:00, but this time would have to be updated every</i></p>

	<p><i>minute.</i></p> <p><i>Information from the terminals in inland ports is often not available or just partly. It is dependent on other (mostly private) organisations.</i></p> <p><i>Last paragraph: "up-to-date" is possible, but "real-time situation" should be deleted.</i></p>
Article 1	<p>Replace "continuity" with "standardised interfaces" in par. 2 and add "and RIS in third countries" at the end.</p> <p><i>Explanation:</i></p> <p><i>The meaning of "continuity with other modal traffic management services" is rather vague and the necessary contribution of those other services is outside of the scope of the RIS Directive. Within the framework of the RIS Directive we can only guarantee standardised interfaces to the other services.</i></p> <p><i>Annex 2 mentions once that data should also be exchanged with third countries. This is a precondition for seamless navigation and voyage planning on the Danube (and even on the Rhine). But the exchange of personal data with third countries, especially with those that are no "safe havens" according to Data Protection Regulations of the EU would need a sound legal basis. Bilateral agreements of the neighbouring countries with the third countries would not be sufficient to allow the exchange of data that has been forwarded to the neighbouring country by another MS. It is therefore important to mention the interfaces to RIS in third countries already in the subject matter.</i></p> <p><i>See also proposal for a new Article 4 par 10.</i></p>
Article 2	<p>Add the following sentence: "For inland waterways and inland ports that are only connected by maritime routes to other inland waterways the Member States can decide whether River Information Services in accordance with this Directive or maritime information services are implemented."</p> <p><i>Explanation:</i></p> <p><i>We do not see a necessity to extend the geographical scope to inland waterways and inland ports that are only connected by sea to other inland waterways. Even if e.g. an Austrian company would like to use those waterways, it would need vessels in conformance with the maritime regulations. If the maritime information systems are available on those inland waterways, the vessels could also use those. With regard to proportionality, it would be justified to allow the Member States to decide whether they implement the Maritime Information Services or the River Information Services on those waterways and in those ports.</i></p> <p><i>With regard to barely frequented or seasonally accessible waterways, a disproportionate burden could be avoided with an exemption clause.</i></p>
Article 3, (he)	<p>Add the following sentence: "It does not include the network data in accordance with Annex I and Annex III provided by the Member States."</p> <p><i>Explanation:</i></p> <p><i>The proposal defines ERDMS as a single point of access repository (library) of reference data and codes lists that are used by IT applications in inland waterway transport. It is not entirely clear whether this definition covers the network data listed in Annex I or only the reference codes mentioned in technical specifications. Experience has shown that the ERDMS operated by the EC is no suitable platform for the maintenance of the more dynamic network data that is a precondition for the functioning of the RIS platform. It should therefore be clarified that the ERDMS is dealing with the reference data and code</i></p>

	<p><i>lists with the exception of network data and that the network data is stored and maintained in the RIS platform.</i></p>
Article 3, (hh)	<p>Replace "RIS Platform" with "European RIS Environment". Replace "serving for electronic reporting" with "providing links to electronic reporting".</p> <p><i>Explanation:</i> <i>We propose a better wording taking into account e.g. the maritime single window environment. "European RIS Environment" could replace the term "RIS platform". The definition of the RIS Platform includes electronic reporting. The EC explained that the platform developed by RIS COMEX (EuRIS) is meant. But electronic reporting is currently done by the CEERIS platform (also developed in RIS COMEX), BICS, NAMIB, VELI and other systems. It should be clarified that users can decide which reporting point they use as long as the 'once-only' principle is fulfilled.</i></p>
Article 3, new (hi) and (hj)	<p>Add definitions for 'CESNI', 'ES-RIS' and 'up-to-date'.</p> <p><i>Explanation:</i> <i>The terms are used in the Directive but are missing in the definitions.</i></p>
Article 4 par 1	<p>Replace with "Member States shall take the necessary measures to implement RIS on inland waterways falling within the scope of this Directive. They shall take the necessary measures to ensure the availability of all River Information Services in inland ports falling within the scope of this Directive either by Port Community Systems or by extending RIS to those ports. The Commission shall ensure the availability of funding for areas that have been outside of the scope of Directive 2005/44."</p> <p><i>Explanation:</i> <i>On one hand this paragraph requires to implement RIS in inland ports, on the other hand it is required to exchange data with Port Community Systems, which means that ports are not seen as an integral part of RIS but as something to be connected. Funding should be ensured, so that the inland ports can join, in particular regarding the RIS relevant data provision (data for all terminals including dynamic data for voyage planning) and RIS can be implemented on additional inland waterways of the TEN-T network.</i></p>
Article 4 par 3 (b)	<p>Replace "inland waterways of the TEN-T" with "inland waterways and inland ports of the TEN-T".</p> <p><i>Explanation:</i> <i>The proposal includes a requirement that inland ports have to provide a lot of RIS related data, but they are excluded from the requirement to provide Inland ENCs. It is nice if a lot of data is made available for a specific terminal in an inland port, but if the vessel enters a black space when it leaves the waterway because there are no charts for the port the skipper does not even see where the terminal is.</i></p>
Article 4 par 3 (c)	<p>Replace with "enable the competent authorities to receive electronic ship reports of all data that is required by national regulations of Member States of the EU or of third countries connected to the inland waterway network of the EU or by international regulations. In cross-border transport, this data shall be transmitted in full to the competent authorities of the neighbouring State and any such transmission shall be completed before arrival of the vessels at the border;"</p>

