



CONFÉRENCE DES RÉGIONS PÉRIPHÉRIQUES MARITIMES D'EUROPE
CONFERENCE OF PERIPHERAL MARITIME REGIONS OF EUROPE

6, rue Saint-Martin - 35700 RENNES (F)
Tél.: + 33 (0)2 99 35 40 50 - Fax: + 33 (0)2 99 35 09 19
e.mail : secretariat@crpm.org - web : www.crpm.org

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RESPONSE FROM THE CPMR GENERAL SECRETARIAT

TEN-T GREEN PAPER ONLINE QUESTIONNAIRE

"TOWARDS A BETTER INTEGRATED TRANS-EUROPEAN TRANSPORT NETWORK AT THE SERVICE OF THE COMMON TRANSPORT POLICY"

Introductory remark

This paper is a technical response to the DG TREN online questionnaire on the TEN-T review. The CPMR positions on the policy areas addressed by the Green Paper shall be the subject of a political document, after adoption by the CPMR executive bodies.

QUESTION 1: Should the Commission's assessment of TEN-T development to date cover any other factors?

RESPONSE: YES

The very long term international perspective: economy and geopolitics.

The evolution of EU membership (some areas of Europe have completely changed but not all), of **EU neighbours** (EU neighbouring countries have evolved and changed, including growing importance of relationships with the Mediterranean area, especially Africa and with the Baltic area, particularly EU-Russia relations), and of **global trade flows** (container ports etc).

The sociological background: movements in societies in favour of more sustainable mobility. Without aiming at going back to autarchy, these trends ask the question of the sustainability of the ever growing flow of goods, at a higher pace than economic growth.

The relationship between TEN-T revision and the different scenarios of territorial development in Europe is at least underdeveloped in the Green Paper - in the same range of issues, connections between TEN-T and ESPON.

The EU decision-making process: who should decide, and in particular as far as the CPMR is concerned, how the Regions can be involved, not only for co-financing, but also in the decisions.

The assessment should also cover **the lack of consistency and linkages with other Commission policies and programmes.**

QUESTION 2: 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?

RESPONSE: YES – the comprehensive network should be maintained.

JUSTIFICATION:

The comprehensive network should be maintained, as a framework for showing that a "European network" actually exists, that a comprehensive network provides the opportunity to demonstrate the European Added Value of the TEN-T, as a reference for citizens, public authorities, businesses, and for all EU policies and instruments related to transport, infrastructures and services.

The comprehensive network **must provide a visibility for all Regions** on the maps, by outlining the important transport corridors in a European context. Development of the comprehensive network should not necessarily be linked to the availability of funding.

However, this 2 level network should not lead to removing/withdrawing resources. The wider approach is interesting, bringing a better European vision, but must integrate **criteria to identify priority projects, including their contribution to the Comprehensive Network.**

ADVANTAGES:

- Important for access function, territorial cohesion and links to third countries;
- Reference basis for structural policy objectives;
- Basis for a broad range of transport policy objectives (Help: rail interoperability, road safety etc);
- Basis for identification of projects of common interest;
- Broad reflection of national infrastructure planning.

QUESTION 3: 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?

Elements that should be taken into account in the development of a priority network approach (planning method)

RESPONSE: YES – The priority network approach would be better than a priority projects approach.

JUSTIFICATION:

The priority projects approach is lacking an overall, long-term vision. It leads to a situation where the European network is just an addition of national priorities, and it goes against a truly territorial approach. The priority projects are based on national budget considerations, and not on territorial and sustainable criteria: accessibility; needs to connect one periphery to another; priority to waterborne and rail transports are not taken into account.

A priority network will give a more pan-European orientation to the TEN-T than the current collection of priority projects. The priority network will also assist with linkages to neighbouring countries, as it will clearly demonstrate the "corridors" which the Commission feel are important for the efficient movement of freight, and people, and this will assist in the identification of "entry" points to the priority network.

The CPMR agrees with the draft report of the EP Committee on Transport and Tourism (2008/2218(INI) of 5.1.2009) which calls on the Commission and Member States "to integrate green corridors, rail freight networks, Trans-European Rail Freight Network (TERFN), European Rail Traffic Management System (ERTMS) corridors, maritime "highways", such as short sea shipping, existing waterways with ample spare capacity, into an intermodal TEN-T concept, based on planned actions in favour of more environmentally friendly, less oil consuming and safer modes".

The Commission should elaborate on methods and criteria for how the current priority projects can best be integrated in a future priority network on the basis of the "elements" listed below.

