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SAMFERDSELSDEPARTEMENT**

Ministry of Transport and Communications

European Commission - Directorate General for Energy and Transport
TEN-T
BE-1040, Brussels
Belgium

Your ref

Our ref
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Norwegian comments on Green Paper on a policy review of the Trans-European Transport Network

Dear Sir/Madam,

Reference is made to COM (2009) 44 final, published 4.february 2009.

Relevance and accessibility to markets

The revision of the TEN-T guidelines is of direct relevance to Norway since the guidelines are incorporated in the EEA Agreement. The guidelines are also defining the scope of relevant internal market legislation. Therefore Norway welcomes the opportunity to contribute in the process of revising the TEN-T guidelines.

Developing cross-border infrastructure networks of high standard is of primary importance for our accessibility to markets. However, since Norway does not participate in the TEN-T financial mechanism we are also focusing on policy issues and non-financial mechanisms like the need for improved co-ordination across borders, bench-marking and dissemination of best practice, and other horizontal issues.

Norway has actively participated in an informal Nordic-Baltic working group exchanging views on the TEN-T policy review in a broader regional perspective. Reference is made to a non-paper from the group forwarded to the Commission.

Increased focus on efficient and sustainable transport

The impact of green house gas emissions and climate changes call for adjustment of the TEN-T policy approach. The development of sustainable transport and logistics should be a core focus area of the revised TEN-T guidelines. The infrastructure policy for the

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future must put high priority to enhancing modal shift and co-modality, establishing “green transport corridors” and dedicated freight networks, and realizing the full advantage of the environmentally friendly modes of sea and rail transport.

Explicit recognition of the special challenges and needs of peripheral areas

The revised TEN-T guidelines should explicitly recognize the special challenges and needs of peripheral areas with long transport distances and relative low volumes to centrally located markets. Improved accessibility is a basic precondition for enhanced competitiveness for countries with location in the periphery of Europe.

The differences between heavily populated and more sparsely populated areas implies a need for flexibility in rules and regulations; one size does not fit all. Rules and regulations must be flexible to accommodate the continued use of existing well functioning management systems and methods, in so far as they are consistent with the aims of the TEN-T policy and guidelines.

Supports structure consisting of a comprehensive network and a core network

As described in the Green Paper the objectives set for the development of the Trans-European transport network have not been fully achieved. We support that new rapidly raising challenges justifies the undertaking of a fundamental review of the TEN-T policy rather than just reviewing and possibly updating outline plans and priority projects.

The Commission considers three options for further development of the TEN-T network. Even though there are clear similarities between option 1 and option 3, Norway supports option 3 with certain clarifications as described below.

Comprehensive network

The comprehensive network should continue to play an essential role in fulfilling the access function. Focus on improving accessibility to central markets as well as to peripheral areas is an important part of the comprehensive network. Therefore, no major revisions are needed if the goals and criteria behind the comprehensive network remain unchanged. The key issue for further development is to solve the current bottlenecks of transport and improve accessibility especially for freight transport. Updated maps of the comprehensive network should include extensions to neighbouring countries as appropriate.

In addition to the essential task of the comprehensive network to fulfil the access function, the contribution of the network to improving territorial and social cohesion is also relevant and should be considered in the preparation of new TEN-T guidelines.

Motorways of the Sea linking North Sea – Baltic Sea and the Barents Sea region

The Arctic and Barents region have plentiful of natural resources, such as fossil fuel and fisheries. In the short term, maritime transport in the High North will certainly increase due to exploitation of petroleum in this area. In a longer perspective, additional maritime transport corridors and routes in the north may evolve due to deglaciation of the Arctic. As a consequence, development of infrastructure, measures to enhance safety at sea and oil spill preparedness in this area must be given substantial attention in the years to come.

Hence, Norway underlines the importance of extending the Motorways of the Sea concept towards the Barents region and linking it with the MoS of the North Sea and MoS of the Baltic Sea, as pointed out in the final report from the High Level Group on the extension of major Trans-European Transport axes to neighbouring countries and regions.