	<p><i>Explanation:</i> Experience with the current RIS Directive has shown that some MS do not store reported data that is not required by national law due to Data Protection Regulations. Without that reporting only once is not possible. Even if the remaining dataset is forwarded to the neighboring state it does no longer meet the reporting requirements in that State and the skipper has to report again. The RIS Directive has to provide a legal basis for the storing and forwarding of all data that is required by any reporting requirement along the route. See also proposal for a new par 10 in Article 4.</p>
Article 4 par 3 (e)	<p>Replace with "ensure that the network data in the European RIS Environment is kept up to date by supplying all the necessary network data defined in Annex I and Annex III without delay and revise them at least once per year;".</p> <p><i>Explanation:</i> Member States can only provide the national network data, not the reference codes that are maintained by international organizations or defined in ES-RIS.</p>
Article 4 par 3 (f)	<p>Replace "is exchanged between RIS and" with "is made available through interfaces following the technical specifications laid down in accordance with Annex II part 7 in Annex III to"</p> <p><i>Explanation:</i> The term "is exchanged" would imply that the other Union laws also include a requirement to exchange traffic related information with RIS. As this does not seem to be the case, we suggest a rephrasing to stay within the scope of the Directive.</p>
Article 4 par 3 (g)	<p>Delete.</p> <p><i>Explanation:</i> The EC explained in the presentation that the obligation to use eFTI for dangerous goods is already stated in other legal acts. To repeat an existing obligation is superfluous and as eFTI is not part of RIS the requirement is outside of the scope of the Directive. It could be considered to introduce a requirement that the electronic reporting environment of the European RIS Environment can be used as an eFTI platform, but this would not be an obligation of the Member States and would therefore not be part of Article 4 par 3.</p>
Article 4 par 3 (h)	<p>Replace with "ensure that standardised interfaces in accordance with ANNEX II and ANNEX III are made available for the port community systems of inland ports, including, among others, availability of alternative fuel infrastructure, and in particular those installations required pursuant to Article 10 of Regulation (EU) 2023/1804 of the European Parliament and of the Council<sup>40</sup>;".</p> <p><i>Explanation:</i> Port Community Systems are normally commercial systems implemented according to the needs of the individual inland port. It is unclear how a structured information exchange between RIS (the European RIS Environment?) and a multitude of different Port Community Systems can be achieved in such a diverse landscape of systems. A rephrasing to "interfaces are made available" is necessary. There is still no established technical solution for the provision of information on occupation of berths by unmanned pushed barges. A requirement to provide the information on the</p>