Very importantly, TEN-T must facilitate, by means of a priority network, the connections with regional networks.

ADVANTAGES OF PRIORITY NETWORK APPROACH (COMPARED TO PRIORITY PROJECTS APPROACH):

- More rational planning approach at European level, including the possibility for coverage of network benefits;
- Better focused projects of common interest;
- Possibility for coverage of all modes;

- Coherence between instruments (financial and other) necessary for full network implementation and planning objectives as challenge for future TEN-T policy;
- Possibility for coverage of nodes and inter-modal connections;
- Enhanced possibilities for "environmental optimisation";
- Possibility of better reflection of major European traffic flows and cohesion objectives;
- The major corridors must be mutually interconnected as well as being linked to secondary or regional networks which make a major contribution to the effectiveness of EU intervention.

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;
- Social, economic and geographical cohesion, incl. a "territorial coverage criteria", defining maximum distance / travel time from any location in the EU to the nearest part of the priority network (f.ex that N% of the population should be able to reach the nearest entry point of the network within N minutes);
- Minimum capacity requirements;
- Environmental protection/climate change;
- Safety and security concerns;
- Modal "earmarking", whereby priority is given to investments in sustainable modes like rail, SSS and Inland Waterways, as well as investments in auxiliary infrastructure for sustainable fuels like bio-fuels, electricity, hydrogen and natural gas;
- Intelligent transport systems and new technologies (infrastructure and vehicles);
- Due coverage of all transport modes;
- Inter-modal connections;
- Connections between long distance transport and local transport/urban nodes;
- Links to third countries;
- Connections with regional networks.

QUESTION 4: 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?

How could the "conceptual pillar" be best reflected in planning at Community level?

RESPONSE: YES – a flexible approach would be appropriate.

JUSTIFICATION:

Although this answer has to be YES, further consideration has to be given to the level of flexibility that is being proposed within the Conceptual Pillar. There seems to be general confusion regarding the definition of the Conceptual Pillar, and the flexibility that it will deliver.

While there is general agreement that flexibility within the TEN-T to react to changing circumstances is to be welcomed, there is a need to further define how this will work in practice, particularly in relation to commitment to long term infrastructure developments. The market requires a degree of confidence that long term projects will be carried to conclusion, and that the proposed "flexibility" is not used to withdraw from projects over time. Flexibility does not mean less commitment or fewer obligations to implement priority projects.

The question of more or less "rigid" eligibility criteria is crucial here.

The CPMR supports a framework for analysing and selecting future priority projects, which we understand to be the conceptual pillar. This will help take into account the needs of business, and it might lead to a higher degree of private financing.

However, the basis for project definition and project selection should not be pure cost-benefit considerations, but the "European added value" which has, at its core, territorial cohesion.

The flexible approach could be dangerous if it reduced the level of commitment of the different financiers. The question of good governance of the network is therefore crucial.

The flexible approach must also guarantee the improvement of communications at regional level.

In order to avoid that some modes are not sufficiently supported (maritime for example, bearing in mind the difficulties to implement the Motorways of the Sea concept), **an earmarking system could be envisaged, thus preventing too much public money flowing towards road infrastructures.**

ADVANTAGES:

- 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);
- Allows for flexibility where necessary to facilitate the development of commercially viable services.

DISADVANTAGES:

- 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, funding instruments and coordination and governance mechanisms.

QUESTION 5: 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?

RESPONSE:

Modal earmarking in favour of sustainable modes

In order to ensure that a sufficient level of priority is granted by EU funds to sustainable modes, modal earmarking should be at least envisaged, as well as guaranteeing sufficient funds for intermodal infrastructures, logistic platforms... As regards ports and their intermodal connections and equipments, the current situation is no longer acceptable: they are under-financed by both TEN-T and the Structural Funds (highly regretted by DG Regio, but following national choices). Territorial impact studies should be introduced in the process of selecting projects co-financed by the EU (concretisation of the Lisbon Treaty).

Infrastructure pricing should be made more visible on the EU agenda, in order to prevent the Council blocking any evolution of the Eurovignette directive in favour of sustainable modes.

Maritime transport within TEN-T

Better integration of maritime transport into the wider hinterland networks is of prime importance. The flow of goods across maritime borders needs to be simplified. **The creation of a single European maritime space** may be one way to assist in redressing this imbalance, when compared to continental Europe land travel.

