Spettabile Commissione Europea
DG Energia e Trasporti
TEN - T
B - 1049 Bruxelles
TREN-B1-GREEN-PAPER-TEN-T@ec.europa.eu

Genova, 30 Aprile 2009
Prot. n° 174808

Oggetto: Contributo al Libro Verde TEN-T: riesame della politica COM (2009) 44 definitivo

Spettabile Commissione,

In relazione alla procedura di consultazione sulla revisione del Libro Verde sui Trasporti, i sottoscritti enti ed associazioni hanno elaborato l'allegato documento congiunto con le osservazioni condivise delle Istituzioni e del mondo imprenditoriale, in particolare per quanto riguarda il sostegno del Terzo Valico e l'importanza del Progetto Prioritario 24.

Distinti saluti,

Regione Liguria
Il Presidente Ing. Claudio Burlando

Provincia di Genova
Il Presidente Dr. Alessandro Repetto

Comune di Genova
Il Sindaco Prof. Marta Vincenzi

Camera di Commercio di Genova
Il Presidente Dr. Paolo Odone

Autorità Portuale di Genova
Il Presidente Sig. Luigi Merlo

Confindustria Genova
Il Presidente Dr. Giovanni Calvini

CONTRIBUTION TO THE GREEN PAPER
(TEN-T: A POLICY REVIEW – COM(2209) 44 final)

1. General considerations

The basic considerations underlying the need for a revision of the TEN-T policy derive, as a direct consequence, from important events that have characterized the last 13 years after the first European Parliament and Council Decision on TEN-T (1996) was approved. They can be summarized as follows:

- EU enlargement and subsequent network redesign
- Lisbon Agenda on the importance of transport for growth
- Greater public awareness on climate changes
- Consistent increase of road transport, in spite of the efforts to enforce modal shifts of cargo from road to concurrent transport modes.

In addition to these new events, the practical experience made so far and namely the review on progress made in the TEN-T projects developed until now, show that most of the projects were essentially monomodal (high-speed rail lines, airports, river lines). Therefore the statement (point 2 p.4 of the Green Paper) "in the freight transport.....expected growth (...34% between 2005 and 2020) underlines the importance of introducing real co-modal solutions to overcome problems such as congestion, rising CO2 emissions, infrastructure and organizational gaps. The MoS concept....deserves considerably increased attention" can be taken, in our opinion, as the main guideline for the revision.