	<p>availability of berths would therefore be problematic, at least on waterways where unmanned pushed barges are in use.</p>
Article 4 par 3 (i)	<p>Replace “ensure that information is exchanged between RIS and” with “ensure that standardised interfaces in accordance with Annex II and Annex III are made available to”</p> <p><i>Explanation:</i> It has to be clarified that RIS will just offer a standardised interface for the various inland waterways infrastructure systems. It would not be acceptable that each system comes up with its own requirements for data exchange.</p>
Article 4 par 5	<p>Add “and provide the necessary data” at the end of the first sentence. Replace “authorities responsible for operating RIS Platform” with “authorities responsible for the European RIS Environment”.</p> <p><i>Explanation:</i> A provision is missing, that MS need to provide data according to Annex I, II and III to the RIS Platform. The authorities are not only responsible for operation, but also for the governance of the RIS Platform respectively the European RIS Environment. But they can designate an operator.</p>
Article 4 par 6	<p>To be thoroughly discussed</p> <p><i>Explanation:</i> Paragraph 6 raises many concerns. A joint initiative by Member States and Third Countries has established the current RIS Platform (EuRIS) which is governed by the ECMA (agreement under private law). The Commission cannot simply claim (partial) ownership of EuRIS without joining the ECMA. We have doubts that the RIS Platform is falling under the exclusive jurisdiction of the EU because of the principle of subsidiarity. What would be the consequences for the Member States if the implementing act identifies a new operating entity, which is e.g. much more expensive than the existing one? In addition, the proposal includes an obligation for all MS with TEN-T inland waterways or ports to participate in a common RIS platform. As the Directive does not state that the RIS platform is financed by the EC it has to be assumed that it will have to be financed by the MS (and third countries) in the future, too. The European Corridor Management Agreement (ECMA) defines the distribution of costs and of voting rights. Does that mean that MS who are currently no members of the ECMA are obliged to become ECMA members and to accept the current cost distribution keys and voting right keys? Or does it mean that the current ECMA partners will have to pay for the RIS platform, but the RIS platform has to be open for MS that do not contribute to the costs?</p>
Article 4 par 8	<p>Consider to mention carriage requirements for RIS equipment and obligations for landside AIS infrastructure.</p> <p><i>Explanation:</i> Consideration point 7 stipulates that MS “should be aware of the position of all inland waterway vessels including through the use of automatic identification systems (‘AIS’) data”. To be able to meet this goal the MS need to have a coverage of all TEN-T waterways with AIS base stations and a carriage requirement for AIS.</p>

Article 4 par 9	<p>Add "availability".</p> <p><i>Explanation:</i> <i>Availability of RIS seems to be missing.</i></p>
Article 4 new par 10	<p>Add a new paragraph 10: "The Commission shall conclude contracts with Third Countries that are connected to the TEN-T inland waterway network to provide a legal basis for the exchange of RIS data and to ensure reporting 'once-only'.</p> <p><i>Explanation:</i> <i>Reporting only once is only possible on the Danube and even on the Rhine if the reported data is not only forwarded to a neighbouring MS, but also to a neighbouring Third Country. Bilateral agreements between individual MS and individual Third Countries cannot solve the problem, because MS are also forwarding data that has been reported in other MS.</i></p>
Article 5 par 1 (f)	<p>To be thoroughly discussed.</p> <p><i>Explanation:</i> <i>The "operational characteristics, roles and procedures for the RIS platform" are part of an Implementing Act according to Article 4 par 6. Here it is stated that the technical specifications as referred to in Annex III shall include the "operation of the RIS platform". Annex III is amended by delegated acts. We need a clarification what has to be covered by implementing acts and what can be regulated by delegated acts.</i></p>
Article 5 par 1 (h) and (i)	<p>Replace with "(h) standardised interface for IT platforms of other transport modes, including at least eFTI and EMSWe; (i) standardised interface for port community systems and for smart inland waterway infrastructure systems;"</p> <p><i>Explanation:</i> <i>As the other systems are outside of the scope of the Directive it is not possible to include an obligation for them to exchange data. It is also unclear which data should be sent from RIS to eFTI as eFTI is set up as platforms where entrepreneurs can store their freight documents. The freight documents are not part of RIS.</i></p>
Article 8	<p>Replace one year with a longer period.</p> <p><i>Explanation:</i> <i>A year will be too short to establish e.g. a complaint authority, to hire employees and to become operational. The period will also be too short for MS that have not implemented RIS so far.</i></p>
Article 8a	<p>Revise to allow international complaint bodies that forward complaints to the competent authority and inform the Commission if an authority does not react repeatedly.</p> <p><i>Explanation:</i> <i>An effective complaint mechanism would indeed be a valuable support for the improvement of RIS and the closing of existing gaps in the implementation. There are however serious doubts that a national complaint authority could solve the problem: we are talking about MS who have not managed to fulfill the obligations defined in the RIS</i></p>

