



Towards a better integrated Transeuropean Transport Network at the service of the common transport policy

**ACEA's Response to the Commission's Green Paper
TEN-T: A Policy Review
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1. ACEA, the European Automotive Manufacturers Association, very much **welcomes that the Commission prepares the revision of the TENs Transport Policy**. Indeed, the political, economic and social context has changed since the TEN-T policy was conceived in the 1990s for an EU of 15 Member States. Such evolution justifies a fundamental review of the policy rather than just a review of the priority projects.
2. The automotive industry and its customers rely heavily on a functioning **transport network that provides reliable and efficient mobility to citizens and helps companies conducting business competitively** compared with other regions of the world. From its perspective as a leading industrial sector, automobile manufacturers share the view that the European transport network is increasingly characterized by the persistence of bottlenecks, missing links and lack of interoperability. The **competitiveness of the European economy needs a better transport network** and a new impetus is needed to create this.
3. The Trans-European Network concept is useful in principle as a way of trying to ensure that Europe gets the transport infrastructure that it needs. Some projects prioritized under the TENs concept have been successful. However, the automobile industry shares the **disappointment about the proportion of long identified "priority" projects so far completed**. This constitutes rather poor progress and does not reflect well for the future. If Europe is to succeed in improving its competitiveness then greater efforts will be needed to complete important projects more quickly.

4. ACEA notes that only 3 of the 30 priority transport projects are devoted to road and firmly believes that the **Commission has to avoid addressing TEN-T policy on the basis of “modes of transport” but on the basis of “efficient transport”** and should not base its policy on the assumption that some modes of transport would be, by definition, more environmental friendly than others and should therefore be given preeminence over the others. Establishing lists of priority projects with a disproportionately large share of non-road projects because they are generally perceived as more environmentally friendly than other is therefore the wrong approach and does not help the European Union to provide a sustainable transport system based on social, economic and environmental needs. Contrary to a wide spread belief, modal shift is suitable from an environmental point of view in some very specific cases, but it is neither possible nor suitable in the majority of the traffic flows.
5. In **freight transport** for instance, to a great extent **the environmental performance of one mode against other depends** on the utilization of its maximum capacity, which depends on the volume and the weight of transported goods, the need for loading and unloading, the density of its network, source of energy, energy need loaded compared with unloaded and specific needs with respect to the commodity to be transported. **ACEA therefore does not agree with the assumptions made by some European institutions in that respect¹.**
6. Europe should concentrate on projects that promote the most appropriate transport link. The Commission should **develop a rigorous methodology to identify and select the priority projects** covering all major transport axes that cross several Members States. And projects should be subject to a strict socio-economic evaluation and for their high relevance to transnational traffic flows. All future priority projects therefore need to be subject to rigorous cost/benefit analysis.
7. Europe’s transport infrastructure, especially its road network, is falling behind what is required for a modern economy. This is mainly due to **lack of investment**. This has **contributed to bottlenecks and increased congestion and CO2 emissions**. Spending on road infrastructure has fallen to dangerously low levels and this is one trend that must be reversed. Europe should be funding key transport projects that will not only modernise Europe’s infrastructure, but will also help reducing negative environmental impacts and will create millions of jobs by developing existing, new and smarter infrastructure, especially road. Europe should not be lagging behind other leading economies: **it needs more Community and national funding for key transport projects**. This is

¹ As examples:

- EIB ([European Investment Bank](http://www.eib.org)) financing of the Trans-European Networks, 2009, page 13:

“ *...funding railways, inland waterways and maritime projects will continue to be a priority as these are intrinsically the most promising in terms of reducing greenhouse gas emissions per transport unit. ...*”:
http://www.eib.org/attachments/thematic/tens_2009_en.pdf

- EP ([European Parliament](http://www.europarl.europa.eu)) resolution of 22 April 2009 on the Green Paper on the future TEN-T policy, paragraph 7: “*7. Notes with approval that environmentally friendly forms of transport receive a disproportionately large share of consideration in the list of priority projects; calls on the Commission in this connection to ensure that these proportions are preserved in future when projects are implemented;*”

<http://www.europarl.europa.eu/sides/getDoc.do?type=TA&language=EN&reference=P6-TA-2009-0258>

particularly so in view of the huge contribution that transport, and road in particular, has made and will still be making to the tax revenue of the Member States.

8. The Trans-European road network is almost entirely made up of motorway or similar grade roads. These are the safest roads that Europe has built. These roads are not where the majority of fatalities occur. However, the automotive industry believes that the **financing of TEN-T road projects should be conditioned to the full implementation of the Directive on road infrastructure safety management²** by the Member States concerned.
9. Finally **Trans-European Transport Networks should not be looked at in isolation**. At this time there are several other initiatives at a European level being discussed which have relevance for future networks. Most notably amongst these are the amendment of the Eurovignette and the actual implementation of the directive on interoperability of toll collection systems as well as several ITS initiatives. All of them will also impact the transport networks. Europe does not only need additional investment in the road network but also in its intelligence. ITS applications can contribute to an efficient use of the existing infrastructure. However, they cannot overall replace infrastructure investment. The increasing use of tolls, either through an interoperable electronic collection system or through other means should provide dedicated finance for investment. **This finance from road users should not be in addition to existing taxes but it should be dedicated to the improvements in the road network** that users have the right to expect in return for the € 350 billion they already contribute to government revenue. It should not be used to cross-subsidise poorly performing transport modes which provide only limited alternatives.

About ACEA

The ACEA members are BMW Group, DAF Trucks, Daimler, FIAT Group, Ford of Europe, General Motors Europe, Jaguar Land Rover, MAN Nutzfahrzeuge, Porsche, PSA Peugeot Citroën, Renault, Scania, Toyota Motor Europe, Volkswagen and Volvo.

² OJ L319 of 29.11.2008, page 59

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:319:0059:0067:EN:PDF>