It is crucial that future maps include routes across the sea. We need an **integrated understanding of corridors.**

Implementation of the Motorways of the Sea

The CPMR agrees with the statement in the Green Paper that, "*The complexity of procedures for obtaining public financial support and the lack of clear objectives and criteria have however hindered any broad implementation of the concept so far*". It is a fact that potential users perceive MoS under TEN-T to be difficult to use. On this background **we expect the European Commission to take actions to improve the situation, and make the MoS instrument more user-friendly.** We would also recommend that the Commission works even closer with the various stakeholders in maritime transport undertaking a fundamental review of the MoS concept so that short sea shipping is supported and not constrained.

The Commission must however be careful that any measures it introduces in support of MoS services **do not provide an unfair advantage to some ports over others** (avoid distortion of competition).

The CPMR believes that the Commission should, as far as possible, try to harmonise criteria, schedules and procedures for MoS projects under the TEN-T and the Marco Polo programme – offering a more harmonised interface in relation to potential users and exploiting synergies of funding. Such an approach would also fit the ambition of the Green Paper to address the dynamic interaction between the infrastructure and service perspective, as well as strengthening market orientation.

The CPMR also believes that **stronger emphasis should be put on the cohesion objective for MoS in the TEN-T guidelines**, with a view of drafting more concrete criteria for MoS projects in peripheral areas with weaker traffic flows and longer distances – including outermost regions and islands - including wider opening for participation of small and medium-sized ports .

Regional airports within TEN-T

Regional airports are of vital importance for the accessibility of peripheral regions, and the slot allocation rules at international hub airports should ensure that existing services to peripheral regional airports can be retained and developed, and new routes encouraged to operate.

Freight and passenger transport present different requirements and thereby involve different treatment. Using the same means, instead of providing more options, results in a poorer service for both transport services.

There should be different corridors aiming at freight and passenger flows while minimising bottlenecks to maximise the overall network efficiency.

We have to think about corridors to ensure traffic efficiency, based on the principle that each mode is used according to its comparable advantage. Infrastructures need to be based on modal centres for correct distribution, both national and international, and local and urban.

It is very important to emphasise that almost all journeys are multimodal, with regards to both passengers and freight so the policy needs to ensure the right infrastructure basis in particular in terms of inter-modal terminals, rail, sea, dry ports...ultimately, efficient inland connections and the development of logistics nodes.

Bottlenecks have to be removed. Creation of dry ports would be one right solution to solve the excessive traffic concentration in specific points.

Freight is not homogenous

There is a tendency to assume that freight is homogenous. This is not the case and we would urge the European Commission to take into account the different needs of container and bulk freight movements as it develops its proposals for the future of the TEN-T network.

QUESTION 6: How can ITS, as 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 multimodal TEN-T? How can existing opportunities within the framework for 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?

RESPONSE:

This is a complex issue, but one that must be considered and developed, to allow maximum return to be achieved from existing physical infrastructure.

The rate of increase in travel demand, both for freight and passenger, would suggest that development of new physical infrastructure alone cannot meet this long term demand.

Technology in all its guises must be developed and harnessed in a manner to allow existing networks to deliver greater efficiency. Initiatives such as Galileo have the potential to radically change the way infrastructure space is managed, by providing accurate, reliable global positioning information. This has already been identified as potentially providing significant advancing in air traffic control, and of freight container tracking.

Where deployed ITS systems have already proven their ability to allow more to be delivered from the existing transport network.

QUESTION 7: 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?

Please justify your choice, and describe how such a widened concept should be defined.

RESPONSE: YES – the current concept of the infrastructure project of common interest should be widened.

JUSTIFICATION:

There is already debate regarding the funding of the vehicle within current Commission programmes. Defining the boundary between transport infrastructure and vehicles will continue to be difficult. For example, when comparing maritime transport to road transport, particularly in the case of Ro-Ro ferries, is the ship a vehicle or is it akin to the road infrastructure? After all, they both provide a "corridor" to transport the lorry.

There is ample evidence that a funding of infrastructure and vehicles together under a coherent programme is needed - as it is the case with TEN-T funding for ERTMS equipment on the track and in the locomotives.

However, the borders between infrastructure and vehicles should not be blurred, as this border is crucial e.g. for the separation of the state-owned railway giants all over Europe.

However, ultimately, whether a particular aspect is considered to be a vehicle or infrastructure is irrelevant, so long as the TEN-T instrument recognises their importance and provides a tool to allow pan-European development.

Infrastructure must adapt. Implementation studies should be encouraged.
Widening is not the only priority: it must be decided if vehicles will be financed or not.

