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**MINISTRY OF COMMUNICATIONS  
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30 April, 2009

**BY E-MAIL**

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Dear Sirs,

**GREEN PAPER**  
**Towards a Better Integrated Transeuropean Transport Network**  
**at the Service of the Common Transport Policy**  
**TEN-T: A Policy review**  
**Contribution for the Public Consultation from the**  
**Ministry of Communications and Works, Republic of Cyprus**

— Please find herewith the Ministry's of Communications and Works contribution for  
the Public Consultation of the Green Paper.

Sincerely yours,

**E. Epaminonda**  
**for Director**  
**Public Works Department**

Copy to: Permanent Secretary  
Ministry of Communications and Works

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## **GREEN PAPER**

### **Towards a Better Integrated Transeuropean Transport Network at the Service of the Common Transport Policy**

#### TEN-T: A Policy review

#### **Contribution for the Public Consultation from the Ministry of Communications and Works, Republic of Cyprus**

Cyprus, a member state of the European Union (EU), is an island of the size of 9.251 square km. It is situated at the outskirts of the EU and the northeast part of the Mediterranean Sea, while at the same time it is very close to the major trade arteries that connect Europe with the Middle East.

Cyprus has an extensive main road network of approximately 2.370 km, which connects the island's main cities and some 5.150 km of urban and rural roads. In the last twenty-five years, the Government of the Republic of Cyprus embarked on major highway development programmes aiming at linking the cities with major centres, ports and airports with motorway-standard roads, while also improving accessibility of the rural areas to the major urban centres. The increase in road mileage and the upgrading of the highway network has created increased responsibilities for the Government, in terms of maintaining the roads, providing for road safety and improving quality of the environment. Due to its small size and population, Cyprus does not have a railway network nor any light transit systems. Thus, public transport is confined to urban and rural buses as well as inter-urban taxi services.

The upgrading of the ports and airports of Cyprus was considered necessary by the Government in order to cater for the large number of tourist visiting the island each year, but also to provide better services for freight, as the only freight route between Cyprus and the rest of the world is by sea and air. Cyprus ports are major hubs for freight transport in the region of the Mediterranean Sea.

The TEN-T network of Cyprus consists of about 180 km of road network, mainly motorways (165 km), two international airports (Larnaca and Paphos) and two international ports (Limassol and Larnaca).

Having read and evaluated the Green Paper - Towards a Better Integrated Transeuropean Transport Network at the Service of the Common Transport Policy (TEN-T: A Policy review), Cyprus would like to point out the following issues:

- Under the current policy of the TEN-T network, Cyprus, being an island in the south-eastern periphery of the European Union, is in an unfavourable position, as it has no physical borders with the Continental Europe and therefore it cannot participate in any priority projects (with the exception of the Motorways of the Sea, where benefits, and more specifically funding, are limited).

- While the other EU member states (except Malta) benefit from improvements in their rail, road and inland waterways infrastructure, occurring through the priority projects, no such benefit applies in the case of Cyprus. On the contrary, Cyprus suffers high air travelling costs, when compared to the rest of EU member states, since there are no other realistic options available.
- The current EU (and TEN-T) policy promotes the development of the rail network. Rail is not an option (from a financial standpoint) for small island member states, as they have no value added from through traffic (persons and goods).
- Under the proposals in the Green Paper for the future of the TEN-T network, it is clear that because of limited funds available, emphasis will be given to the priority projects and to the development of the priority network of the member states connected to them. As a result, the benefits for Cyprus will be further reduced.
- The Green Paper highlights the importance of the development of good connections to Europe's immediate neighbours, an area where Cyprus could play a vital role, being close to Africa and the Middle East (which should in our opinion also be included in the Green Paper), but does not indicate the tools (especially funding) on how this ambitious project will be accomplished.

Cyprus welcomes any efforts and initiatives towards the development of the future of TEN-T policy in a way that ensures the proper expansion and growth of the networks in all transport modes.

In the Green Paper, three options for the future TEN-T development are seen possible:

- (1) Maintaining the current dual layer structure with the comprehensive network and (unconnected) priority projects
- (2) Reducing the TEN-T to a single layer (priority projects, possibly connected into a priority network)
- (3) Dual layer structure with the comprehensive network and a core network, comprising a – geographically defined – priority network and a conceptual pillar to help integrate the various transport policy and transport infrastructure aspects.

Cyprus acknowledges the fact that the above options try to build on past achievements and ensure continuity with the previously agreed approach but on the same time all three options fail to take into consideration the above concerns. Option 3, appears to be more flexible and could form the basis of an acceptable compromise, provided that the needs of the island member states are addressed explicitly.

Cyprus believes that the relevant Council Conclusions which are currently under examination should ensure that the European Commission should be open to new approaches in order to respond to future challenges and opportunities whilst emphasizing the needs and concerns of the island peripheral states.

More specifically:

- Irrespective of the option selected, the criterion for funding through the various EU funds should remain the (revised) comprehensive TEN-T network, not the proposed core network.
- The current funding status of the multi-annual and annual programmes should be maintained. In the context of the multi-annual programme is proposed that more flexible criteria are set up for the projects arise that from the “conceptual pillar” (e.g. motorways of the sea and ITS projects could be proposed for funding by one member state and not at least two member states as it is currently the case).
- The functions of the “conceptual pillar” should be identified clearly. Emphasis should be given to technology/ innovation (ITS), road safety, sustainability (modal shift, reduced congestion), efficient freight transport and climate changes. Additionally, the tools for the development of good connections to Europe’s immediate neighbours could also be included under this pillar.
- A special provision for the support of island member states should be included in one of the following three forms:
  - The ports, airports and links to the hinterland are included in the priority projects (priority network).
  - The ports, airports and links to the hinterland are given a similar status (as far as funding is concerned) to the priority projects (priority network).
  - A separate priority project, without geographical orientation, is created to include the ports, airports and links to the hinterland of island member states.

**Ministry of Communications and Works**  
**Republic of Cyprus**

**April 2009**