

European Commission  
Directorate General for Energy and Transport  
TEN-T  
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Reference:

**TEN-T: A policy review; Towards a better integrated trans-European transport network at service of the common transport policy (Brussels 4.2.2009, COM(2009) 44 final)**

We, the undersigned regional authorities, thank the Commission for the possibility to comment on the recent TEN-T policy review of February 4<sup>th</sup> 2009.

We are pleased to notice that the Commission pays attention to the needs of continuous development of the trans-European network (TEN-T), which we also consider being of great importance. Pursuing the same aim, we are at present in a process of creating an overarching railway concept, "The Bothnian Arc", in our region extending from the Bay of Bothnia in the North to the Nordic Triangle railways in the South of Sweden and Finland, and further on to the Rail Baltica. The "Bothnian Arc" provides direct and improved railway links from southern parts of Europe to the ports of the Bay of Bothnia and the Barents Sea. As is well known, the region possesses the most extensive natural resources in Europe. E.g. ore and energy resources have been intensively developed in the past decades through the region. The Arc is also connected to the Northern Axis that gives linkages to the third countries.

Based on the above, we are of the opinion that, firstly, a comprehensive network as a structural option of the TEN-T policy, serves the needs of our region in the best possible way.

Secondly, we find the proposal defining a more focused "geographic pillar" valuable, provided that enough attention is paid to the specific conditions prevailing in Northern Europe. Our region is large and characterised by long distances that hamper the lives of the region's people and businesses alike. Both sides of the Bothnian Bay, that is, sphere of the Arc's immediate influence, is one of the most potential areas in Northern Europe as far as economy is concerned. Thus, the objectives of the TEN-T, the creation of connections to difficult-to-access and peripheral regions and improving social and regional cohesion continue to be important and should be reflected in any new TEN-T definition including a potential "priority network".

Thirdly, horizontal measures in the development of TEN-T transport system could be strengthened. New and cleaner technologies and wider use of intelligent transport systems are very essential elements in the future of transportation. In our view, it would be advisable to include these considerations as parts of the "conceptual pillar", which would make the definition of projects and improvement measures broader than infrastructure investments alone do.

Fourthly, the Commission might find it wise to assist in the setting up of supranational organisations that have adequate mandate for promoting transport development and for assisting project implementation so as to ensure a proper co-ordination of different funding sources.

Sincerely,

ALTTI SEIKKULA  
Chairman  
Finnish Main Railway Working Group  
Representing the nine Regional Councils

PENTTI HÄMÄLÄINEN  
Secretary