QUESTION 8: Would a core network (bringing together a priority network approach and a conceptual pillar) be "feasible" at Community level, and what would be its advantages and disadvantages? What methods should be applied for its conception?

What basis could be used for its conception?

Which are the three aspects that need to be given highest priority in the core network development method?

RESPONSE: YES – a core network approach would be feasible.

JUSTIFICATION:

A core network is feasible, but it may lead to a diminution of constraints and commitments for Member States, if governance procedures are not appropriately defined. This is one of the challenges of the new guidelines to be elaborated: how to combine more flexibility with strong commitments for all public actors concerned? The flexibility offered by the Conceptual Pillar has to be balanced against the need to provide clarity and long term commitment. The creation of a dual layer core network must not lead to any dilution of resources or commitment from the public actors involved.

Here again, the earmarking system invented by DG Regio in order to concentrate structural funds on Lisbon priorities has proved to be efficient. Why not think of similar instruments in order to concentrate the TEN-T ... on Göteborg priorities.

MAIN ADVANTAGES:

- Strengthening the European planning approach;
- Combining the "traditional" infrastructure approach (essentially priority network) and a more flexible "conceptual" approach;
- Integrating transport infrastructure and transport policy developments in the best possible way;
- Establishing a strong basis for concentration of Community support (financial and non-financial).

POSSIBLE DISADVANTAGES:

- Difficulties regarding an appropriate planning method;
- Too much flexibility.

WHAT BASIS COULD BE USED FOR ITS CONCEPTION?

- Available research;
- New research;
- Expert groups;
- Involvement of key stakeholders, **including regional authorities.**

WHICH ARE THE ASPECTS THAT NEED TO BE GIVEN HIGHEST PRIORITY IN THE CORE NETWORK DEVELOPMENT METHOD?

- Climate change and other environmental objectives;
- Financing capacities;
- Technological challenges and opportunities of the future (transport and energy, infrastructure and vehicle);
- Economic sustainability.

QUESTION 9.01: How can the financial needs of TEN-T as a whole - in the short, medium and long term - be established?

RESPONSE:

This kind of financial approach, starting from the needs, seems to be too "theoretical". The first step is to identify the desirable network, which will give guidelines for spending European funding on transport for the next EU programming periods, from 2014 onwards.

We would favour initially establishing a network that fulfils the genuine needs of the EU. It can then be prioritised and amended subject to the political commitment, and funding levels, afforded to the instrument.

QUESTION 9.02: What form of financing – public or private, Community or national – best suits what aspects of TEN-T development?

RESPONSE:

The question is not only: where should the different EU funds operate, but also with which level of intensity. The EU toolbox for financing transport services and infrastructures will need to be transparent and sophisticated, in order to take into account with equity all kinds of situations: accessibility, sustainability, wealth... To fulfil this objective, transparent criteria must be elaborated, and the Regions have to be associated with this.

The decision making process to determine EU and national funding must be as transparent as possible and demonstrate that all costs and benefits have been taken into consideration in the process, and that European Added Value is always present and measurable.

QUESTION 10.01: What assistance can be given to Member States to help them fund and deliver projects under their responsibility?

RESPONSE:

The CPMR would encourage the Commission to create a "one window" approach to TEN-T funding applications.

Currently, projects have to apply to a variety of different financial instruments, all administered by different people, and sometimes different DGs.

Through the creation of an internal mechanism the Commission could create a single application "window" allowing one bid to be made. That single bid could then be assessed by the various DGs and the applicability, and intervention rates, agreed.

This would reduce the complexity of application to the various financial instruments, and provide project promoters with more certainty at an earlier stage.

The Commission must promote better coordination among Member States, but above all, **the Commission needs the European Union to define a position that gives greater stimulus to the financing of infrastructure networks.**

QUESTION 10.02: Should private sector involvement in infrastructure delivery be further encouraged? If so, how?

RESPONSE:

The issue of public-private partnership must be studied from a territorial cohesion perspective. Under no circumstances should the European Union support approaches which would favour the most developed European Regions and the operators situated in these Regions. Needless to say it will be easier to increase private funding in these Regions than in less developed Regions.

QUESTION 11.02: Is there a need for new financial instruments (including "innovative" instruments)?

RESPONSE: YES

JUSTIFICATION:

New taxation instruments need to be envisaged, in order to make the polluting modes contribute to financing "virtuous ones". This is a very wide field for thought and discussion, where strong and argued propositions are expected from the European Commission, in particular in the field of the contribution of road pricing to the financing of sustainable modes.

