

European Community Shipowners' Associations



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TRANS EUROPEAN NETWORKS TEN-T – A Policy Review Commission Communication COM (2009) 44 Final of 04.02.09 ECSA Submission

ECSA is the trade Association representing the shipping industry from the European Union and Norway. European shipowners control about 41 % of the world merchant fleet and are active both in intra European transport and international transport as well as in global cross trades between the different countries.

European shipowners are also very active in maritime intermodal transport using the different transport modes with maritime transport as a basis. The importance of the maritime sector on intermodal transport is confirmed by 14 million TEU moves per annum in Europe and 75 million worldwide.

ECSA appreciates that the Commission acknowledges in the Communication of 04.02.09 that good transport connections within Europe and with other parts of the world are essential to maintain its international competitiveness.

It is recognised by now that urgent action is required on improving the European transport network. The present economic crisis underlines this request even more. As far as maritime services are concerned the accent should be on the expansion of port capacity, infrastructure and terminals as well as the improvement of hinterland connections. This will allow a further enhancement of intermodal transport in the context of co-modality.

As mentioned in previous comments to the White Paper on a European transport policy, ECSA very much appreciates the philosophy of shifting transport from congested road transport to alternative modes such as rail, inland waterways and short sea shipping. ECSA is heavily involved in the promotion of short sea shipping services in close co-operation with the EU Institutions. The comments of the European shipping industry are based on a constructive approach of further promoting the use of short sea shipping and intermodal transport in the context of co-modality.

The high number of efficient short sea services that have been established in the last decade are best practice examples of Motorways of the Sea. Also for these services the TEN-T policy should concentrate on better infrastructure and improved hinterland connections. All transport modes and nodal points should constantly improve their efficiency.

Indeed an optimal use and proper upgrading and maintenance of existing infrastructure should also be full part of a TEN-T policy. This should be linked to an ongoing improvement of efficiency. The application of the principles of a European port policy as outlined in the Commission Communication of October 2007 should now become reality.

As main intermodal operator, maritime container transport has contributed very much in creating hinterland rail links and will continue to do so. The liberalisation process in practice of rail transport should be speeded up in this respect.

The full Maritime Cluster has for many years advocated an extension of port capacity and hinterland connections. The TEN-T are the appropriate instrument to support this request.

However, a TEN-T policy should not result in dirigisme but be based on specific needs and should consequently be market driven. In concrete terms for shipping central planning, selecting ports and excluding others, is definitely not the way forward. It should also be realised that concentrating the majority of cargoes through specific selected ports will result even in more congestion, particularly in the hinterland connections.

Nevertheless, there should be a vision behind a TEN-T policy. This should be based on all relevant factors, such as trade flows both within Europe and with other parts of the world, density of traffic, demographic evolution, etc.

Efforts to identify main axes should be enhanced. However, to be able to do this it is necessary to have appropriate information/statistics on cargo flows throughout Europe. The efforts to get such data through EUROSTAT should at long last be successful. It is impossible to establish a proper European Transport Policy without having available the necessary data on cargo flows and on the potential market for each mode.

The success of the existing TEN-T policy has to a large extent been hampered by a lack of financing. Without appropriate financing the purpose of a TEN-T policy will not be fulfilled. The Commission and Member States should take this into account in the further discussions on a TEN-T policy.

The Commission Communication sets out three options for further TEN-T development and outlines the expected benefits and disadvantages to be expected against each of them. Since many cases are individual ones that have to be judged upon on their own merits, a choice between the three options is difficult.

Nevertheless, the preference of ECSA goes to option 3 i.e. a dual layer structure with the comprehensive and core network comprising a – geographically defined – priority network and a conceptual pillar to help integrate the various transport policy and infrastructure aspects.

In such an approach the views expressed above should be taken into account particularly to avoid dirigisme, but instead basing the policy on some key practical elements which are market and reality driven.

To avoid the same hampering for the development of projects as experienced in the present TEN-T, financing of projects should be covered in an appropriate way.