

UNTRR's position on

European Commission's draft green paper "TEN-T: A policy review - Towards a better integrated transeuropean transport network at the service of the common transport policy"

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

- a. The demand: the Commission's green paper draft provides that "*The planning of future transport infrastructure is closely linked to demand forecasts - whether at national or EU level*". Though, the Commission uses this lever in order to force the inter-modal shift despite the fact that the time proved it as being unsuccessful, this being also proven by the development of different modes of transport share.
- b. The financing: it can be observed that, despite the fact road transport contributes to the total amount of transport with over 75%, and for 2005-2020 an increase of over 34% is foreseen, during 2007-2013 this mode of transport will benefit of only 2,73% of the total European funds allotted for TEN-T (according to the multi-annual distribution).
- c. The investment's cost efficiency: although one of the TEN-T aims is the economic viability, this draft green paper does not emphasize this approach. The document refers to the investment, up to now, of an amount of 400 billion EURO for this network – with about one third from Community sources – there is no differentiation of the amounts per each mode of transport. At the same time, there is no reference to the share of the railway on the freight and passengers transport market, despite the fact it took advantage of the largest amount of investment.
- d. The innovation and safety: measures have to be taken into account to provide business incentives to the carriers in order to support them and to make them to use the newest techniques in this field. Also using these can assure a more effective use of the existing infrastructure and could lead to the removal of traffic bottlenecks. The safety issue has also to be considered since an unsafe infrastructure leads to an increase in the number of accidents. Moreover, this can be also touched by applying the above mentioned business incentives concerning the innovation.

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 issue is not about the "comprehensive" network – being already proved that such a network is far too ambitious, at least from the financing and construction point of view. The bottom line is that the network planning to be realistic and in accordance to the financial and construction capabilities. Beside this, as far as the Community and national interest projects are concerned a better coordination at Union level should be provided.

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?

Of the draft green paper results that the “comprehensive network” approach is intended to be quit and an approach of a “network based on priority projects” is considered. It seems that this idea emerged since it was noticed that the available instruments were not enough to allow the completion of common interest projects during the time frame foreseen by the guidelines due to the fact that the responsibility for the completion of such a large number of projects – part of the “comprehensive network” – was almost exclusively in charge of the member states, which decisions concerning the investments are mainly governed by national objectives, while there was a different situation in the case of the priority projects which were part of the Community's efforts, both from the financial and coordination point of views.

To that effect, setting up the projects based on the main traffic flows is to be appreciated, but in order to optimize the transport and to improve the intermodal offer the funds have to be allotted for improvement and expansion priority projects concerning the road network.

The green paper also has to include the principle of performance optimization for each mode of transport, as well as that of the possibility to interchange the modes of transport.

As far as the climate change further to the shift of goods transport from roads to the “motorways of the sea” and the allocation of funds according to this issue, we believe that is better to be take into account the social and economic cost and benefits of each project, not only the benefits for the environment, before any decision is taken.

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?

Taking into account the a project of common interest have to solve the problems concerning bottlenecks, lack of links, safety and security we believe that a greater involvement of the Union in setting up/defining these projects, considering transport efficiency and sustainability, is needed.

Moreover, there have to be considered the cost-benefit analysis for each project, as well as its impact at European, regional, national and local level.

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?

- a. The network, whatever network approach is considered (comprehensive or of priority projects), it has to be an users network,
- b. It has to be considered the large share road transport has and will continue to have in the future,

- c. The idea of modal transfer in order to reduce pollution has to be quit - especially since nobody talks about the pollution, even in an indirect way, created by the so called "environment friendly" modes,
- d. The Trans-European Transport network can and should make the road transport more sustainable,
- e. A better cooperation is needed between Member States and between Member States and the Commission in achieving road transport infrastructure, as well as in facilitating this type of transport,
- f. It should be taken into account the need for developing inter-modal transport terminals in order to create efficient logistic chains,
- g. Finally, it has to be taken into account the need of developing, from the beginning of the road project, rest areas for drivers, these leading to an increased traffic safety.

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?

