

# **EU Strategy for the Danube Region**

Priority Area 1a - To improve mobility and multimodality: Inland waterways

# **RESULTS**

of the

# SURVEY ON BORDER CONTROLS

# along the Danube and its navigable tributaries

Authors:

Katja Rosner (viadonau)

Simon Hartl (viadonau)

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1	Gen	eral information	3				
2	Part	icipation in the survey	4				
3	Dura	ation of the control processes	6				
4	Invo	lved control bodies	9				
5	Feed	Iback on the control processes	. 10				
	5.1	Mohács	11				
	5.2	Bezdan	13				
	5.3	Batina	14				
	5.4	Vukovar	15				
	5.5	Beograd	16				
	5.6	Veliko Gradište	17				
	5.7	Moldova Veche	18				
	5.8	Orşova	19				
	5.9	Dobreta-Turnu Severin	20				
	5.10	Calafat	21				
	5.11	Bechet	22				
	5.12	Corabia	23				
	5.13	Zimnicea	24				
	5.14	Rouse	25				
	5.15	Giurgiu	26				
	5.16	Călăraşi	27				
	5.17	Brălia	28				
	5.18	Galați	29				
	5.19	Giurgiulești	30				
6	Sum	marized feedback	.31				
7	Cond	clusions and next steps	. 34				
Δr	Annex: Feedback form on horder controls (English version)						



## 1 General information

About 42% of the navigable Danube and large parts of the Sava constitute state borders. With national stretches between 138 and 1,075 km and average transport distances exceeding 1,000 km, crossing borders is common to the vast majority of transports along the Danube and Sava.

The Danube waterway crosses borders to EU-Member States which are part of the Schengen Area (Germany, Austria, Slovakia, Hungary), to EU-Member States which are not yet part of the Schengen Area (Croatia, Romania, Bulgaria) and to States which are no members to the EU (Serbia, Moldova, Ukraine).

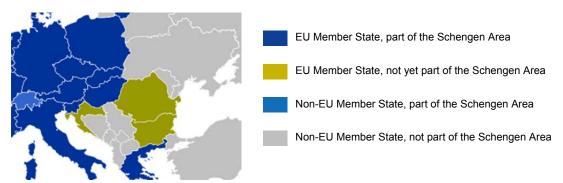


Figure 1: EU and Schengen Members

Throughout the last years shipping companies and ship brokers repeatedly raised the issue of organising border controls more efficiently and less time consuming. Given the fact that Danube navigation is working with a low profit margin and often has to deal with fierce competition from other modes of transport, the reduction of additional costs caused by unpredictable and long-winded administrative processes can be a major contribution to support a modal shift towards inland waterways. This is in line with European and national transport policy objectives to increase the modal share of inland navigation.

As the involved control authorities are currently urged to increase the effectiveness of controls along the EU's external borders, the time seems promising to jointly set up a more efficient control system which will reduce adverse effects on the transport companies' everyday business to a minimum meaning that the control processes are organised in a time-saving, transparent and predictable manner. At the same time the harmonisation of control processes along the Danube would help to speed up the administrative work for those vessel operators who comply with the applicable law and fulfil international obligations.

This survey on border control processes aimed at gathering a feedback on currently applied control procedures along the Danube from the perspective of skippers. The results should contribute to identifying the most pressing issues and thus give way to suitable improvement measures. Identified problems and suggested improvements will support the Technical Secretariat of the EU Danube Region Strategy 1a to enter future discussions with solid arguments and give it a mandate to initiate necessary measures.

The Technical Secretariat of Priority Area 1a of the European Strategy for the Danube Region, which is concerned with improving mobility and multimodality in relation with inland waterways, initiated the survey. It was distributed electronically via <a href="https://www.danube-navigation.eu">www.danube-navigation.eu</a> and with the help of Priority Area 11 as paper version at border control points.



## Key facts on the survey

Duration: November 2014 - May 2015

Methodology: Online survey and paper based survey at border crossing points and locks Number of participants: 177 validly completed forms (34 online, 143 at border control points)

# 2 Participation in the survey

Feedback was received related to control processes at 19 different border control points along the Danube. The vast majority refers to controls conducted by Romanian authorities. Unfortunately feedback on the controls at Croatian and Bulgarian control points was very scarce.

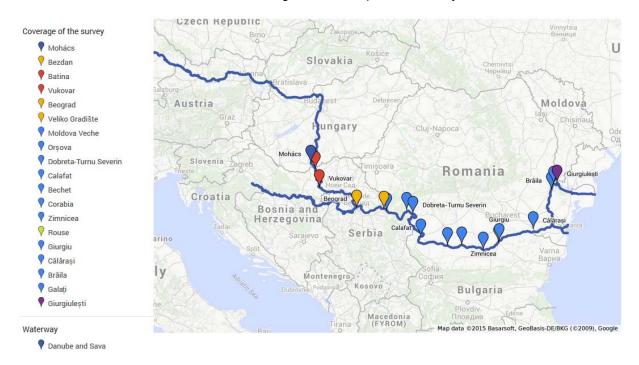


Figure 2: Location of border control points for which feedback was received



Altogether 177 feedback forms were validly completed. The higher the number of feedback forms and the higher the language variety respectively the origin of the skippers, the more meaningful is the result for a specific border crossing point.

The highest number of feedback forms was filled in for Mohács (32 forms) and Galaţi (30 forms). While all the forms relating to Galaţi were completed in Romanian language, the feedback for Mohács shows a large variety in language and covers all available versions. Thus the results are considered as representative and highly meaningful, they should be taken seriously.

For border crossing point where only a view feedback forms were returned or the language variety is low, the results should be treated with caution; further investigations may be needed prior to planning any improvement measures.

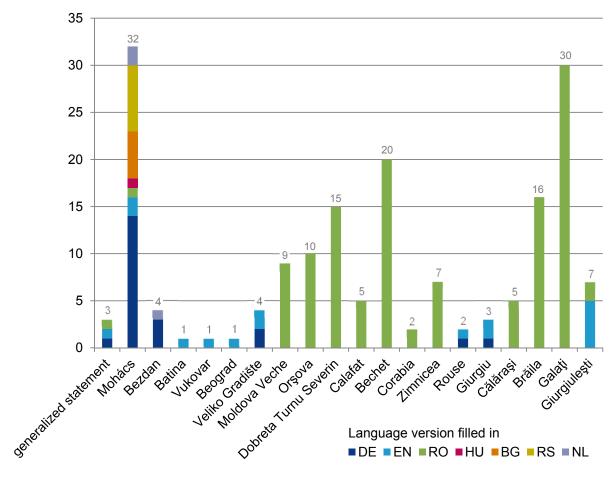


Figure 3: Coverage of the survey

The majority of questionnaires were filled in as paper based versions at the border crossing points directly (143 out of 177). The way how the forms were distributed and collected by the control authorities was not monitored and may differ from place to place.



