

Towards a Better Integrated Trans-European Transport Network at the Service of the Common Transport Policy

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Country of residence	Belgium
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TEN-T components/major infrastructure most involved with (you can choose more than one)	High-Speed Rail Conventional Rail Co-modal
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Name of your organisation	UNIFE - the European Rail Industry
Register ID of your organisation	9624415524-28
Type of involvement	Industry

Green Paper Questionnaire	
Q01.- Should the Commission's assessment of TEN-T development to date cover any other factors?	UNIFE globally agrees with the Commission's assessment. Whilst the TEN-T policy has resulted in some successes, it has also suffered from a lack of a truly "European" approach and a clear focus on key projects of European interests. However, we however strongly believe that scarce resources made available for the TEN-T largely explain why a number of priority projects are not fully completed to date.
Q02.- Should the comprehensive network be maintained or abandoned, and what advantages and disadvantages would either approach involve? Could the respective disadvantages be overcome, and if so by what means?	YES - the comprehensive network should be maintained

<p>Please justify your choice by answering the sub-questions of Q02 as comprehensive as possible</p>	<p>UNIFE is strongly in favour of maintaining the current “comprehensive” TEN-T network approach, which has already brought significant advantages in terms of interoperability and harmonization in the railway sector. We therefore strongly reject what is defined as “option B” in the European Commission’s Green Paper. Indeed, the existence of a TEN-T comprehensive network is an indispensable tool for policies affecting the railway sector. To date the Technical Specifications for Interoperability (TSIs), which are the cornerstone of technical harmonisation for railway operations, apply directly to the TEN-T whilst national networks not being part of the TEN-T are exempted. A large number of EU regulations in the field of transport also have a similar application, such as the Eurovignette Directive which is currently under review. To enhance interoperability and strengthen the competitiveness of European railways, UNIFE strongly believe that the TEN-T network should be at least maintained, if not expanded. This does not prevent the European Union to concentrate funding on</p>
<p>Please allocate the advantages as described above to the following categories:</p>	<p>Reference basis for structural policy objectives Basis for a broad range of transport policy objectives (Help: rail interoperability, road safety etc.)</p>
<p>Please allocate the disadvantages, as described above, to the following categories:</p>	<p>Community instruments are insufficient to allow full network implementation</p>
<p>Q03.- Would a priority network approach be better than the current priority projects’ approach? What would be the advantages and disadvantages of either approach, and how should it be developed?</p>	<p>YES - The priority network approach would be better than a priority projects approach</p>
<p>Please justify your choice by answering the sub-questions of Q03 as comprehensive as possible</p>	<p>UNIFE agrees with the European Commission’s statement that the current priority network approach fails to take into account “network effects”. However, the very reason behind the creation of Priority Projects was the need to concentrate funding on specific corridors/lines of importance. A future “Priority Network” should not break this momentum and be limited in size to ensure that the selected projects are actually completed. The creation of a limited number of “mega-corridors” part of a “Priority Network” seems in this regards to offer promising opportunities. The success of a possible “network approach” will greatly depend on the criteria which are retained to develop this network. At this stage, the Commission Green Paper does not elaborate sufficiently on such an approach for UNIFE to fully back this possibility. For instance, UNIFE sees a clear advantage at imposing binding objectives on a “priority network”, which would be stricter than the one imposed on the comprehensive TEN-T network. The implementation of the European Rail Traffic Management System (ERTMS) could be imposed on rail</p>
<p>Please allocate the arguments described above to the following categories:
 - Advantages of priority network approach (compared to priority projects approach)</p>	<p>Better focussed projects of common interest Possibility for coverage of nodes and inter-modal connections</p>

