

24 April 2009

**European Commission
DG Energy and Transport
TEN-T
B-1049 Brussels**
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Dear Sir/ Madam,

Following our 8th December letter to Mr Daniel Calleja, ACI EUROPE would like to further contribute to the European Commission's review of the Trans European Transport Network policy by means of responding to the "Green Paper on the future of TEN-T.

While agreeing with many of the objectives and issues raised by the Green Paper – a fundamental review of the policy rather than just a review of the priority projects – European airports feel, however, that a number of issues should be taken into account:

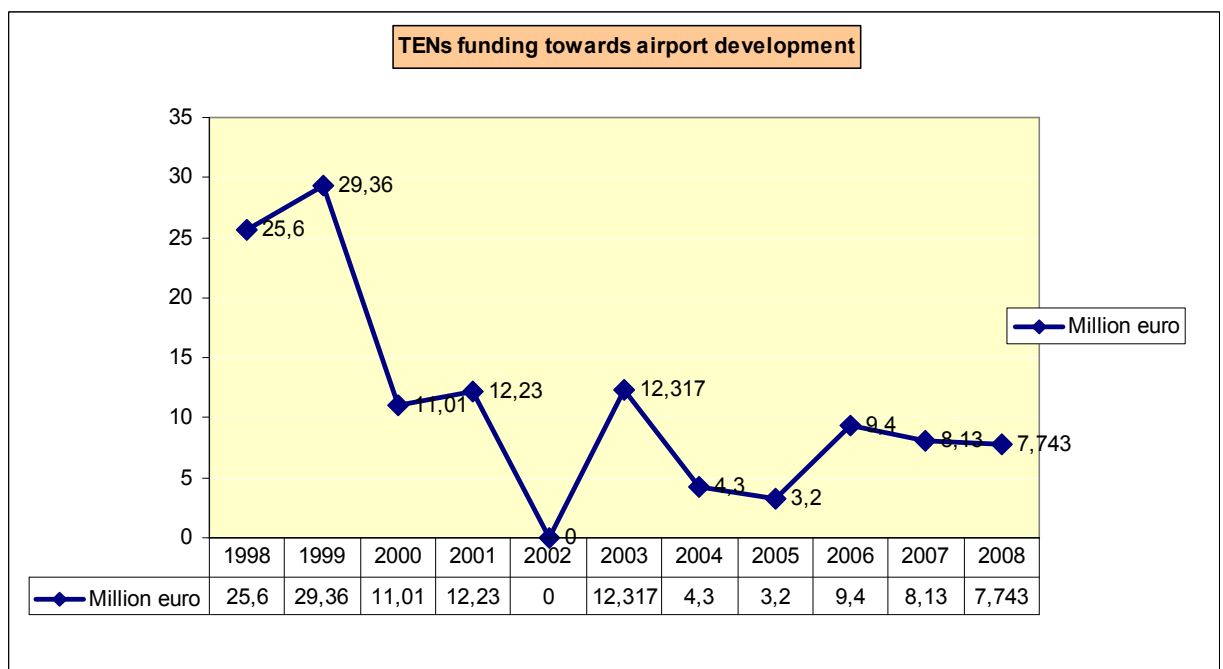
A) Foundations on which the future TEN-T Policy should rest and issues of interest to European airports:

1. A future TEN-T policy should address the new approaches to respond to future political, economical, environmental and technological challenges.
2. Such a policy should necessarily acknowledge the position of airports within the European Transport Networks and their specific function as facilitators of inter-continental and intra-European connections that are considered of major importance for Europe's position within the global economy.
3. The integration of the network should be strengthened, focusing on real co-modal solutions and underlying the importance of multimodal terminals. Complementing other modes of transport - facilitating different transport needs for passengers and freight - European airports aim at developing true multimodal terminals and at strengthening co-modal solutions. Airports integrate air transport, rail, and road as access points to the European Transport Networks.
4. Capacity constraints, congestion issues and access to airports are therefore key issues to be taken into account in any revision of the TEN-T policy.
5. The TEN-T policy should allow investment in traditionally ground based structures and equipment to be complemented with investment in innovative systems including Intelligent Transport Systems (ITS), an integrated ATM system, SES, SESAR (total aviation approach) as well as multi-modal facilities.
6. Infrastructure investment (including in security) needs long term planning. A more flexible approach would therefore allow airports to adapt to market uncertainties.

7. Traditional "large scale" TEN-T projects should be complemented by measures of smaller scope and shorter time span, including the enhancement or the optimisation of existing infrastructure.
8. The environmental dimension of the network should not be neglected. Measures that privilege carbon emission and noise reduction, local air quality, water and waste management should accompany more traditional investment.

B) Financing of the network:

1. Until now the instruments (including community, national and regional) have proved insufficient to finance the network. Since 1996, €400 billion have been invested and €500 billion are still to be invested between now and 2020.
2. 89 EC decisions allocating grants to airports were adopted, and 48 airports in 18 Member States benefited from the funding.
2. Member States should have more binding responsibilities in financing the network.
3. Community grant instruments (TEN-T budget, Cohesion Fund, European Regional Development Fund and loans from the European Development Bank) should be combined and planned in a more efficient way.
4. **A higher percentage of the Community financing should be allocated to airport projects, taking into account their contribution to the achievement of the internal market, social cohesion, regional development and employment, and the industry's needs to face traffic demand and regulatory burdens, in line with the EC Treaty and the Lisbon strategy. Moreover, the development of intelligent transport systems after 2004 (including ATM/ANS, SES and SESAR) imply increasing needs for investment in the sector that should be reflected in the future TEN-T policy. Below is a graphic showing the TEN-T funding for airport development in the last ten years:**



C) Planning of the network

The European Commission proposes three conceptual options for TEN-T planning which – with a view to their effective implementation – entail different requirements concerning the instruments.

We consider that the best approach proposed by the European Commission is that of the Dual layer: a comprehensive network and core network.

Layer 1: **Comprehensive network** maintained in its current form. However, more flexibility should be given to adapt and monitor the network and its instruments for a fully and timely implementation. For example, it would be useful to update the classification of airports and their role as interconnection points with other transport modes.

Layer 2: **Core network** consisting in:

- a) A **geographical pillar** (defined in concrete geographical terms). This includes a "priority network" (starting from the current priority project approach) linking up and extending major trans-national axes, providing for intermodal connecting points, covering issues like access to airports, dealing with congestion on the ground and including action in the field of ITS.
- b) A **conceptual pillar** providing the basis for the identification of projects, corridors and network parts over time. This pillar would go a step further from the current and disconnected "priority project list" (only the Milan Malpensa airport project and the new Lisbon airport are included in the list of 30 priority projects so far) **catering for a broader range of projects identified in an evolving way on the basis of pre-established specifications and criteria**. It has the advantage of reflecting the need for more flexibility and business orientation in the transport sector, responding to short and medium term needs as well as a strong innovation element (related to the ATM Master Plan).

ACI EUROPE would like to thank the European Commission for the opportunity to contribute to the revision of Decisions N° 1692/96/EC and N° 884/2004/EC on Community Guidelines for the Development of the Trans-European Transport Networks and looks forward to continuing our co-operation in the future.

Very best regards,

A handwritten signature in black ink, appearing to be 'P. Paul', written in a cursive style.