## 3 Duration of the control processes

The duration of the control process comprises both, the waiting time before the control and the duration of the control itself. The total idle time prolongs the travelling time of vessels and therefore increases transportation costs.

In most cases the waiting time before the control accounts for large parts of the total idle time at one control point. Based on the results of this survey, the mean waiting time at the control points along the Danube amounts to 1 hour and 25 minutes, the mean duration of a control is 1 hour and 5 minutes.

However, control processes and their duration vary substantially between controls conducted at border crossing points and at ports. At the border crossing points in Mohács, Bezdan and Veliko Gradište ships, personnel and passengers are controlled along the waterway. There the mean waiting time before the control is significantly higher and amounts to 2 hours and 20 minutes, whereas at ports skippers had to wait an hour on average. On top of that, the duration of controls at the three border crossing points is twice as long (1 hour and 50 minutes) than in ports (50 minutes).

Figure 4 shows the idle time at the different control points. The results have to be seen in light of the number of feedback forms received for each point. Giurgiu shows for example a very long mean waiting time of 12 hours, while only two forms were filled out. One skipper had to wait 12 hours due to the opening hours; the other did not enter any information related to the waiting time. Further investigations would be valuable.

Idle times seem especially high at Bezdan and Veliko Gradište, followed by Giurgiuleşti, Mohács and Moldova Veche.

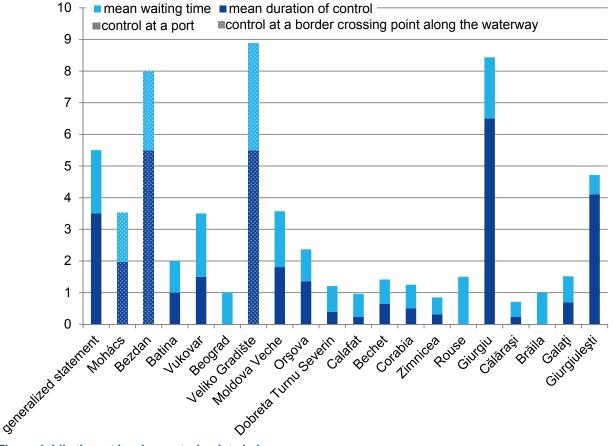


Figure 4: Idle time at border control points in hours



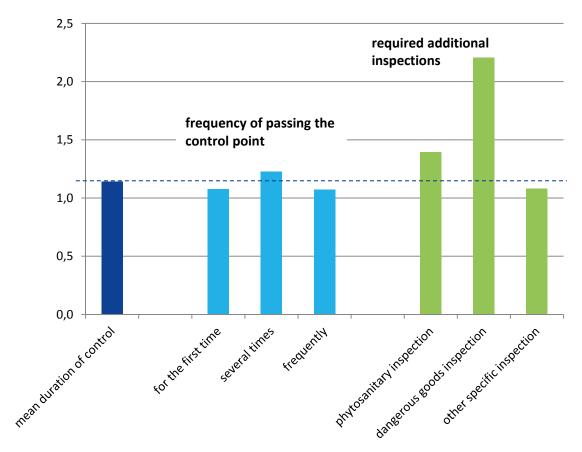


Figure 5 shows the mean duration of controls depending on the frequency a skipper passes a control point and the type of required additional inspections. While being familiar with the control processes does not seem to influence the duration of the control process, additional inspections certainly do.

If a dangerous goods inspection is required, the mean duration of controls doubles to 2 hours and 15 minutes. A phytosanitary inspection took one hour and 25 minutes on average. Other specific inspections, as the passport control of passengers did not have any significant influence on the duration of controls, the value is even a bit lower than the mean duration for all controls.



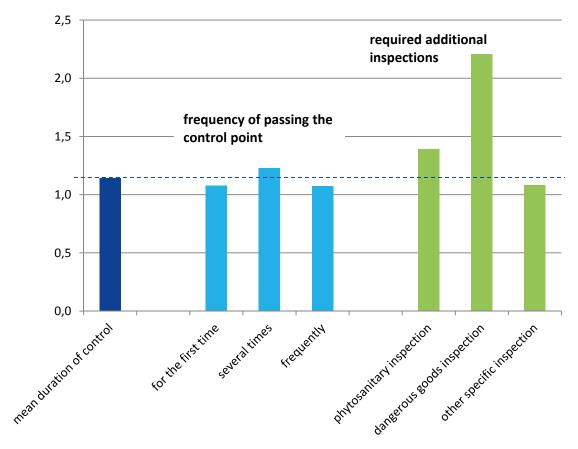


Figure 5: Mean duration of controls depending of passing frequency and type of inspection



## 4 Involved control bodies

According to the received feedback forms, the number and composition of control authorities varies from control point to control point. Figure 6 shows the percentage of controls with an involvement of different authorities for each location.

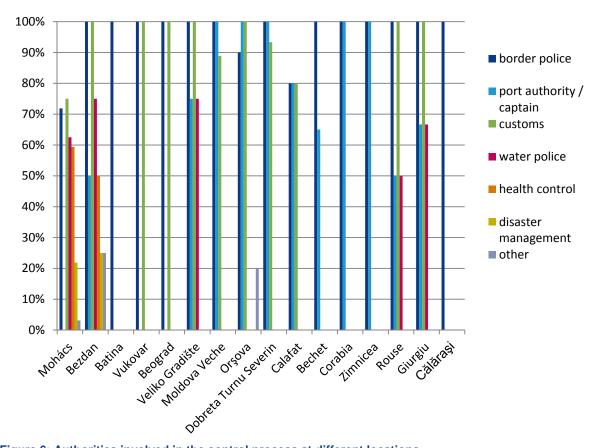


Figure 6: Authorities involved in the control process at different locations

The number of involved authorities is especially high at Mohács, Bezdan, Veliko Gradište and Giurgiuleşti. Whereas it is surprising, that no customs control seems to be necessary at Bechet, Corabia and Zimnicea.

Wherever a high number of control authorities was involved, the mean duration of the control was also high (see Figure 4: Idle time at border control points in hours).

The most frequent entry in the category "other" was an agent, who accompanies the skipper throughout the steps of the control process and supports them when filling in the forms. At Mohács also the anti-corruption agency took part in a control.



## 5 Feedback on the control processes

In the first section of the questionnaire general questions with reference to the circumstances of the control (e.g. place and duration of control, involved control bodies, type of inspection) were asked. The outcomes have been described within the previous chapters.