The "one window" application approach suggested under Q10.1 could be a relevant "candidate".

Even if it is always important to think about innovative instruments, the priority remains increasing budget allocation and redefining the tools and methods of financial participation in the European Union.

QUESTION 12.01: How could existing non-financial instruments be improved?

RESPONSE:

There is a need to continue and improve the mission of European coordinators. *(The CPMR is, for instance, very satisfied with the work currently undertaken by Luis Valente de Oliveira, in trying to make the 8 years old, but not yet implemented concept of Motorways of the Sea, operational.)*

As an instrument to introduce coherence into the core network, and into its implementation, the concept of European coordinators could be relevant; but not one coordinator for one transnational corridor - as is currently the case on some priority projects - but one coordinator for one part of Europe: in charge of organising discussions, using existing research results, and organising complementary forward-looking research exercises, and preparing implementation on a specific transnational European area (a "general" idea to be further explored and developed). **The participation of cities and regions would be compulsory in the governance of these "large geographical green corridors".**

This approach by large transnational corridors is, without doubt, conducive to resolving the problem of funding of the cross-border sections of the network. By integrating these often costly sections (crossing natural frontiers) in coherent geo-economic areas, it is easier to justify raising large public funding.

We call for an integrated approach, materialising in user-oriented concepts such as the "green corridor" approach which closely links infrastructure, service and innovative elements (e.g. ITS applications), and which brings all stakeholders and public authorities together to define more efficient transport solutions.

Pilot "green corridor" projects on selected international corridors will show how these green corridors can work. Such pilot projects should be supported and evaluated for a wider audience.

Although the scope of these arrangements is yet unclear, similar concepts of EU transport policy build upon such an approach – e.g. the "one-stop shop" for freight transport customers, the "intermodal freight integrator", "eFreight", the "freight railway network" and the "maritime space without borders".

QUESTION 12.02: Which new non-financial instruments should be introduced, for what reason?

RESPONSE:

Whatever the instruments made available, they need to be "intelligent", meaning able to be adapted to the diversity of situations, and to the different community aims pursued: cohesion, sustainability, accessibility...

The concept of "large geographical green corridors" explained above is one option.

The conceptual pillar can be used to allow supporting instruments to be introduced as they are developed.

QUESTION 13: Which of the options for developing the TEN-T is the most suitable, and for what reason?

RESPONSE: Option C: Dual layer: comprehensive network and "core network"

JUSTIFICATION:

A comprehensive network provides a large scale European Added Value: European actors, citizens, public authorities, professionals and businesses would be invited to consider their specific needs while always having in mind their contribution to building a European territory, more open to the world, with an improved and sustainable accessibility between its different parts. The core network would also materialise how the EU can, with its different financial and legal instruments, reduce the main bottlenecks inside Europe and at the doors of Europe.

Implementation of this option must guarantee the improvement of communications at regional level and the participation of cities and regions in both the planning and the creation of the networks.

The inclusion of a "conceptual pillar" would provide the future TEN-T with the flexibility to adjust to market conditions, and network pressures as they develop in the longer term. However, we would again like to draw attention to the fact that the "flexibility" suggested in the conceptual pillar has the potential to dilute commitment, and that the exact meaning of "flexibility" requires further definition.

All in all, we believe that option C has the greatest potential for developing a coherent and flexible TEN-T network with high European added value, facilitating sustainable development, territorial cohesion and good links to 3rd countries.

QUESTION 14: Would you like to make any further comment or proposal?

The CPMR underlines the importance of completing the existing 30 priority projects and that no new projects are introduced in the meantime. The priority routes display substantial recognised benefits for the EU and the disadvantages inherent in not completing these projects are significant. The Motorways of the Sea "project" is regarded to be of a more universal and permanent character, and should therefore be integrated in a future priority network (or whatever option is selected on the basis of the current consultation).

A relaxation of the State Aid guidelines to allow for wider use of PSO's in upholding transport services to peripheral areas, also across borders, would also promote territorial cohesion and should be considered in the context of the broader perspective on infrastructure policy introduced in this Green Paper.

The issues of the Outermost Regions and the Islands are not treated specifically in this contribution, but shall be taken into account in the CPMR's further consideration of the TEN-T review.

For more information, please contact Patrick ANVROIN:

Email : patrick.anvroin@crpm.org

Web: www.crpm.org - www.cpmr.org