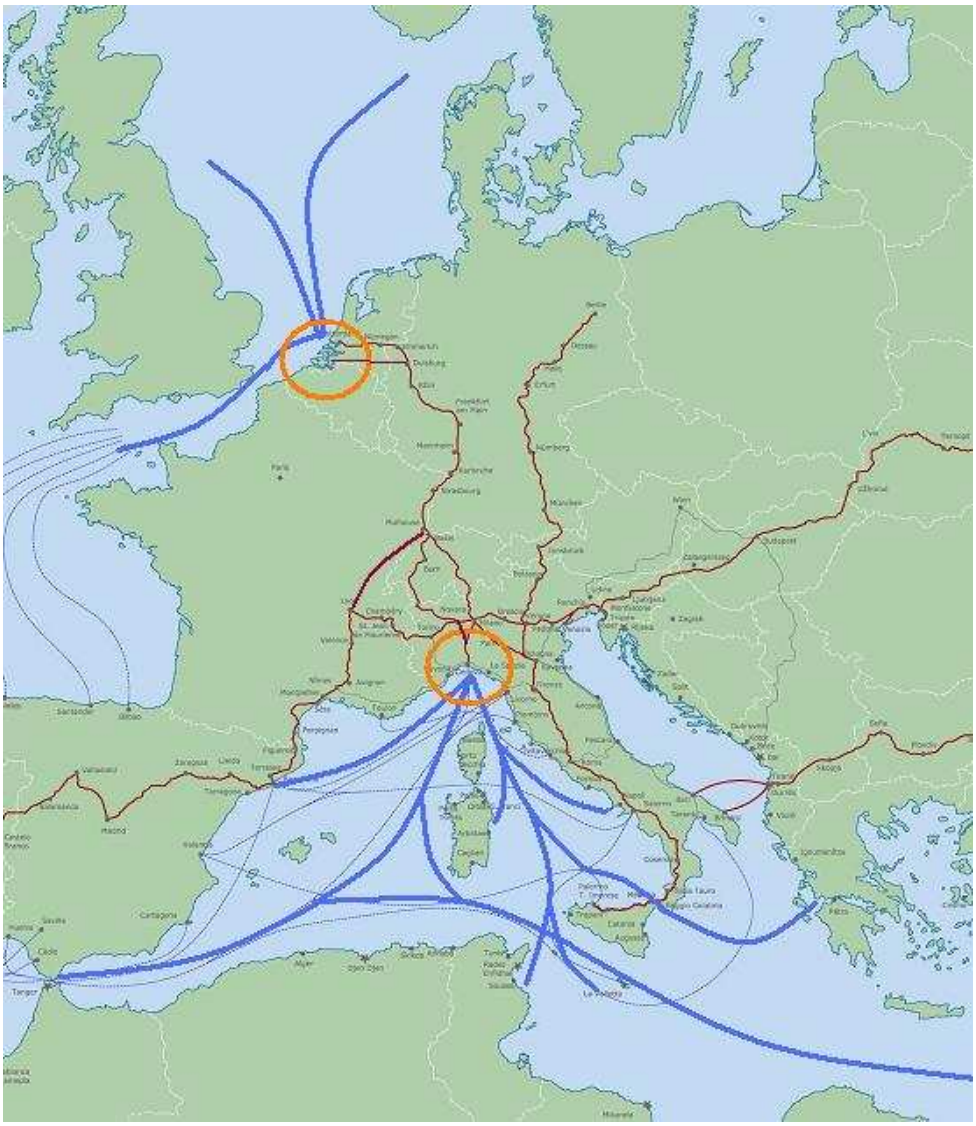
This means, as an example, that whenever a TEN-T corridor (or PP axis) reaches the sea (or an important airport, or a river port), all efforts should be made in order to extend the corridor into the sea (or river or air), especially if the sea can connect to islands or peripheral countries, or to accession countries or third countries with close ties to the EU. An "extended corridor" concept must be developed, overcoming the dominant land-based corridor philosophy of the present TEN-T network.

2. A New Extended Two-seas corridor – *NETcorridor* .

In the current TEN-T framework, Priority Project 24 (PP-24) is commonly known as the two seas corridor, since it connects Rotterdam/Antwerp in the Northern Sea with Genoa in the Mediterranean, crossing the Alpes with two parallel tunnels in the Swiss territory (Loetschberg and Gotthard). This is the only corridor connecting two very important seas (Northern and Mediterranean seas), but until now it has been considered mainly as a corridor that enables Northern Italy, Switzerland, and Southern Germany to be connected more efficiently to the Northern Ports. For this reason the Appennine tunnel ("terzo valico") connecting Milan and Novara to the port of Genoa has been given low priority. The port of Genoa has been considered as the dead-end of the corridor: as a consequence, "terzo valico" has been considered only as a national issue, and was

never given the status of a transnational link in spite of the fact that the port of Genoa, like all international ports, is a transnational frontier.
Presently, the new perspective of enhancing the co-modal features of the corridor on one side, and of grouping more than one corridor into a "core network" on the other side, can make it possible to repropose PP-24 under a completely different viewpoint. We may call it "**the New Extended Two-seas corridor - *NETcorridor***". NET is an acronym, but it implies also the concept of a "network of corridors". Some considerations for supporting this concept:

- PP-24 in the present configuration crosses the Lisbon-Kiev axis (PP-6) in Novara and Milano. This junction will become a very important exchange, connecting the two axes (PP-6 and PP-24) to the port of Genoa, and from there to the Mediterranean Sea. Furthermore PP-6 intersects PP-1 in Verona, 160 km from Milano and in Lyon PP-6 collects traffic coming from the Channel Tunnel. It can be concluded that "terzo valico" (Milano/Novara to Genova) is like the trunk of a tree whose branches extend through Lyon, Novara, Milano and Verona to reach most of the European territory, and whose roots are the Mediterranean sea maritime lines departing from the port of Genova**. "Terzo valico"** is the bottleneck, and therefore becomes the top priority infrastructure for ***NETcorridor.***