	<p><i>Directive from 2005 until today. Why should a new national authority be able to solve such a problem? On the other hand, some countries have already been offering a contact points for complaints for many years and had one or two complaints per year. A cost benefit analyses will never justify the creation of an independent national authority that has to handle one or two cases per year. The EC justified the obligation in its presentation with the possibility to use existing authorities for maritime port services. But these authorities do not exist in landlocked countries.</i></p> <p><i>The COMEX<sup>2</sup> feedback tool could provide this functionality. DG MOVE could participate in the supervising committee.</i></p>
Article 9	<p><i>ITU prohibits the forwarding of received broadcasted data (AIS position reports). Everybody knows that it is not possible for the Member States to stop the operation of a website from a country outside of the EU that is publishing AIS data and that it is not possible to find and shut down the receiving stations in the EU. This Article would introduce an obligation that MS cannot fulfil.</i></p>
Article 10 par 1	<p>Add "and the consequential amendments of Annexes II and III".</p> <p><i>Explanation:</i> <i>If additional elements are introduced in Annex I it will also be necessary to reflect those amendments in Annex II and Annex III. This will normally not be possible at the same time and the Commission should consider the consequential amendments.</i></p>
Article 11 par 2	<p>"paragraph" has to be replaced by "article".</p>
Article 12	<p>Reintroduce a transitional period for MS to ensure that their RIS complies with a new edition of ES-RIS. A period of 24 months is proposed.</p> <p>Introduce deadlines for the inclusion of the new elements in the technical specifications (ES-RIS, Annex III).</p> <p><i>Explanation:</i> <i>The deletion of paragraphs 2 and 3 of Article 12 would mean that the River information Services of the Member States have to comply with the latest edition of ES-RIS (Annex III) immediately after entry into force. This is not realistic. A period of 24 months would be appropriate.</i> <i>Annex III makes ES-RIS 2023 mandatory. But ES-RIS 2023 does not contain all the specifications required by Annex II especially topics (f) – (j). ES-RIS 2025 will also not be in line with Annex II. The Directive should contain deadlines until when the new elements in Annex II have to be reflected in ES-RIS, when they will enter into force and when the services of the Member States will have to comply with them.</i> <i>Provisions from page 8 on the evaluation of the Directive have to be taken into account: "Given that the initiative is reliant on the application of secondary legislation (technical standards), it is important to allow for a sufficient timeframe for the development and introduction of this secondary legislation."</i> <i>DG MOVE should already consider now, how and what to include into the new CESNI/TI work program (2025 – 2027). Otherwise, the new points can only be taken into account for ES-RIS 2031.</i></p>
Article 12a	<p>Replace "5 years after the date of entry into force" with "7 years after the end of the implementation date."</p>

	<p><i>Explanation:</i>  <i>Provisions from page 8 on the evaluation of the Directive have to be taken into account: "Therefore, 7 years after the end of the implementation date of the legislation, the Commission should carry out an evaluation to verify to what extent the objectives of the initiative have been reached."</i></p>
Article 2 of the proposal	<p>Replace one year with a longer period.</p> <p><i>Explanation:</i>  <i>One year will be too short, especially for MS who are currently not using EuRIS. MS might have to amend a law, set up a new authority by this law, hire people for the new authority, ...</i></p>
Annex I	<p>Add information about alternative fuel infrastructure.</p> <p><i>Explanation:</i>  <i>The new minimum data requirements don't fully reflect the new requirements stipulated in the recitals and in Article 4 (e.g. on the provision of information about alternative fuel infrastructure).</i></p>
Annex II (1)	<p><i>There will be no RIS Guidelines anymore. What are the implications of such a major change? One of the proposed policy measures was to provide more detailed guidelines, but removing the RIS Guidelines from the Annexes of the RIS Directive could result in less detailed guidelines, contradicting with the proposed policy measure.</i></p>
Annex II (2) (g)	<p>Delete "electronic navigational chart and".</p> <p><i>Explanation:</i>  <i>The integration of up-to-date information on waiting times in the electronic charts would require to publish new charts every few minutes because the waiting time is constantly changing.</i></p>
Annex II (6)	<p>Add traffic data.  Clarify the meaning of "information on port operations" in (b).</p> <p><i>Explanation:</i>  <i>Traffic data is a precondition for other services and should therefore be mentioned. As "the operational characteristics, roles and procedures for the RIS platform" is also mentioned in Article 4 paragraph 6 It is not clear what will be part of the implementing act and what will be part of the delegated act for the technical specifications.</i></p>
Annex II (7)	<p>Replace the title with "Availability of data for other digital systems or platforms".  Replace "interphases" with "interfaces" in (b).  Clarify the meaning of "the real-time exchange of information in particular for time-critical data;"</p> <p><i>Explanation:</i>  <i>Exchange is a two way requirement and the RIS Directive cannot introduce requirements for systems that are outside of the scope of application. What is time-critical data? Unclear and in combination with real-time exchange very questionable.</i></p>