While those questions set the frame for the analysis of replies, the second section of the questionnaire includes the actual feedback on the control processes. The following statements were made and could be rated by the participants on a five-part scale from "strongly agree" to "strongly disagree".

- The border control procedure was transparent to me.
- The waiting time before the start of the control procedures was reasonable.
- The duration of the control procedures was reasonable.
- I have been treated in a fair and just manner.
- Official opening hours of all control authorities were respected.
- I consider the quantity / level of detail of data asked from me as reasonable.
- The control authorities are well coordinated.
- I had to pay fees or fines. (yes or no)
  - o If yes: The payment of fees and fines was justified.

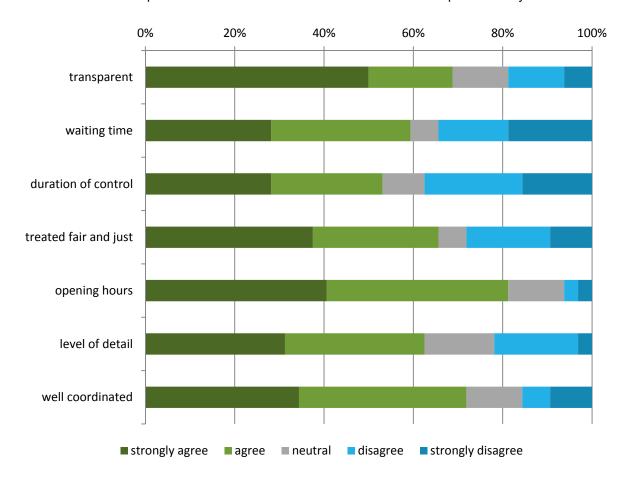
Finally open questions allowed participants to express their thoughts in own words related to any inconveniences or difficulties they encountered as well as improvements they would suggest.

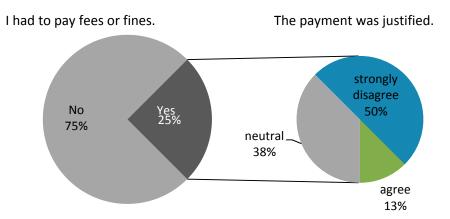
The guestionnaire can be found in the Annex to this report.



## 5.1 Mohács

Related to the control processes at Mohács 32 feedback forms were completed validly.







#### Difficulties and inconveniences

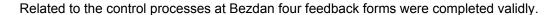
- Unreasonably long waiting times prior to the control
- The combined controls of several authorities lead to additional delays
- Improper and incorrect treatment by the authorities, especially at night
- Intimidating and insulting environment due to numerous control personnel entering the ship
- Among the dozen people entering the ship only one or two speak the required language at times
- Required documents are often mono-lingual and cause difficulties to the control authorities
- Even if the ship, the certificates and other documents stay the same, repeated controls are necessary
- One and the same document has been accepted by an authority and declared invalid by another authority a few days later
- Facial controls of passengers leaving the EU do not seem reasonable and cause dissatisfaction of tourists
- Fines did not seem justified in several cases, written complaints at the Ministry did not show any effect

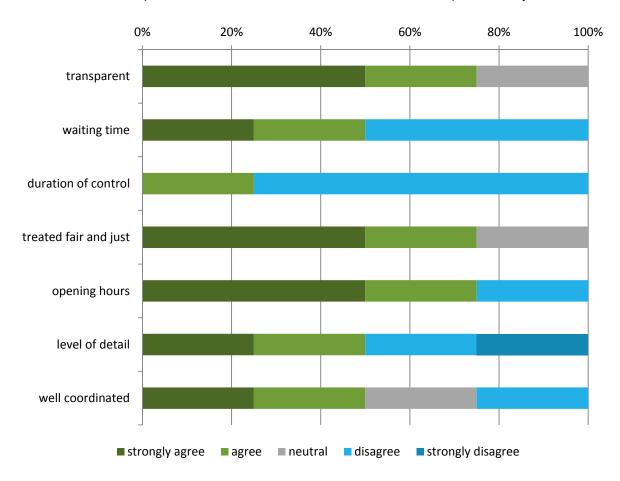
### Suggested improvements

- Separate border revisions from controls by the water police, which could be done efficiently under way
- Conduct controls time-efficiently and reduce the total idle time substantially
- Control also passenger ships by service boat in order to save time
- Authorities should treat skippers respectfully and in a polite way
- Reduce the number of control personnel entering the ship, six people should be sufficient
- > Use redundant personnel to inspect several ships at the same time
- Improve the language skills of the control authorities
- Develop harmonized forms for all authorities and countries
- > Enable the submission and evaluation of personal data from crew and passengers in advance
- Reduce the time of controls by enabling the submission and processing of ship and freight related documents in advance
- Documents and ship certificates should be issued in four languages at least (DE, EN, NL, FR)
- Make use of the AIS system to schedule the arrivals and receive information on the ships
- Store the validity of ships' certificates and other ship related data in a database in order to avoid redundant controls
- The Pannonris website is not fully compatible with on-board systems, filling in the passenger and crew list is time-consuming
- As Croatia is part of the EU, controls should be abolished
- Provide this questionnaire also for takeaway at the control post



### 5.2 Bezdan





None of the four survey participants had to pay a fee or fine.

### Difficulties and inconveniences

- Unreasonably long control duration, also for empty ships
- Abuse of power and arbitrariness in the interpretation of law and rules
- Non-service oriented attitude and exaggeration of small administrative errors or ambiguities

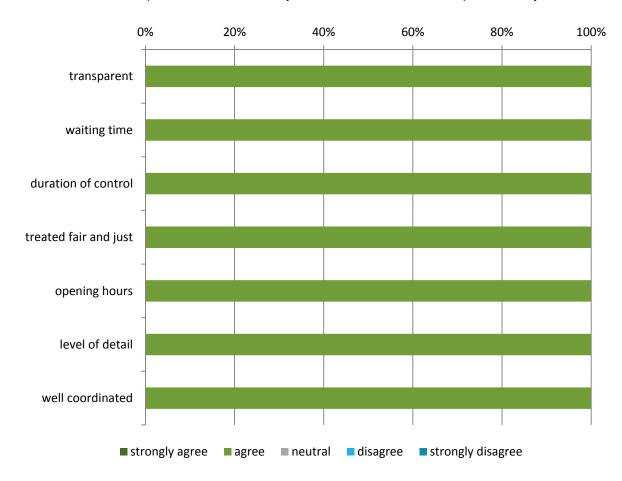
#### Suggested improvements

- Reduce the time of controls by enabling the submission and processing of ship and freight related documents in advance
- > Engage additional personnel



## 5.3 Batina





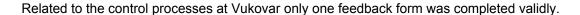
The survey participant did not have to pay a fee or fine.

