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**European Commission
DG TREN
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Consultation on the Green Paper on the Trans European Network

The Danish Transport and Logistics Association (DTL), representing the Danish transport sector for operators by road and by rail, will not comment on all elements included in the Commission's Green Paper, but will only focus on the elements which are important to the professional users of the infrastructure.

The Commission rightly points to infrastructure as the key element in transport policy. We are pleased to note that the Commission recognizes the need for both a better use of the existing infrastructure and for the establishment of a new infrastructure.

For various reasons, the transport systems today suffer from an almost acute lack of capacity. Construction projects may improve this situation, but such projects are long term solutions which will not increase the capacity in the short term, whereas the introduction of such initiatives as the European Modular Concept, adjustments of weight limits and adjustment of driving bans and restrictions in and outside urban areas may have a quick positive effect.

As in the case of sustainability, it is necessary to take a broad approach to the question of capacity in general and to assess thoroughly which factors determine the limitations in capacity – legislation, safety, social conditions, infrastructure etc – to reach the right solutions which, at the same time, will fulfil all political goals.

Due to the large number of requirements to new infrastructure projects and the limited means available, it is important that politicians acquire a comprehensive as well as technical basis before any decisions are made. Therefore DTL welcomes the Commission's consultation on the TEN-T programme. We believe that international freight transport should be made more effective, as this will contribute to strengthening and develop the EU transport industry and the competitiveness of the European companies. A TEN-T programme built on efficient and safe transport corridors is a step in the right direction.

Q1 Should the assessment of the TEN-T development to date cover any other factors

DTL would in particular point out two factors which in our opinion are very important when assessing the efforts by EU with regard to infrastructure. One of the factors is bottlenecks. The Commission has launched an initiative to combat bottlenecks, which has underlined the difficulties faced by the EU when contributing to the solutions of the bottleneck problems. Nevertheless, a bottleneck in one place may limit the total capacity in large parts of the infrastructure system within the EU, and therefore, the focus should still be aimed at solving the bottleneck problems in the entire system. The other factor concerns a more direct focus on solving the concrete problems within the EU infrastructure, rather than pursuing the policy of transferring freight between the modes of transport. It is not possible to develop or strengthen transport by rail or by sea by deteriorating or impeding the conditions of freight transport by road. 85% of road transport distances are distances below 150 km – in which case transport by rail or by sea is not considered an alternative anyway.

Q2, Q3 priority network or priority projects

In the Commission's Green Paper it is mentioned that the existing TEN-T priority projects can evolve towards priority networks which contribute to a better integration of ports and other network entry points in the existing transport corridors. At the present time, we see large problems in connection with freight transport to and from the European ports, since an effective use of the shipping trade depends on the availability of good access roads to and from the ports to ensure the onwards distribution of the goods. The EU should play a more prominent role in ensuring international transport corridors and transport chains. DTL is positive towards a multimodal TEN-T priority network to make sure that the goods are reaching their destination as fast as possible.

However, this priority network must take the geographical conditions and the regional variety within the EU into account, and continue to focus on the accessibility of all regions to the EU. In this way, connection points such as inter-modal terminals, ports, but also transport centres etc., are more crucial than ever in securing the free transport of goods.

Q4, Q5, Q6 “conceptual pillar” ITS

In view of the experience with TEN-T during the last 10-15 years, it seems reasonable to focus on the areas where EU has been able to make a difference. There are specific areas which require extensive efforts in research and development as well as joint European efforts - ERTMS is one example, Intelligent Transport Systems are another example. Therefore, it seems that the EU is able to contribute with measures focusing on a better use of the existing infrastructure (as it has been and is being constructed by the member states), a common technological development and an implementation of joint EU solutions rather than 27 separate national solutions in areas such as road pricing technology.

At the same time, however, DTL would like to express regret that the chapter on page 11 on “freight logistics” is a listing of desired results rather than an attempt to reach a practical solution to the challenges to freight transport and logistics within the EU. As an example, the context envisaged by the Commission between e.g. parking areas and the development of TEN-T is not clear to us. Would the Commission be willing to use TEN-T means to establish more parking areas within the EU? If so, this should be stated more clearly in the text, and financially, this type of “small projects” should be more visible in the allocation of means.

DTL finds it important that ITS is integrated into the Commission’s TEN-T policy, since ITS systems contribute to a free flow of traffic and will ensure that the existing infrastructure is used in the best possible way. This ITS system can be integrated into the “conceptual pillar” which, according to the Commission, could contribute to integrating the various transport political measures into the main TEN-T policy.

Q7 Innovation

If the goal is to secure the future EU policy for TEN-T, it would be reasonable to acknowledge already now that e.g. ITS is not only a question of infrastructure, but also a question of interplay between vehicles and infrastructure. The Commission’s reference to new types of energy for vehicles offers the same challenge. In both cases, the TEN-T policy could turn out to be an effective and useful instrument.

Therefore, from our side we do not wish to specifically point out any of the three solutions for the Commission’s further work, but we are in favour of an overall priority network supplemented by the “conceptual pillar” which can support the policy in the area.

Best regards

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