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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 the Netherlands

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

General comments:

We have read this compromise proposal with great pleasure again.

Regarding ERDMS : The Netherlands acknowledge the importance of ERDMS. RIS reference data and code tables are basic data required for the harmonised implementation of River Information Services. The use of these reference data ensure that the various RIS-services are linked correctly. The exchange of computerised data without direct human interference between the RIS users and the RIS services is facilitated by the use of these codes and references. To ensure proper exchange of data there are a number of pre-conditions. One of the pre-conditions is the all services and the respective systems are using the same codes and references at the same time. To meet this requirement there must be one central source in which this code is maintained and published, in our opinion ERDMS is intended as this central source operated and is today maintained by the EC.

The question could be raised whether the maintenance of such a database (read maintenance of the code and reference) is the core business of the EC or could be managed elsewhere. In our opinion, this daily maintenance of the code and references should be done by the same party that maintains ES-RIS (currently CESN), as this party is familiar with the standards and the code and references used in the standard. We would therefore like to propose that this relationship be clearly included in the recital.

Art	Par.	Art Text	Comment and questions
Whe reas	(8)	The electronic freight transport information ('eFTI') should form the basis for the exchange of cargo information on dangerous goods and waste between RIS users where required. When necessary, RIS should facilitate links with and should make information available to digital systems and platforms of other modes of transport.	<p>in the context of the RIS directive, RIS users are an extremely broad concept. It concerns anyone who does anything in relation to Inland Waterways. In the eFTI regulation, the scope of potential users is much smaller and for Economic Operators voluntary. The current phrase hints at an obligation for this group. We therefore propose to bring the sentence into line with the eFTI regulation in terms of users and make its use optional.</p> <p>Proposal :</p> <p>The electronic freight transport information ('eFTI') should could form the basis for the exchange of cargo information on dangerous goods and waste between RIS users Economic Operators where required. When necessary, RIS should facilitate links with and should make information available to digital systems and platforms of other modes of transport.</p>

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