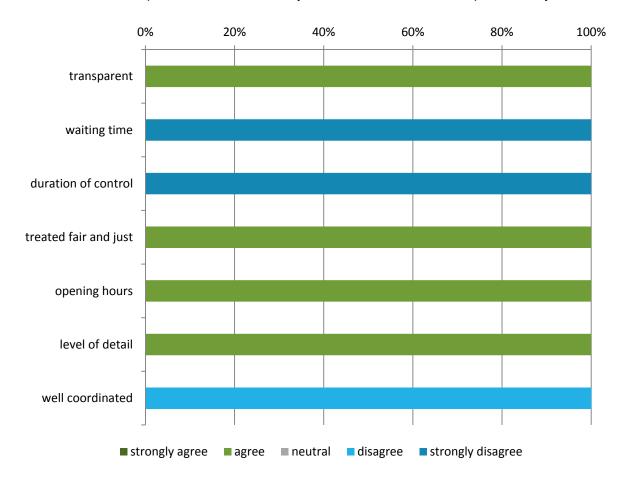
#### Difficulties and inconveniences

The absence of customs clearance in Batina causes confusion at Mohács. Customs control is only done when entering Croatia.



### 5.4 Vukovar





The survey participant did not have to pay a fee or fine.

#### Difficulties and inconveniences

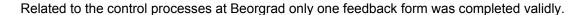
- Controls in Vukovar take too long
- Duration of passport controls seem arbitrary
- Recently facial control became obligatory for incoming ships from Serbia

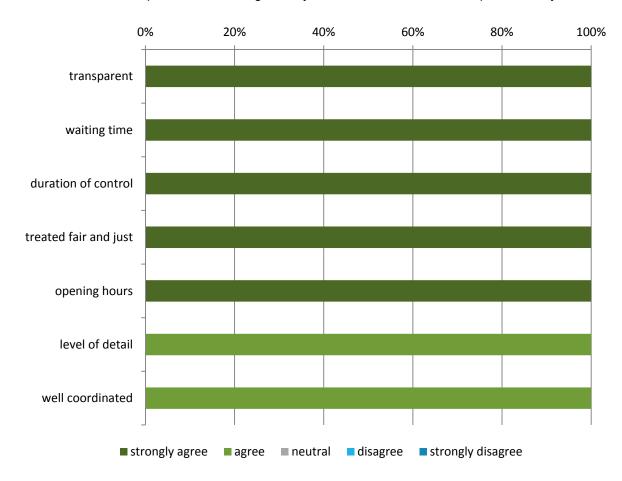
## Suggested improvements

Install a database to store standard information on ships, which rarely change (e.g. validity periods of certificates)



## 5.5 Belgrade





The survey participant did not have to pay a fee or fine.

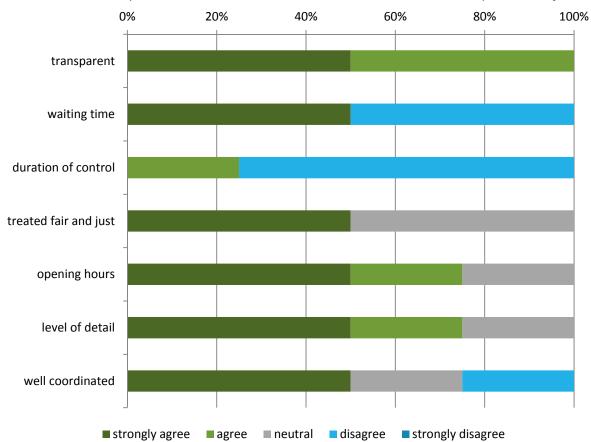
### Difficulties and inconveniences

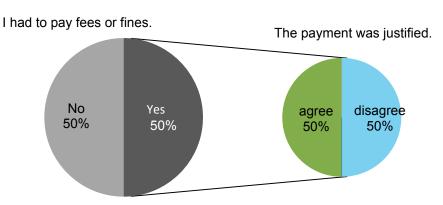
- Visitors are not allowed on board, while the ship is docked on a customs pontoon
- Belgrade is one of the most convenient control points along the Danube



### 5.6 Veliko Gradište

Related to the control processes at Veliko Gradište four feedback forms were completed validly.





#### Difficulties and inconveniences

- · Unreasonably long duration of controls, also for empty ships
- At times bribe money is asked to speed up procedures and the vessels' clearance

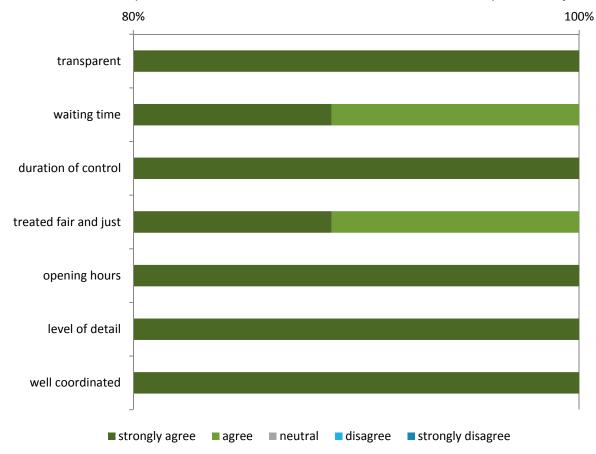
### Suggested improvements

- Reduce the time of controls by enabling the submission and processing of ship and freight related documents in advance
- > Speed up the formalities and avoid bureaucracy
- Minimize waiting times prior to the actual control



## 5.7 Moldova Veche



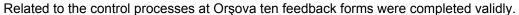


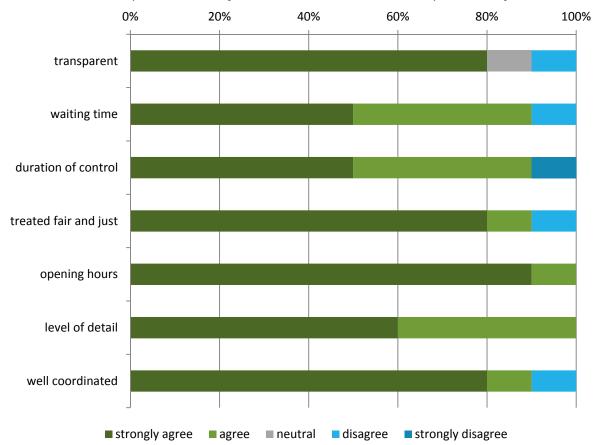
None of the nine survey participants had to pay a fee or fine.

