

**Eupave consider that revision of TEN-T is an essential process, since it is necessary to learn from previous actions and accounting new more prominent principles and concepts (such as sustainability or vulnerability), at the same time that economic and political situations have changed to the European Union transformation.**

**For this reason, we want to join European consultation process opened after the edition of the Green Book, answering the asked questions.**

**Q1. Should the Commission's assessment of TEN-T development to date cover any other factors?**

The right assesment of TEN-T development so far involves drafting a report in which the fulfillment of initial goals is analysed. This report should include an ex-ante and an ex-post comparative analysis of deviation not only in network costs but also in its profits. This study aims at avoiding in the future those mistakes that were made in the past.

Additionally, network planning must include a first step in wich a technological survey is carried out in order to evaluate the influence of technological changes on the principles of network planning. Examples of these changes may be the evolution of vehicles propulsion system or technical revolution in construction of underground infrastructures.

**Q2. What further arguments are there for or against maintaining the comprehensive network, and how could the respective disadvantages of each approach be overcome?**

The main advantage of a comprehensive network consists of its adaptability to changes. A priority network lacks of this capacity and it is doomed to become a limited network which would have to be modified before any change. As an example, the construction of a big harbour within a limited network would need the adaption of european networks, whereas a comprehensive network would require no deep change.

Besides, a global network is easily adaptable to the diversity of different countries. Establishing a priority network based on, for example, traffic intensity would mean, in practice, the exclusion of some countries from the TEN-T,

On the other hand, a comprehensive network could lack of real European meaning, it would lead to the creation of missing links and it would hide the indolence of some Estate Members in developing the main infrastructures.

However, there exists an intermediate solution that would permit overcoming most of the problems. This solution consists of a global "labelled" network so that it means different levels of common financing collaboration.

**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?**

From an European point of view, priority networks are more coherent than priority projects. However, in the design of networks, other variables apart from physical characteristics must be considered, such as financing and operating mechanisms and the use or not of a concessional system and, in particular, Private-Public Partnership. Priority of network should be linked to the promotion of private involvement by means of Private-Public Partnership Associations, to the extent that common financing should favour those initiatives that are supported by these associations.

Planning priority networks should take into account additional elements to those considered at the moment, such as:

- Invulnerability to natural disasters.
- Energy-efficiency labelling.
- Contribution to sustainable construction.
- Contribution of PPP systems selected.
- Service quality commitment of infrastructures.
- Characteristics of assesment reports.

**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?**

Conceptual approach is mistaken, since it does not apply principles of competence and efficiency. Present way of proceeding consists of building infrastructures without considering their suitability (mistaken infrastructures) and subsequently it persists in the error, forcing citizens to make use of these infrastructures.

General privatization arises as the solution to this problem. This way, we can make sure that “discriminatory” measures towards some modes of transport are “reasonable”, since otherwise it would unbalance relationships among private companies.

At current situation, when choosing between public and private companies, governments and European Union always opt for public companies (as an example, competence between air transport and high-speed train).

**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?**

Additionally to traditional criteria, in future TEN-T development, it is necessary to establish and define new concepts, such as:

- Access networks and their contribution to TEN-T.
- Legal framework.
- New definition of units, placing less importance to tonnes and increasing the value of freight goods.
- Sustainability of projects and networks.

**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?**

Without any doubt, ITS have remarkable advantages but, in general, they do not replace infrastructures needs.

ITS will promote the creation of new services for new needs, but it is unlikely that they become a solution for current situation.

**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?**

Shifting borderlines may involve widening the concept of project, but definition of new platforms is a complex task to undertake. The creation of a network of centres to control the traffic within the TEN-T could be an appropriate proposal for this case.

**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?**

A core network would demand an independent planning, and its feasibility would be low due, mainly, to national interests. This planning should be based on concepts such as:

- Importance for European Union and its main objectives.
- Contribution to social and territorial integration.
- Economic interest.

- Fight against periphery.
- Contribution to the satisfaction of common users rights.

**Q9. How can the financial needs of TEN-T as a whole—in the short, medium and long term—be established? What form of financing – public or private, Community or national—best suits what aspects of TEN-T development?**

In order to determine financial needs, it is necessary to consider, apart from costs deviations, incomes generated. Estimation errors must be evaluated in both supply and demand.

Pure public financing systems must only be used in those infrastructures that lack completely of private interest.

**Q10. What assistance can be given to Member States to help them fund and deliver projects under their responsibility? Should private sector involvement in infrastructure delivery be further encouraged? If so, how?**

Projects can be advised by private companies (centres of excellence in PPP) in order to make easier private financing or public-private financing.

**Q11. What are the strengths and weaknesses of existing Community financial instruments, and are new ones needed (including "innovative" instruments)? How could the combined use of funds from various Community resources be streamlined to support TEN-T implementation?**

At present, it is essential to distinguish between financing difficulties and economic difficulties and, in this context, mechanisms of collaboration cannot hide the actual value of a project. The objective must not be financing any project, but promoting projects with European value.

**Q12. How could existing non-financial instruments be improved and what new ones might be introduced?**

Different alternatives must be tackled, among them, "Centres of excellence in PPPs" should be considered.

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

From our point of view, we consider that the third option is the most convenient. Therefore, it would be necessary to establish a global network with "labelled" infrastructures, so that this labelling has financial influence on it. By means of this system, political interests (difficult to achieve in a limited network) and interests of European Union will be put together.