Extension to neighbouring countries

The extension of TEN-T networks to neighbouring countries is important as a tool of stimulating cooperation and facilitating trade and growth in a wider European context. The development of transport connections with Russia, is considered especially important as the East-West transport flows are growing fast. Facilitating cross-border connections can be considered a key element for further development in the Northern Dimension region. Seen from our perspective the Northern Axis, incl. the prospects of developing a land transport corridor linking Norway with neighbouring countries like Sweden, Finland and Russia, represents an important future oriented transport corridor. Furthermore, improved east-west land transport connections could also stimulate development of alternative maritime transport routes and connections.

The forthcoming partnership of transport and logistics within the Northern Dimension will be a good platform for developing relevant transport corridors. We believe such a regional partnership will result in better co-ordinated and faster implementation of projects of common interest between EU-Member States and neighbouring countries in the High North and the Baltic Sea region.

Priority network

Norway supports the idea of a core network with priority projects of European interest replacing disconnected projects, and a more flexible and business oriented pillar which responds to more short and medium term needs. The priority network should also secure the development of European-wide transport corridors which also extend out to neighbouring countries of the EU.

The identification principles of projects of European interest evolving towards a European-wide priority network should be elaborated in order to ensure a geographically balanced approach. Seen from our perspective there is a risk that the priority network approach may excessively focus on solving transport problems in geographically defined core areas, while the other objectives behind the European-wide transport network can easily be ignored. This includes a risk for countries located in the periphery of Europe that the main part of the transport system in this area may be excluded from the priority network.

The priority network approach should clearly consider the special challenges of geographically peripheral countries, and primary goals of projects, such as accessibility and seamless connections to European markets, should be given priority. This will also emphasize the significance and completion of the existing priority projects of special importance for us, like the Nordic Triangle and the Fehmarn Belt-axis. The Nordic Triangle is a good example of well connected cross- border project.

Norway would like to underline the importance of the "Motorways of the Sea", being a priority project also in the revised TEN-guidelines. However, the concept of Motorways

of the Sea to a large extent still remains undefined. The concept and its project definition should be clarified, and difficulties with regard to TEN-T project participation and funding should be made more geographically flexible.

Since Norway does not participate in the financial mechanism of the TEN-T program, our prioritization of projects, financing and implementation are fully based on national decision-making. However, when it comes to cross-border infrastructure development, there is a tradition of exchange of information and co-operation with our neighbours. The revised guidelines should stimulate coordination processes, incl. exchange of best practices on a broader scale.

Raised focus on horizontal measures for improving network integration and efficiency

As we understand the goal of the conceptual pillar is to introduce flexibility into the transport network development. However, the content and added value of the concept should be clarified.

Rapid technological development provides a possibility to develop new types of services as well as influence and manage traffic demand. Intelligent transport systems (ITS) provide new opportunities for the prevention of climate change as well as potential alternatives to extensive transport infrastructure investments for responding to the growth in traffic demand.

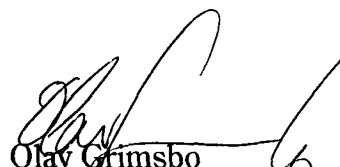
The future TEN-T development should cater for a wider introduction of intelligent transport systems to support Community policy objectives in the sector, like the ERMTS in the rail sector. The Norwegian developed ITS architecture ARKTRANS may represent a common platform for applications in and across different transport modes.

The TEN-T network should still be used to introduce major Community policy objectives such as in the area of road safety to promote homogeneous road safety standards and systematic road safety policies across member states. However, regulations should acknowledge the different member states' levels of road safety by accommodating differentiated methods of achieving these objectives.

In conclusion, horizontal measures are considered significant for Norway, especially from the viewpoint of climate change and mobility management, and thus these measures should be included in the concept of the conceptual pillar. However, it should also be recognized that meeting basic needs of sustainable accessibility requires a reasonable combination of infrastructure investments and horizontal measures.

Yours sincerely,


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