## Difficulties or inconveniences and suggested improvements



## 5.8 Orşova





None of the ten survey participants had to pay a fee or fine.

## Difficulties and inconveniences

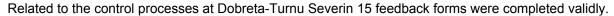
- Very long waiting time
- Filling in forms is inconvenient over a ships' railing

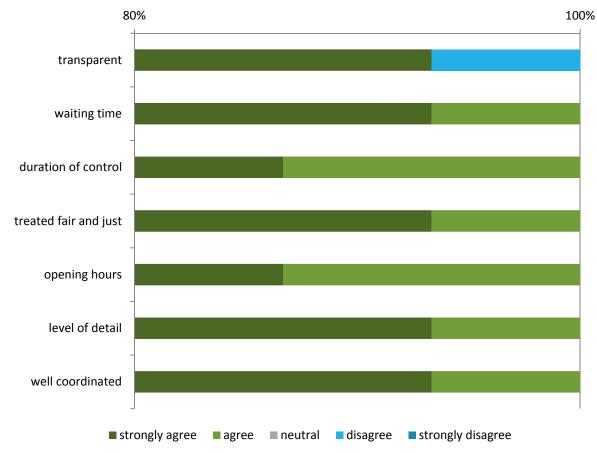
## Suggested improvements

Reduce the number of documents to be filled in



## 5.9 Dobreta-Turnu Severin





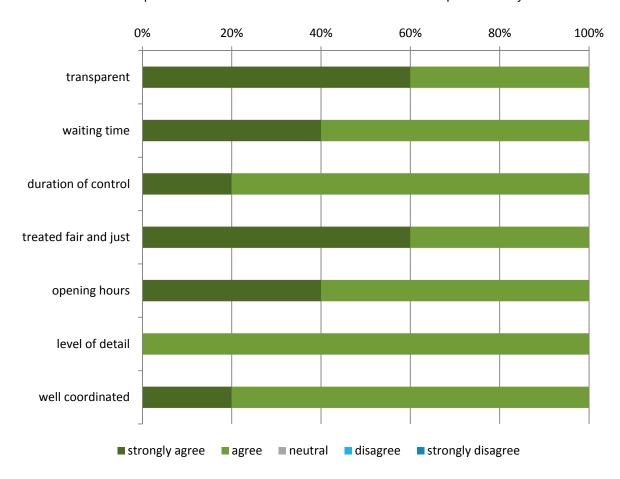
None of the 15 survey participants had to pay a fee or fine.

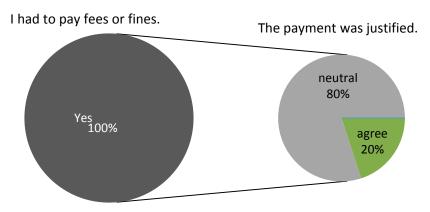
## Difficulties or inconveniences and suggested improvements



## 5.10 Calafat

Related to the control processes at Calafat five feedback forms were completed validly.



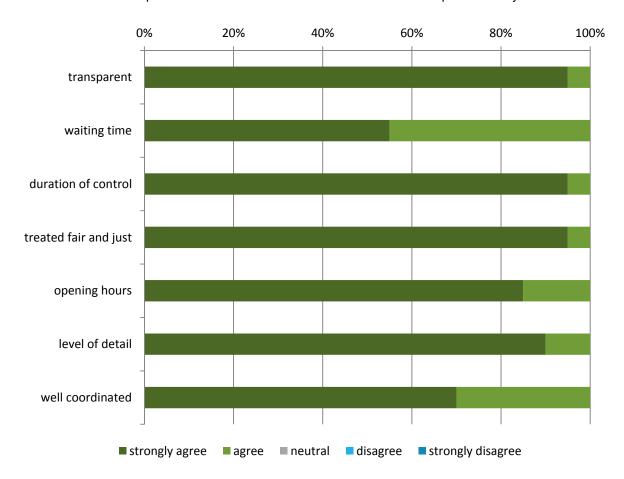


## Difficulties or inconveniences and suggested improvements

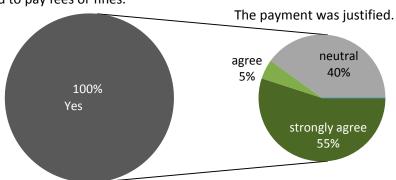


## 5.11 Bechet

Related to the control processes at Bechet 20 feedback forms were completed validly.



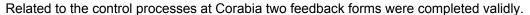


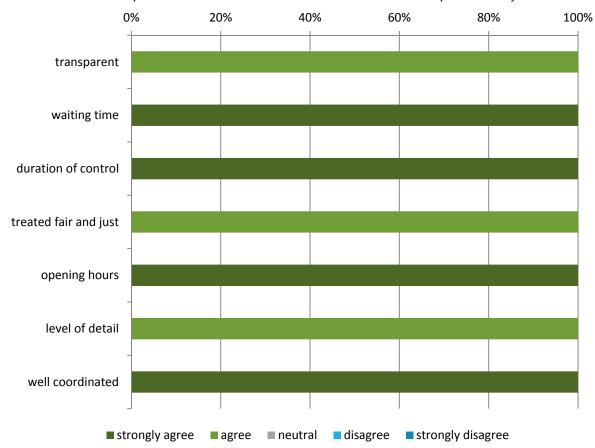


### Difficulties or inconveniences and suggested improvements



## 5.12 Corabia





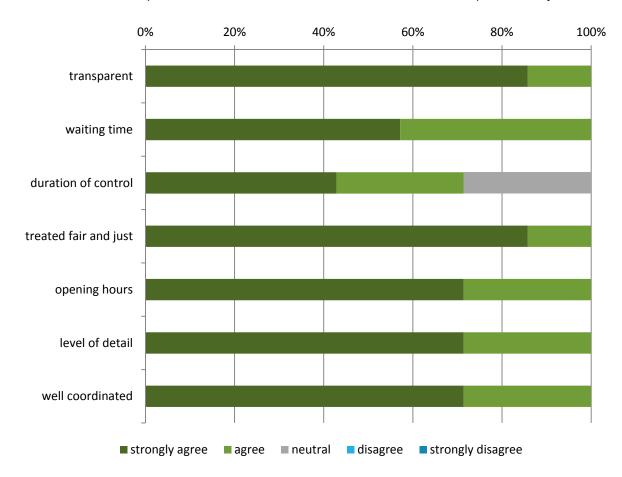
None of the two survey participants had to pay a fee or fine.

## Difficulties or inconveniences and suggested improvements



## 5.13 Zimnicea

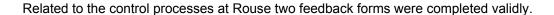
Related to the control processes at Zimnicea seven feedback forms were completed validly.