- When the port of Genova is mentioned, this is not really a single port, but rather a cluster of ports: these ports are now commercially coordinated under the common label "Ligurian Ports", and they include, besides Genova, also La Spezia and Savona. The cluster can be extended,

going west, to the ports of the French PACA Region (Nice, Toulon and Marseilles). These ports are connected via a coastal rail line, presently undergoing important restructuring programmes to be completed by 2015: also road connections from the port of Genova to the hinterland will be improved shortly (the "gronda" project). All ports run regular MoS lines (more than 180 connections each week), and have good MoS connections to Maghreb countries, and to EU countries. ***NETcorridor*** can find in the Ligurian and French coasts a well structured gate to all important ports, with plenty of services already fully operating in the following three directions:

1. services to EC Mediterranean countries: France (including Corsica), Spain, Malta, Greece, Cyprus and the Italian islands.
2. services to third countries, Northern Africa in particular.
3. furthermore, they host regular deep-sea container lines and feeder lines connecting all major ports in the world.

This constitutes the **southern node** of ***NETcorridor.***

- The same considerations apply to the **northern node** of ***NETcorridor***: Rotterdam and Antwerp are so important and well known, that there is no need to explain how they can connect the NETcorridor through the northern sea to the rest of the world.
- The southern node of ***NETcorridor*** serves an area of intense industrial activity and consumption of goods. The area includes Lombardia plus a cluster of Regions that are coordinating themselves through the Alpes-Mediterranean Euroregion (PACA, Rhone-Alpes, Val d'Aosta, Piemonte, Liguria): they cover an area of 150.000 square km with 26 Million inhabitants. A new **Co-modality Promotion Centre** will be created shortly in the region, in order to attract cargo from road to rail and sea, by developing and operating the proper Galileo-based ICT technologies, such as the ACCESS system developed under Marco Polo, for attracting and informing truckers and freight-forwarders.

For the above-mentioned reasons, ***NETcorridor*** **can represent one of the most qualified examples of the "core-network"** as defined by the Green Paper. Some highlights of this project:

- Flexibility. Sea services, like MoS, are easy to start-up according to the changing needs of the market, and to up-grade whenever required. Furthermore: flexibility for intercontinental traffic can be obtained by using either the Northern node or the Southern node, or both, of ***NETcorridor*** as gates to central Europe, depending on market needs, and alleviating the growing congestion around the Northern ports of Antwerp and Rotterdam. Southern and Northern nodes are the gateways to the outside world: they must be given a special status in terms of investment capability, labour regulations, economic authonomy in a framework of greater uniformity between Northern and Southern ports.
- Integration of ports with the hinterland. Ports and inland terminals should be considered as an integrated logistic region, with efficient connections by means of rail shuttles (the so-called "long port " or "corridor port" concept). An example of good-practice in this respect is the project extending the port of Genova up to Alessandria, where an inland platform is being created by SLALA, a joint undertaking by the cities, the Provinces and the Port Authorities. Other examples are: Spezia - Santo Stefano Magra, Savona - Cairo, besides the well known example of Rotterdam – Duisburg in the Northern node.
- Passenger/cargo capability, as suggested by the Green Paper. The train lines are high-capacity, not necessarily high-speed, for both cargo and passenger trains. Passengers and cargo can be mixed on most MoS lines serving Ligurian and French ports. This is a case where passengers and freight do not necessarily need separate policy actions from the EC, since they can be combined on most transport services.

- Interconnection of central Europe with North African countries, in a perspective of a growing cohesion between the two façades of the Mediterranean sea, both from a commercial and political point of view.
- Integration of the different layers of infrastructure and financial planning. A EU-backed corridor will create a strongly needed unifying force among the different levels of decision (local, regional, national and EC) which otherwise will tend to develop independent plans. Re-orienting all financial efforts (public and private, central and local) is very important for avoiding dispersion and achieving concrete results in a short time: the leadership role of TEN-T planning is very important, especially when the corridor crosses six different countries (and this is the case). Also safety will be improved by a strong coordination among different railway administrations and by adopting common management tools, like ERTMS.

3. Answering the Green Paper questions.

The ***NETcorridor*** approach will be used as a guideline for answering the Green Paper questions (as below).