Disadvantages of priority network approach (compared to priority projects approach)	May become too large in scope to ensure sufficient Community funding; thus not much change compared to comprehensive network approach
Elements that should be taken into account in the development of a priority network approach (planning method)	Traffic flows Interoperability and infrastructure standards Environmental protection / climate change
Q04. - Would the flexible approach to identifying projects of common interest, as proposed with the "conceptual pillar", 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?	YES - a flexible approach would be appropriate
Please justify your choice by answering the sub-questions of Q04 as comprehensive as possible	UNIFE understands that the European Commission would like to add, through a "conceptual pillar", a degree of flexibility to the "priority network" approach described in the Green Paper. Whilst such an idea may be attractive, its effectiveness largely depends on the criteria which are retained to define "projects of common interests". For instance, the need to promote modal shift or new technologies could offer some interesting opportunities. The content of possible policy measures should respond to the same criteria as the ones set to define the priority network, to ensure consistency in the overall TEN-T policy., i.e. modal shift, focus on interoperability, alleviating bottlenecks, etc.
Please allocate the advantages, as described above, to the following categories:	Allows to incorporate into TEN-T infrastructure-relevant aspects of a wide range of common transport policy measures on a "rolling basis" Allows to promote measures that stimulate efficient infrastructure use along TEN-T axes through several Member States or at Europe-wide scale (e.g. measures that may involve infrastructure works of smaller scope and are not reflected in major projects' maps; may cover actions like Green corridors or rail freight corridors; ITS applications)
Please allocate the disadvantages, as described above, to the following categories:	Entails uncertainties regarding the specific definition of projects of common interest (consequently uncertainties in terms of cost, needs and possibilities for Community support)
How could the "conceptual pillar" be best reflected in planning at Community level?	Through links to relevant Community legislation

<p>Q05.- How can future challenges in the sectors of waterborne and air transport (especially ports, inland waterways and airports) as well as of freight logistics be best taken into account within the overall concept of the future TEN-T development? Do different requirements for freight and passenger transport require different treatment in the TEN-T policy? What further aspects relating to different transport sectors / common transport policy issues should be given attention?</p>	<p>UNIFE considers that the TEN-T policy may be a useful tool to adapt the whole TEN-T network to rail freight. In this regards, it should be noted that other policy measures are crucial to allow for the development of rail freight: - UNIFE is in favour of the Commission's proposal on Rail Freight Corridors, which contains a number of appropriate measures to boost rail freight. Please see http://www.unife.org/uploads/EIM-UNIFE_PositionPaper_Freight_Corridors_Regulation_-_February_2009.pdf - UNIFE strongly supports the revision of the Eurovignette Directive on the inclusion of external costs as a key tool to level the playing field between different transport modes; - We are strongly opposed to allowing mega-trucks to circulate in the EU. This would produce a "modal re-shift" from rail back to road transport and would also crucially force the Member States to review their infrastructure investments, as these investments will need to be focused on upgrading roads to be adapted to these new vehicles. For more information please see http://www.unife.org/uploads/megatrucks_2008_final.pdf</p>
<p>Q06.- How can Intelligent Transport Systems in all modes, 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?</p>	<p>UNIFE is of the opinion that intelligent technologies offer a strong potential, both to improve the competitiveness of rail transport and interoperability (deployment of ERTMS, TAF and TAP) and multimodal transport at the same time (harmonization of rail/road ITS). As regards ERTMS, UNIFE strongly believes that EU funding as a critical role to play in ensuring the deployment of this technology along the European railway network. As the full benefits of ERTMS are realised only when a significant number of neighbouring countries have made the necessary investments to upgrade their network, EU funding is pivotal in increasing the pace of ERTMS deployment along the European railway network. In this regard, the EU funding provided so far has been largely insufficient - EUR 260m were granted during the previous ERTMS funding call in May 2007, while requests for funding amounted to EUR 1.5bn for the same period. An additional call for funding of EUR 240m has been launched in March 2009, but UNIFE believes this will fail to meet the existing demand for this technology. ERTMS being "typically" a European</p>
<p>Q07.- 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?</p>	<p>No opinion</p>
<p>Q08.- Would a core network (bringing together a priority network approach as referred to in Q3 and a conceptual pillar as referred to in Q4) be "feasible" at Community level, and what would be its advantages and disadvantages? What methods should be applied for its conception?</p>	<p>YES - a core network approach would be feasible.</p>
<p>Please justify your choice by answering the sub-questions of Q08 as comprehensive as possible</p>	<p>Given the above, UNIFE considers the creation of a "core network" to be useful and feasible. However, such core network should - again - correspond to clear political priorities, in particular in terms of climate change and modal shift.</p>