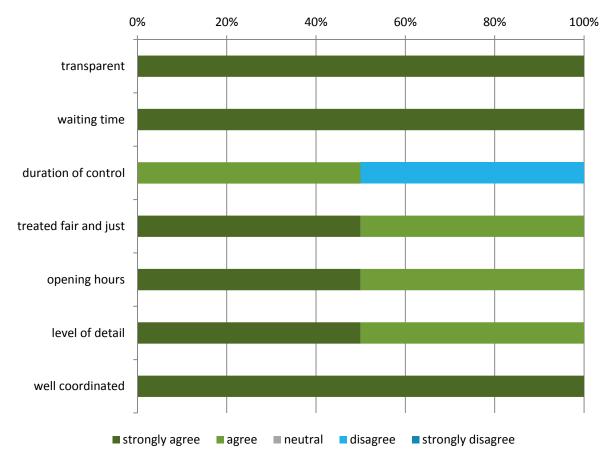


None of the seven survey participants had to pay a fee or fine.



## **5.14 Rouse**





The survey participants had not to pay any fee or fine.

#### Difficulties and inconveniences

• Revision on entrance and exit take far too long, even for empty ships

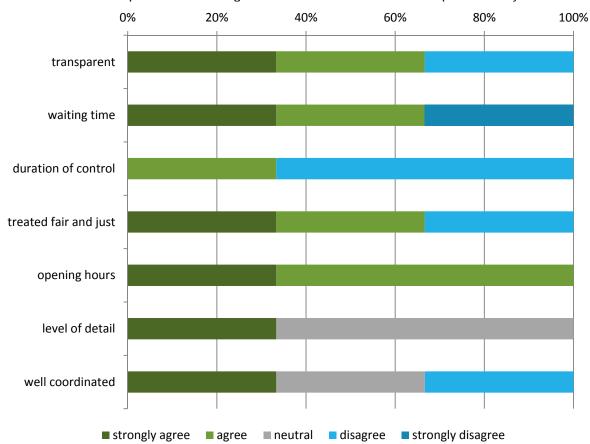
### Suggested improvements

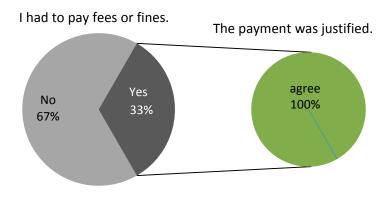
- Reduce the time of controls by enabling the submission and processing of ship and freight related documents in advance
- > Implement one document which can be used along the entire Danube



### 5.15 Giurgiu

Related to the control processes at Giurgiu three feedback forms were completed validly.





### Difficulties and inconveniences

• Extreme long waiting time due to restrictive opening hours

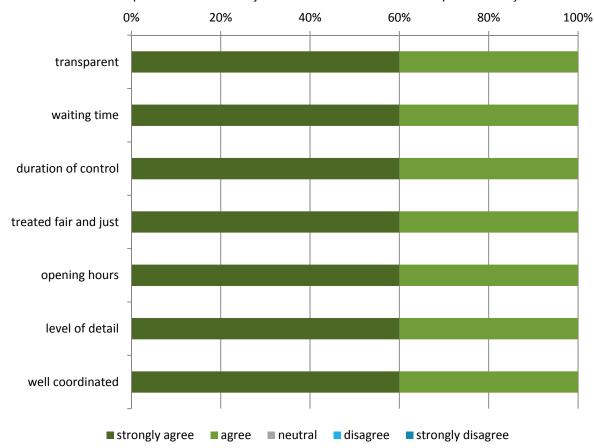
### Suggested improvements

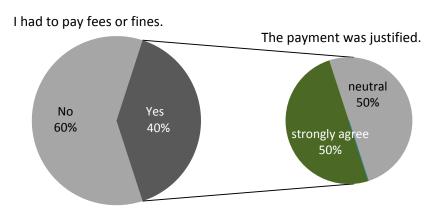
- Extend the working hours of control authorities to 24/7
- > Reduce the time of controls by enabling the submission and processing of ship and freight related documents in advance
- Implement harmonized declarations and documents which can be used along the entire Danube



## 5.16 Călărași

Related to the control processes at Călărași five feedback forms were completed validly.

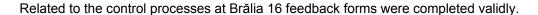


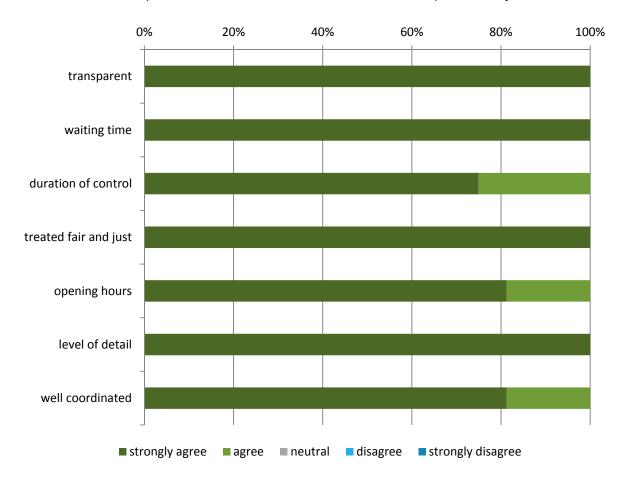


### Difficulties or inconveniences and suggested improvements



## 5.17 Brălia





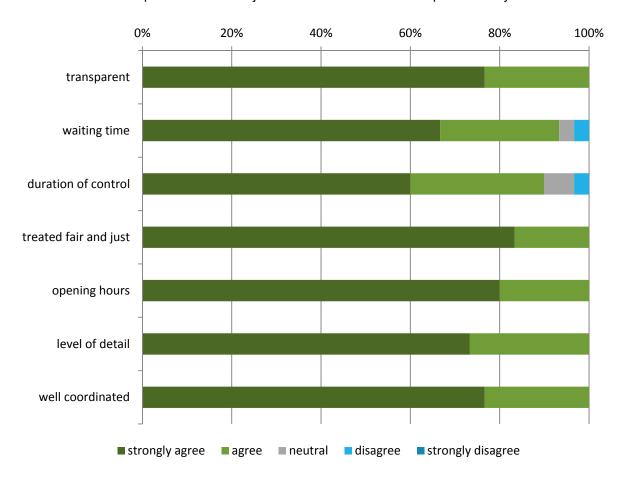
None of the 16 survey participants had to pay a fee or fine.

