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Cefic response to the European Commission Green Paper 'TEN-T: A Policy Review' - Towards a better integrated Transeuropean transport network at the service of the common transport policy

On 4 February 2009, the European Commission published the Green Paper 'TEN-T: a policy review – Towards a better integrated Transeuropean transport network at the service of the common transport policy'.

Cefic welcomes the TEN-T policy review and believes that an efficient, complete and interoperable transport system is of utmost importance for the competitiveness of the European industry.

The TEN-T policy has produced some important results across Europe. Without the financial, political and organisational support from the TEN-T programme, a number of important projects would not have been materialised. However, there are a number of obstacles that have been hampering the effectiveness of the TEN-T. These include the lack of investments, weak planning and technical inconsistency.

Cefic therefore supports a fundamental review of the TEN-T policy. A better integrated and fully implemented TEN-T should provide the transport infrastructure necessary for making Europe the most competitive region in the world in line with the Lisbon Agenda. It should improve transport efficiency and result in a reduction of the emissions and carbon footprint of transport. Furthermore, in the current economic climate, an increase and acceleration of the investments in TEN-T should form a key element in supporting the recovery of the European economy as investments in infrastructure represent one of the important levers to recover economic growth.

Cefic fully supports the position of BusinessEurope on the general questions that are raised in the Green Paper on the TEN-T Policy Review.

In addition Cefic would like to highlight a number of **specific issues that are of particular importance for the European chemical industry**. These are also reflected in the Report of the High Level Group of the European Commission for the Competitiveness of the European Chemicals Industry, issued in February 2009.

- The high integration of the European chemicals industry along the product value chain is one of its main competitive advantages compared to other regions. The majority of the 300 European production sites are located in 30 chemical clusters. The availability of **efficient infrastructure connecting these chemical clusters with each other and with sea ports is of vital importance**.

However, in quite a number of cases the interconnection between the chemical clusters is insufficient and more investment in infrastructure is needed, as was highlighted in the recommendations of the EC High Level Group. In the review of the TEN-T policy this recommendation should be taken into account. Cefic therefore urges the European Commission to include these chemical cluster connections in the Priority Network. For the success of the chemical clusters it is crucial that there is a good infrastructure connection between clusters and with sea ports.

- Long distance transport is the rule in the chemical sector, with specialized chemical companies often supplying the whole European market. Cefic believes that all transport modes have their role to play and should be seen as complementary to each other. Cefic therefore fully supports the principle of co-modality.

There is however a compelling need for a European policy for an integrated transport infrastructure system that allows a **seamless connectivity between all transport modes** on a pan-European level. In order to make this possible, more investment is needed to close the gaps in the interconnectivity of the different transport modes. There is a shortage of intermodal terminal capacity in ports and inland hubs and there are not sufficient connections between ports and their hinterland. Therefore the revised TEN-T policy should include the construction of new **intermodal infrastructure** including intermodal terminals, based on the true economical viability of the projects. The intermodal transport systems should also be harmonized across Europe. In addition the procedures to obtain environmental permits for intermodal terminals should be simplified.

- Cefic is advocating an **increase at European level of the maximum authorized vehicle weights** from 40 to 44 tonnes for road transport and from 44 to 50 tonnes for intermodal transport, in the context of a possible revision of the European Directive Directive 96/53/EC which is under discussion at this moment. Such an increase of the authorized vehicle weights would have important advantages such as a reduction of the number of freight journeys and the congestion of infrastructure. This would also result in less fuel consumption and less CO₂ and other emissions. Last but not least it would significantly decrease transport costs and therefore improve the competitiveness of the European industry.

In order to allow such an increase in vehicle weights, adaptations to the road and intermodal infrastructure are necessary in certain areas. The review of the TEN-T Policy should take this important aspect into account.

- The promotion and maintenance of **high safety and environmental standards in transport** is an absolute priority for the chemical industry, as part of its Responsible Care programme. Cefic has taken several initiatives to further improve the safety and environmental performance of chemical transport operations such as the development of assessment schemes for carriers (SQAS), Behaviour-Based Safety in driving (BBS) and other Best Practices.

Cefic believes that a further improvement of the transport safety and environmental performance should be a key element of the European policy for investment in transport infrastructure.