<p>To which categories would you allocate the main advantages?</p>	<p>Strengthening the European planning approach Integrating transport infrastructure and transport policy developments in the best possible way</p>
<p>To which categories would you allocate possible disadvantages?</p>	<p>High degree of complexity and diversity of projects involved, requiring a too broad range of means for implementation Too many network development priorities</p>
<p>What basis could be used for its conception?</p>	
<p>Which are the three aspects that need to be given highest priority in the core network development method?</p>	<p>Climate change and other environmental objectives Common transport policy needs Member States' infrastructure master plans</p>
<p>Q09.01- How can the financial needs of TEN-T as a whole - in the short, medium and long term - be established?</p>	<p>To date, the financial instruments provided by the EU and the Member States proved to be largely insufficient. According to the European Commission, the total cost for the completion of the TEN-T network would amount to EUR 900bn, with a remaining EUR 500bn to be invested by 2020. As far as the Priority Projects are concerned, their cost would amount to 400 billion Euros, with an estimated EUR 270bn still to be spent. UNIFE believes that the best way to establish the financial needs of the TEN-T is to conduct an in-depth study of the needs.</p>
<p>Q09.02.- What form of financing - public or private, Community or national - best suits what aspects of TEN-T development?</p>	<p>The development of the TEN-T network requires huge financing. To cover the needs, all possible resources should be combined: - TEN-T budget As the TEN-T budget has proven to be far too insufficient, it should be significantly increased in the next financial perspectives in order to provide a clear incentive to Member States to launch major rail infrastructure projects. As a truly "European financial resource", the TEN-T budget should continue to be focused on the greenest and safest transport mode: rail transport. To this end, the criteria set for the funding of the "priority network" foreseen by the Commission should be strictly targeted at rail transport. - ERDF and Cohesion Fund UNIFE believes that they should be better targeted at environmentally-friendly transport modes as a matter of priority. - EIB loans and instruments supporting public-private partnerships Trans-European networks are one of the 6 priority objectives of the European Investment Bank. In 2007, the EIB financed EUR 8.1bn for TEN-T projects and its objective for the period 2004-2013 is EUR 75bn. EIB loa</p>

<p>Q10.01- What assistance can be given to Member States to help them fund and deliver projects under their responsibility?</p>	<p>So far, the main element of European coordination has been the appointment of Coordinators on certain Priority Projects. Whilst this has proved to be useful, UNIFE believes this approach could be strengthened. UNIFE recommends that European coordinators are appointed for each priority project and beyond, to all trans-national lines to be upgraded, modernised or built. In particular, this kind of coordination should aim at completing in a harmonised way (technically and time-wise) projects on both sides of the borders. A "corridor approach", as it already exists with ERTMS corridors, brings a significant added value by gathering relevant stakeholders in a dedicated structure - sometimes taking the form of a European Economic Interest Grouping (EEIG). Such structures greatly help to coordinate investments, but also identify obstacles and bottlenecks on a given corridors. The Commission should envisage making a better use of a "corridor approach" to improve the completion of the TEN-T network. This measure could be used in conjunction with the appointment of Europe</p>
<p>Q10.02.- Should private sector involvement in infrastructure delivery be further encouraged? If so, how?</p>	<p>Despite the economic and financial crisis, private sector investments in infrastructure are necessary considering huge financing needed to implement the TEN-T network. The instruments created by the EIB are useful in this regard and they should be reinforced. The LGTT instruments created in 2007 as well as the European PPP Expertise Advisory Centre can facilitate the involvement of private investors in TEN-T infrastructure. The EIB should reinforce the instruments to make sure that private actors will continue to invest in TEN-T projects.</p>
<p>Q11.01- What are the strengths and weaknesses of existing Community financial instruments used for TEN-T? (TEN-T budget, Cohesion Fund, ERDF, EIB loans)?</p>	<p>Although the TEN-T budget is a powerful instrument to translate political priorities into infrastructure projects, it cannot cover the needs. Very few priority projects have been completed so far and the resources allocated to the TEN-T budget (EUR 8 bn for 2007-2013) are far from being able to cover the financial needs. The total amount requested for TEN-T priority projects for the multi-annual programme 2007-2013 was EUR 11.5bn for a total of 30 priority projects. On the other hand, the available budget, excluding Galileo, is about EUR 5.1bn. Unfortunately, the Member States do not compensate for this lack of financing at the EU level. The 2006 Mid-Term Review of the White Paper on Transport noted that the level of investment in transport infrastructure has fallen in all EU Member States (except Spain) to less than 1% of GDP. When looking at the other financing instruments, the main issue is that they do not support enough the TEN-T modal priority to rail transport. This priority is obviously visible in the selection of the 30 priority projects, since 22 of them a</p>
<p>Q11.02.- Is there a need for new financial instruments (including "innovative" instruments)?</p>	<p>YES</p>