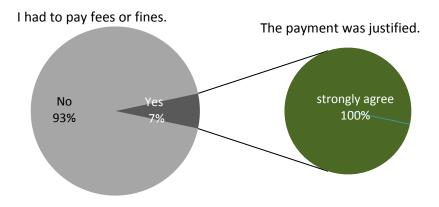
## Difficulties or inconveniences and suggested improvements



## 5.18 Galați

Related to the control processes at Galaţi 30 feedback forms were completed validly.



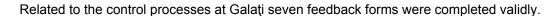


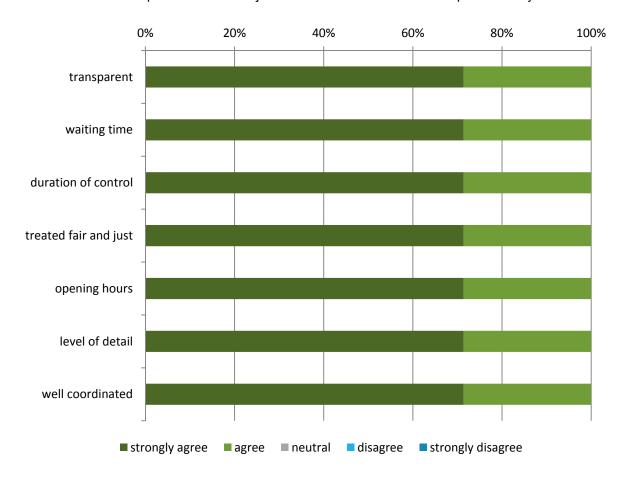
## Suggested improvements

- Simplify the control process
- > Reduce the waiting time for the control team



# 5.19 Giurgiulești





None of the six survey participants had to pay a fee or fine.

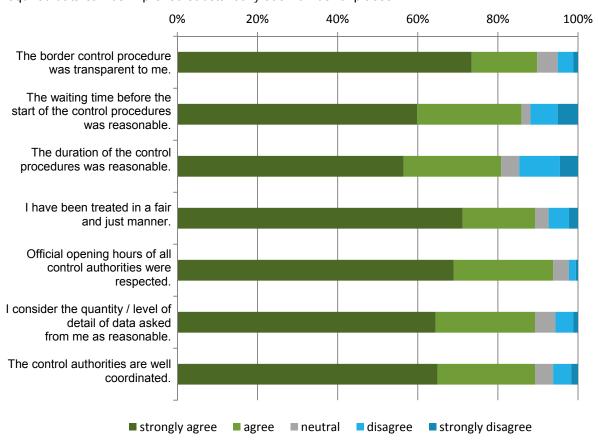
## Difficulties or inconveniences and suggested improvements



## 6 Summarized feedback

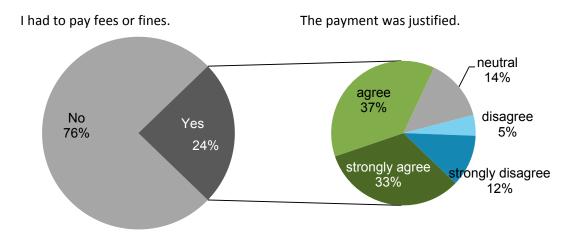
All together 177 feedback forms were completed validly, whereby the majority (143 forms) were filled in as paper based version at the border control points directly. The most meaningful feedback was received for Mohács, where the number of forms and the language variety was the highest. The large number of feedback forms received for Romanian control points influenced the overall outcome of the survey substantially (122 out of 177 forms).

In summary, the feedback of transport companies and ship brokers on control procedures is quite positive. Nevertheless, improvements related to the waiting time before controls and the duration of the control itself seem to be important in order to ensure more efficient administrative processes and to eliminate unnecessary hindrances for transports on the Danube waterway and its tributaries. Also other aspects, like the transparency of the procedures, the coordination between control authorities, the harmonisation of administrative forms, the way how skippers are treated as well as the amount of required data can be improved substantially at a number of places.



A quarter of all the survey participants had to pay a fee or fine. While most of them agree, that the payment was justified, 17% dispute that it was legitimate. The percentage of skippers who had to pay a fee or fine differs considerably between the control points. In Bechet, for example, all 20 survey participants (100%) had to make a payment. Approval of the required payments varies as well, half of the penalized survey participants strongly disagreed, when they were asked if the payment was justified.





#### Difficulties and inconveniences

#### Time consuming controls

Survey participants stated repeatedly, that the waiting times prior to the control are too long. Extensive durations of the actual controls add up to the total idle time and are reason for dissatisfaction. Especially the duration for the control of empty ships seems unreasonable.

Single responses, referring to only one control point highlighted that combined controls of several authorities lead to additional delays (Mohács), the duration of passport controls seems arbitrary (Vukovar) as well as extreme long waiting times due to restrictive opening hours (Giurgiu).

### Required documents

Certificates, patents and other required documents are often-monolingual and therefore cause difficulties for the control authorities. The acceptance of these documents therefore varies from country to country. At the same time control forms requested to be filled out by the skippers are not harmonised along the whole Danube meaning that they are often not available in a multilingual version or request for different data and information. Repeated in-depth controls of static information (e.g. time of validity of ship certificates) seem to be without merit but are source of annoyance. At the same time consistent standards for the implementation of border controls are said to be lacking.

#### Improper treatment by the authorities

Both, in connection with controls in Mohács and Bezdan survey participants mentioned repeatedly that they felt treated improperly and incorrect by the authorities. Numerous control personnel entering the ship was described as intimidating. The insulting environment and arbitrariness in the interpretation of laws contradicts the service oriented attitude, which is expected from the control bodies.

#### Unreasonable control procedures

Facial controls of passengers leaving the EU do not seem reasonable and cause dissatisfaction among tourists. Also passengers aboard of incoming ships from Serbia are obliged to undergo a facial control. Coordination between Border Control Points could be improved; one example is the absence of customs clearance in Batina (HR) which caused confusion at Mohács (HU).

#### Unjustified payments

Several participants reported unjustified a payment of fines at Mohács. Also complaints at the Ministry did not show any effect. One feedback form complained about bribe money being asked at Veliko Gradište.



#### Suggested improvements

#### Reduce idle time at control points

As time efficient controls were the most pressing issue to the majority of the survey participants several suggestions for improvements were made. By far the loudest voiced was to enable the submission and subsequently the processing of ship, freight and passenger related data in advance and thus reducing the duration of the control. A suggestion, in connection with the reduction of waiting times, was to use additional personnel to control several ships at the same time. In addition the AIS system could be used to schedule the arrivals.

### Simplify and harmonize forms and documents

In general, the number of documents to be filled in should be reduced. It was strongly recommended to develop harmonized forms for all authorities and countries along the entire Danube. As the required documents are used in an international environment, they should be issued in multilingual versions. Rarely changing standard information on ships should be stored in a database, accessible to the control authorities, avoiding for example the repeated control of certificates validity. The submission and evaluation of ship, freight and personal data should be enabled in advance to the actual control.