Q1 Should the Commission's assessment of TEN-T development to date cover any other factors?
A1 *Undoubtedly a stronger stress on co-modality is appropriate. Most present TEN-T projects are essentially mono-modal, and also MoS (PP-21) has been interpreted so far as a way to finance sea lines and port infrastructures rather than co-modality*
Q2 What further arguments are there for or against maintaining the comprehensive network, and how could the respective disadvantages of each approach be overcome?
A2 *The comprehensive network should be maintained, to have a well defined common ground level for any future addition. A core network shall be added on top of it.*
Q3 Would this kind of priority network approach be better than the current priority projects approach? If not, why not and what are the particular strengths of the latter? If so, what (further) benefits could it bring, and how should it be developed?
A3 *A single-layer priority network would not be sufficient to take into account complex issues such as those resulting from the large and complicated European territory, the more so when enlargement is taken into account. This approach could be acceptable perhaps for a single European country, but for the EU, two layers are needed.*
Q4 Would this kind of flexible approach to identifying projects of common interest be appropriate for a policy that, traditionally, largely rests on Member States' individual infrastructure investment decisions? What further advantages and disadvantages could it have, and how could it best be reflected in planning at Community level?
A4 *A list of conceptual pillars which would be very useful for evaluating proposals: flexibility, co-modality, definition of common flanking measures to be uniformly inforced, very useful to create common rules among states (ecobonus, disincentives for trucks on highways, stricter controls on driving hours), cohesion with peripheral states and third countries, logistic efficiency (probably the most important: present trucks travel 26% empty, and the 74% loaded are 57% full: overall efficiency is 38%!), interchangeable land-to-sea loading units (such as EILU).*
Q5 How can the different aspects outlined above be best taken into account within the overall concept of future TEN-T development? What further aspects should be taken into consideration?
A5 *Differing needs of passenger and freight traffic: this is not always true. Many high-capacity train lines are designed for both passengers and cargo. Many MoS services are employing ro-pax ships, where passengers are a bounty to ensure year-round operability and rentability of the line. We would suggest not to preach for division as a general rule. Ports as Europe's connecting points to the world: this is absolutely true. Ports (and airports) should be included into every TEN-T axis*

*as a co-modal structure, and the axis should protrude beyond the port into the sea (see **NETcorridor** as an example). Freight logistics and ITS: see next question.*

Q6 How can ITS, as a part of the TEN-T, enhance the functioning of the transport system? How can investment in Galileo and EGNOS be translated into efficiency gains and optimum balancing of transport demand? How can ITS contribute to the development of a multi-modal TEN-T? How can existing opportunities within the framework of TEN-T funding be strengthened in order to best support the implementation of the ERTMS European deployment plan during the next period of the financial perspectives?

A6 *Freight logistics and ITS: this is again a very important issue. ITS should be offered as a neutral service, non-proprietory, to all transport operators for modal shift of cargo. TEN-T shall dedicate financial resources specifically to this goal, as it was done for river ITS (why not doing the same for land-to-sea co-modality?). EC should consider the option of creating, or selecting through a call for tender, a neutral body for developing and running the service at European or Regional levels. Presently only proprietory services are supplied, which offer only partial co-modal alternatives to road: solutions by competitors are usually not even listed.*

Q7 Do shifting borderlines between infrastructure and vehicles or between infrastructure provision and the way it is used call for the concept of an (infrastructure) project of common interest to be widened? If so, how should this concept be defined?

A7 *Infrastructure provision under the current regulation does not encourage competition in rail services. Regulations and laws requiring a more net separation between infrastructure and service are needed if the creation of a true competition is really wanted.*

Q8 Would this kind of core network be "feasible" at Community level, and what would be its advantages and disadvantages? What methods should be applied for its conception?

A8 *A core-network can, and should, be defined on the basis of the Conceptual pillars outlined in answer* **A4.** *An example of one of the basic corridors that can constitute the core-network was given in paragraph* **2** A New Extended Two-seas corridor – ***NETcorridor***. *Below the core-network, a comprehensive network must be maintained.*

Q9-Q12 No particular comments on these questions.

Q13 Which of these options is the most suitable, and for what reason?

A13 *According to the answers given above, it seems that the definition of a core-network which complements the comprehensive network can add flexibility to the revised TEN-T Programme: option 3 should be preferred. And **NETcorridor** appears to be an ideal example for applying these new concepts in revising the TEN-T Programme after the experience of the last 13 years.*