Annex II (8)	<p>Delete</p> <p><i>Explanation:</i> (8) has to be deleted because it is a duplication of (7).</p>
Annex II (9)	<p>Add the items of Annex I under (b).  Replace "waiting times" with "RTA or average waiting times" in (b)(a).  Delete "discharge" and "predicted discharge" and replace "barrage status" with "barrage status if blocking navigation" and "predicted" with "forecast" in (b)(b).  Delete (b)(e).  Replace "be provided" with "provision of the information" in (c).</p> <p><i>Explanation:</i>  The provision of a technical specification for a European waterway network is missing (e.g. RIS-.net).  (b)(a): waiting times at locks are not harmonised and can be different for different vessels.  (b)(b): The benefit of making discharge a minimum requirement is questionable. The information "100 m<sup>3</sup>/s" is not useful.  The barrage status is only necessary if a barrage is blocking navigation.  We propose to replace "predicted" by "forecasted" (e.g. "weather forecast" is the more scientific term while a "weather prediction" is questionable).  (b)(e): weather information is available through many channels. There is no need to include it in RIS. An option to provide it via RIS is fine, but no obligation (cost/benefit). If it is really kept, it should be rephrased into "situational meteorological information for safety of navigation" (e.g. wind speed and direction at locks, etc.).  (c) The current wording would mean that the technical specifications for navigation and voyage planning shall be provided through Inland ECDIS, NtS and the RIS Platform.</p>
Annex III	<p>Replace "ES-RIS 2023/1" with "ES-RIS 2025/1".</p> <p><i>Explanation:</i>  ES-RIS 2023/1 will already be outdated when the amendment of the RIS Directive enters into force. ES-RIS 2025 should be adopted by CESNI plenary on 17. October 2024. If the General Approach will be adopted before, the new standard could be inserted in the Trilogue.</p>
	<p>Timely updating of Annex III</p> <p><i>Consideration point 19 refers to the timely manner of the updates of the annex of the Directive (EU) 2016/1629 via ES-TRIN. The approach is similar to that of Directive 2008/68. In both cases another organization adopts a document (in case of 2008/68 the ADN Contracting Parties adopt the ADN, in case of 2016/1629 CESNI adopts ES-TRIN), in both cases a coordination procedure has to take place and, in both cases, the external document is made mandatory by the EU.</i></p> <p><i>In case of ADN the working group discusses the changes in the last week of January, the Administrative Committee decides on these changes on the following day and the secretariat distributes the finalised documents on 1<sup>st</sup> of July. They enter into force 6 months later. The coordination procedure and the publication of the EU take place in the same period.</i></p> <p><i>In case of CESNI the discussion on technical level has to be finalised two and a half years before it enters into force. The example of ADN shows that a much quicker procedure within the external organization and within the EU is possible. If the Regulations of the EU</i></p>

*for alternative fuels (Directive 2016/1629) and automation (RIS Directive) want to keep pace with the fast development in those areas, which is absolutely necessary to meet the goals of greening, it will be necessary to speed up the processes for amendments of the annexes of the Directives.*

*A practical example regarding ES-RIS:*

*According to the current procedures of CESNI, the Temporary Working Groups have to finalise a proposal for ES-RIS in June of an odd numbered year (e.g. 2025) to become part of the ES-RIS edition of the next odd numbered year (e.g. ES-RIS 2027), which would enter into force via the delegated act on 1<sup>st</sup> January of the following even year (01.01.2028).*

*CESNI is currently working on the work program for 2025-2027. If this work program does not include the new points contained in this proposal, CESNI could only start to work on them in 2028. The TWG would have to finalise the drafts for the technical specifications in June 2029. They would be integrated in ES-RIS 2031 and enter into force on 01.01.2032. It really does not qualify as a "timely updating", if we have to wait until 2032 for the implementation of the technical specifications introduced in this proposal.*

*Even if the new points are taken into account in the working program 2025-2027, June 2025 would be the first occasion to deal with the new topics on technical level. It is not possible to develop e.g. technical specifications for the RIS platform or technical specifications for the exchange of data with other digital systems or platforms within one three-hour meeting. They will therefore only become part of ES-RIS 2029, which will enter into force in 2030. Six years is still far away from a "timely updating".*

*The goal can only be reached if the procedures within CESNI are simplified and sped up and the EC speeds up the process for the coordination procedure and the delegated acts as it has already done for the Dangerous Goods Directive.*