#### Conduct controls service-oriented

Skippers wish to be treated in a respectful and polite way. The number of officials entering the ship should be limited, as they intrude upon the privacy of the ship's crew. Obligations and requirements towards the transport companies should be communicated in a transparent and service-oriented way to the skippers in order to ensure effective and efficient control procedures (for instance through a website or a publicly available manual). Improved language skills of the control authorities would be beneficial for communication.

## Improve the control processes

The AIS system could be used to schedule arrivals of ships at the control points and thus avoid lengthy waiting times. Information on the ship certificates including their time of validity and other rarely changing information may be stored in a database in order to avoid redundant controls. Improvements to the Pannonris should include an increased compatibility with on-board systems and a possibility to making the completion of passenger and crew lists more time-efficient. Working hours of control bodies should be 24/7 in order to avoid competitive disadvantages compared to other modes of transport.

Two propositions referred to the control process in Mohács specifically. One was to separate border revisions from the controls by the water police, which can be done more efficiently under way, may save time. The other was to inspect passenger ships also by service boat to save time.



## 7 Conclusions and next steps

In conclusion, a great number of feedback forms were returned and meaningful results have been retrieved for several Border Control Points, notably for Mohács.

Responses to the questions referring to general information on the controls showed that Border controls are time consuming, with waiting times prior to the control often exceeding the actual duration of control. Dangerous goods inspections take even twice as long as standard controls. The number of involved control authorities varies from place to place and shows a strong interconnection with the average duration of controls.

The feedback on the control process itself was positive in summary but revealed several aspects which have been strongly recommended to be improved. The results show the specific strengths and weaknesses of all the evaluated control points. However, some important suggestions are applicable for the whole Danube. The most pressing issues were the reductions of waiting times as well as the duration of controls. A simplified and harmonized set of forms should be used throughout all the involved authorities and countries. On top of that, the submission and processing of the requested information should be enabled in advance to the control. But also a respectful interaction with the controlled skippers, crew and passengers was demanded.

Serving as a valuable starting point, the results of the survey will be used to set further steps. First of all, the Technical Secretariat of PA1a decided to make this report publically available on its website <a href="https://www.danube-navigation.eu">www.danube-navigation.eu</a>. In addition, it will be brought to the attention of PA11, the members of the DARIF project and the evaluated Border Control Points. Also the shipping sector will be informed about the outcomes of the survey. Reactions from whichever side are welcome.

As documented in the related work plan of PA1a, the next steps include a practical manual on border control procedure and final recommendations. The manual on control procedures is planned for summer 2015 and will describe the control processes along the Danube at the numerous Control Points. It will also include the forms requested to be filled in by the control authorities. The final recommendations will be made by autumn 2015 and shall serve as basis for further initiatives in coordination with decision makers and responsible control authorities.



Annex: Feedback form on border controls (English version)

# Poll on administrative processes

Are you a skipper of a cargo vessel? Have you recently crossed any EU border on the Danube or its navigable tributaries?

## Help us to improve administrative procedures!

Filling out this feedback form will only cost you 5 to 10 minutes. Your responses will be treated anonymously.

The results of this feedback form will be brought to the attention of the involved control authorities and decision-makers at the EU-level.

The results of our initiative to reduce administrative barriers in Danube navigation will be published via this website (<a href="www.danube-navigation.eu">www.danube-navigation.eu</a>) in spring 2015.

#### Important information

When answering the questions and giving examples please refer to the most recent control at one specific check point.



General information about the border control									
Control Point (place):									
aiting time at the border before being controlled (h):									
Duration of the control procedures (h):									
Involved control bodies:									
I pass(ed) the control point:   for the first time   several times   frequently									
My cargo required a									
phytosanitary inspection dangerous goods inspection other specific inspection:									
Feedback on the control process									
·	strongly agree	agree	neutral	disagree	strongly disagree				
The border control procedure was transparent to me.	0	0	0	0	0				
The waiting time before the start of the control procedures was reasonable.	0	0	0	0	0				
The duration of the control procedures was reasonable.	0	0	0	0	0				
I have been treated in a fair and just manner.	0	0	0	0	0				
Official opening hours of all control authorities were respected.	0	0	0	0	0				
I consider the quantity / level of detail of data asked from me as reasonable.	0	0	0	0	0				
The control authorities are well coordinated.	0	0	0	0	0				
I had to pay fees or fines.	☐ Yes ☐ No								
If yes: The payment of the fees and fines was justified.	0	0	0	0	0				
Did you encounter any difficulties or inconveniences during your last border control? If yes, please specify below:									
Which improvements regarding the procedure of border controls would you suggest?									



#### Who are we and what is our motivation?

Priority Area 1a of the European Strategy for the Danube Region is concerned with improving mobility and multimodality in relation with inland waterways. The efforts are coordinated by the Austrian and Romanian Ministry of Transport jointly. One of our working priorities is to improve and simplify administrative procedures in connection with inland waterway transport.

#### How can you participate in simplifying border controls?

By filling out the feedback form you set the first step to improve border control procedures. The problems you identify and improvements you suggest will help us to enter future discussions with solid arguments and give us a mandate to initiate necessary measures.

Please return the questionnaire until 31.03.2015 by conventional mail to: Technical Secretariat Priority Area 1a of the EU Strategy for the Danube Region Donau-City-Straße 1 1220 Vienna Austria

You may also fill in the questionnaire online on <a href="https://www.danube-navigation.eu">www.danube-navigation.eu</a>.

### What are we going to do with the results?

We will analyse the returned feedback forms and consequently draw conclusions, identifying the most pressing issues. We will formulate recommendations in relation to the border control procedures at each of the control points as well as in connection with the harmonization of processes along the Danube and its navigable tributaries. The recommendations will be brought to the attention of the involved control authorities and decision-makers at the EU-level.

## Which possibilities are there to see the results?

Conclusions and recommendations stemming from the feedback form will be available in spring 2015. The results will be published on our website: <a href="https://www.danube-navigation.eu">www.danube-navigation.eu</a>

If you prefer to receive the information personally you have the possibility to either join the group on www.danube-navigation.eu or to provide us with your contact information.

If you have further any questions about the survey, please email us: PA1a@viadonau.org							
We appreciate your input.							
$\square$ Yes, I do want to receive information about the results of the survey and further related activities by the Technical Secretariat of Priority Area 1a of the EU Strategy for the Danube Region.							
Name:							
E-mail address:							
Organisation:							
Postal Address:							
Country:							