Please explain

The EU and the Member States should take benefit from two recent initiatives to grant more money to the implementation of TEN-T projects: - Resources from the EU Emissions trading scheme As provided for in the compromise between the Council and the Parliament on the revised scheme, "at least 50% of the revenues generated from the auctioning of allowances (...) or the equivalent in value of these revenues, should be used for one or more of the following: (...)to encourage a shift to low emission and public forms of transport". The European Commission should take action in order to convince the EU Member States that a significant share of these 50% should be invested in TEN-T projects. - Resources from the Eurovignette The agreement reached within the European Parliament regarding the revision of the Eurovignette directive foresees that "as from 2011, at least 15% of the revenues generated by external costs and infrastructure charges in each Member State shall be dedicated to financially supporting TEN-T projects in order to increase transport sustainability. This perce

Q12.01.- How could existing non-financial instruments be improved?

So far, the main element of European coordination has been the appointment of Coordinators on certain Priority Projects. Whilst this has proved to be useful, UNIFE believes this approach could be strengthened. UNIFE recommends that European coordinators are appointed for each priority project and beyond, to all trans-national lines to be upgraded, modernised or built. In particular, this kind of coordination should aim at completing in a harmonised way (technically and time-wise) projects on both sides of the borders. Besides coordination, technical assistance is of great help when preparing and implementing rail infrastructure projects. In this regard, UNIFE would like to underline its support to the JASPERS initiative.

Q12.02.- Which new non-financial instruments should be introduced, for what reason?

A "corridor approach", as it already exists with ERTMS corridors, brings a significant added value by gathering relevant stakeholders in a dedicated structure - sometimes taking the form of a European Economic Interest Grouping (EEIG). Such structures greatly help to coordinate investments, but also identify obstacles and bottlenecks on a given corridors. The Commission should envisage making a better use of a "corridor approach" to improve the completion of the TEN-T network. This measure could be used in conjunction with the appointment of European coordinators. UNIFE also believes that setting mandatory deadlines for projects' completion would be helpful to force the various Member States authorities to effectively cooperate. EU funding could be conditional to the completion of a project by an agreed date. However, experience - including that gathered on the ERTMS corridors - show that appropriate funding still plays a paramount role to actually complete cross-border projects.

Please classify your proposal above:

Corridor coordination
Setting of investment targets

Q13.- Which of the options for developing the TEN-T is the most suitable, and for what reason?	Option C: Dual layer: comprehensive network and "core network"
Please justify	UNIFE considers that "option C" is the most appropriate. As explained above, we reject "option B" as we are of the strong opinion that the comprehensive TEN-T network should be maintained, whilst "option A" would consist in maintaining the Status Quo, which is judged inappropriate by the European Commission and many stakeholders. Hence "option C" appears as the most promising approach for the future of the TEN-T.
Q14.- Would you like to make any further comment or proposal?	For more details, please read the UNIFE Position Paper on the TEN-T Green Paper that has been sent to the European Commission and is available on the UNIFE website www.unife.org