

WWF Hungary's Comments for the Green Paper

WWF is interested in the development of the Ten-T network through the inland navigation projects. The inland navigation is theoretically the most environmental friendly way of the transport but to achieve the infrastructure criteria huge violation on the ecological status of the river must be implemented. On the basis of these experiences WWF has published several studies which most important statements are the following:

WWF supports the development of inland navigation on the Danube as long as projects:

- have clear positive effects on river ecosystems basin-wide and locally;
- are environmentally sustainable;
- respect socio-economic need;
- meet all legal requirements;

Basin-wide sustainable navigation plan

To establish a sustainable navigation system, an overarching 'sustainable' navigation plan for transport along the corridors including intermodal aspects. This plan has to strike a fair balance between ecological, economical and socio-economic needs. The holistic approach has to be applied before individual projects are planned locally. The tool to reach sustainable navigation plans is an international Strategic Environmental Assessment process.

Connect Ten-T guidelines with Water Framework Directive

So far Ten-T guidelines and WFD have been considered separately. In order to establish a sustainable inland navigation plan and real 'win-win', these both need to be combined leading to sustainable navigation. This includes respect of transport projects to the WFD requirements: no deterioration, improvement of ecological status and genuine public participation.

Ecological compensation measures

Sometimes new innovation technologies can compensate to existing hydraulic river construction through restoration and compensation measures for river morphology and ecology. Such measure aims to reactivate natural dynamic processes of the river in a controlled manner. Some examples are reverse engineering of obsolete or superfluous constructions, opening of side channels, removing shore reinforcements and obsolete dams and restoring river sections that are problematic for inland navigation. Such compensation measures should be explored and implemented alongside navigation projects where suitable.

WWF believes that the priority project will be implemented on a way which satisfies the social, economical and ecological demands. Several aspects of the priority project must re-think in order to achieve the most effective developments. Concerning the 'Green Paper' document WWF has these questions and comments:

How do the priority projects meet with the nature conservation directives?

Is it possible to harmonize the goal of the directives and the goal of the TEN-T project?

How big amount must be invested for developing the transport corridor?

How big amount must be invested for maintaining the transport corridor?

How developed the connecting infrastructure of the priority project? Does the priority project have multimodal connections?

How big will be the increase of the transported goods after the transport network will be developed?

What effects of the priority project will have on the ecological status of the transport corridor?

Does the priority project satisfy the socio-economic demands along the Danube?

Questions for the Green Paper document:

Point 3.2 on page 14 and question number 10 on page 15.

„Implementation of TEN-T so far has been marked by enormous cost increases.”

These increases will be the same in the future. Its tendency shows that the proposed budget is too weak to implement all the transport network. The priority projects will not be cheaper in the future. After that it is clear that much more detailed cost-efficiency estimations must be made concerning all the projects. Three questions must be answered all the time: how big investments need to be done for developing the corridor? How big are the damaging effects on the ecology of the development of the network? How detailed is the calculation of the external costs? Not only the European added value need to be calculated, but the external costs, the costs of the ecological services which will be destroyed because of the developing of the transport network. What method will be estimated the value of the ecological services? The Tent-T developments have benefits and costs for the EU and for the countries themselves. The cost-beneficiary cost must be calculated from the aspects of the countries and from the aspect of the EU.