ITS could bring important benefits both to the road transport network development and to road transport themselves. In this respect it is necessary the following to be taken into account:

- a. the development of ITS in the field of road transport at an European level, without discrepancies, and to ensure its interoperability, efficiency, profitability, and viability ITS have to be standardised and harmonized at European level. Putting in place of incompatible ITS at European level, before agreeing upon harmonized standards concerning these applications, may lead to new barriers for the intra-European transports and thus giving birth to a neo-protectionism instrument for the national markets.
- b. the transport operators have to use ITS on a voluntary basis, which means that the authorities do not have to impose the use of these technologies. To reach this aim, considering the costs involved by the implementation of ITS technology for the road transport operators, there would be necessary business incentives to be provided by the authorities in order to make them to use the latest technologies in this field,
- c. the use of ITS should not be limited just to GALILEO but it would be necessary this system to be interoperable with the existing ones to ensure the selection of the most efficient and functional solution.

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?

The limits between infrastructure and vehicle have already started to disappear. It is necessary that through the use of ITS, considering the conditions already listed in Q6, to eliminate to a larger extent the bureaucracy.

At the same time, among the priority projects, the possibility of using longer and larger vehicles should be considered.

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?

The "core" network at the Community level would be feasible just in case the current attitude on modal shift was fully abandoned. This means that the road transports – and its infrastructure – have to be considered on equal grounds, from all points of view, with the rail and maritime transport. Thus, the efforts could concentrate on a slimmer network, made up of projects which were more in depth analyzed from benefits and cost point of view, before starting their execution. At the same time, after their achievement, a post- analyse could be carried out that will be the basis for the selection of future projects.

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?

These can be established through the enhancement of the European approach on project planning and the setting up of a basis to concentrate the Community support – both financial and non-financial.

It is also obvious that the national financing, whatever form of it public or private, will continue to prevail.

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?

Transport taxes and charges have to be earmarked to transport related infrastructure projects and to the development of the transport mode from which these were collected and not to be allocated to the general state budget.

No new taxes and charges should be applied to road transport since the existing ones already cover both the infrastructure and the external costs.

All the other modes of transport should cover their own costs in a similar way.

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?

A better coordination would be necessary among the Commission services in order to avoid losing opportunities and wasting funds.

The use of public-private partnerships is welcomed. In this respect, a better coordinated action of the Commission is necessary.

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

- Involving all the stakeholders in any project development (citizens, authorities, professionals, and business).
- Improving the mission of European network coordinators.
- Coordination with Pan-European Transport Corridors.

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

The option concerning the “core network” combined with the “priority projects” network seems as the most likely to fulfil the interests of the road carriers in respect of bottlenecks elimination and the other issues, mainly infrastructure and facilities, they confront with, but it has to rely on transparency and cost-benefit analysis before any decision is taken on investment and resources allocation.

CONCLUSIONS

UNTRR supports the European Commission's draft green paper “TEN-T: A policy review - Towards a better integrated transeuropean transport network at the service of the common transport policy” with the following comments:

1. when the priority projects are decided upon it has to be taken into account that the network is destined to the users.
2. setting up a core/priority projects network may help to eliminate the delays that were registered until now. For instance, in Romania out of 604 km of motorway estimated at about 2 600 million EURO, and which had to be built until 2009, only 169 km, with a cost of about 530 million EURO were constructed.
3. using the public-private partnership and involving all the stakeholders in the development of transport infrastructure projects, as well as the production of sound cost-benefit analyses would give a better understanding to those affected by the projects and will lead to a more efficient investment for their achievement.
4. The involvement at a larger extent of the Union in setting up/defining these projects taking into account transport efficiency and sustainability would entail a higher stability in selecting and maintaining the projects by the Member States by reducing political aspect which was prevailing in the selection of the initial projects.
5. the amounts collected from road transport taxation have to be earmarked and get back in the infrastructure and facilities designed for this mode of transport and not for the development of other modes.
6. the current existing discrimination among the road transport and the railway, maritime, and inland waterways transport have to be eliminated, at least as far as the pollution, taxation, and financing is concerned.