



Number: 5400-15/2009/25

Date: April 8 2009

**European Commission**

**By e-mail: TREN-B1-GREEN-PAPER-TEN-T@ec.europa.eu**

**Subject: Contribution of the Ministry of Transport of the Republic of Slovenia to the Consultation on the Green Paper - TEN-T: towards a better integrated transeuropean transport network at the service of the common transport policy**

The Republic of Slovenia would like to thank the Commission for the Green paper on TEN-T policy and express general support to its revision. But at the same time we would like to underline that future work in this field should be prepared carefully, by taking into account the aims of the Community and all the specificities of the Member States. Below we are sending you a more detailed position of the Republic of Slovenia on the Green paper, firstly on the options for further TEN-T development and secondly on the specificities which should be taken into account when forming the future TEN-T policy.

Given the arguments from the Green Paper, it is impossible to single out just advantages or disadvantages on each individual concept (option) or level of TEN-T policy.

We should for example keep the entire network comprehensive in order to fully take into account and acknowledge the past work carried out and to avoid "new reviews" too often. There is no doubt that transport flows on individual routes are a dynamic category, but we think that the system ought to have certain permanent features.

In order to enable the planning of use, better exploitation of capacities and an increase in the share of transport, we should introduce some new elements or review the old ones when planning future TEN-T development, in particular:

- clearly defined objectives in the field of EU infrastructure;
- harmonised approach to the greening of transport sector (the principle of horizontal approach, taking into account the implementation in all transport modes while respecting national specificities) and efficient use of energy; both will decisively impact the decisions on constructing or modernising transport infrastructure, particularly in the light of long term forecasts of transport flows;
- timely implemented infrastructure projects.

We should also, as mentioned in the Green paper, take into account some of the new views of European Transport Policy (co-modality, multimodality, interoperability etc.), Community initiatives (freight transport logistics, railway network for competitiveness of freight transport...), ITS (especially regarding transport management) etc.

The Green Paper also stresses the importance and so-far benefits of determining priority projects, namely that: "*action – directed towards more limited and commonly agreed objectives – has been far more effective and visible*". We think it is important that the Community concentrates all its resources (especially financial) to target projects and that these resources are not too dispersed.

We thus believe that the levels which are defined in the current guidelines for TEN-T Community network should be maintained as a starting point for future transport policy. But we should also take into account new elements in the field of transport: co-modality, interoperability, intermodality, intelligent transport systems, new requirements regarding negative environmental impacts and efficient energy consumption, the related international initiatives etc. The selected priority projects should be comprehensively defined with regard to their interoperability (especially in the field of railways); multimodality; connectivity with other EU TEN-T or neighbourhood projects with a clear definition of logistic or intermodal terminals of European importance; significance for achieving environmental objectives and efficient energy consumption etc. If this brings us to the proposed "*core network*" which would be defined on the basis of priority projects, then we can support this option. Regarding other parts of the "*comprehensive network*", we should plan contact points between interoperable and other networks.

When planning the future TEN-T policy, following facts should also be taken into consideration:

1. discussion about TEN-T network has taken place in pre-accession period as a preparatory phase but it was only in 2004 that the new Member States started to participate equally, actively and according to Community regulations in the implementation of the European transport policy and TEN-T policy. During this period, new member states were not able to bridge the development gap between them and the old EU Members. But they nevertheless invested all efforts in achieving this. Slovenia for example built a large part of its motorway network with its own resources, while the majority of European funds was used for the modernisation of the railway infrastructure along the route of Priority Project No 6 (even though at the time we faced a problem of inappropriate basic motorway infrastructure, other railway connections and other transport infrastructure, including terminals or logistic centres). And it should be noted that the biggest cross-border railway projects, which are financially most demanding for Slovenia, have only begun. Changing priorities in this area would have a strong negative impact in Slovenia as well as, we believe, in other Member states We should also be aware that it takes a long time to realise infrastructure projects, which is why we should not change the priorities easily. When evaluating eligibility and performance of future projects, we should therefore take into account the amount of funds per capita that each Member states has invested over the past years.
2. from the point of developing multimodality, we should consider more appropriate Community co-financing of the construction of logistic or multimodal centres. It would probably be useful to work on the Community level to elaborate suitable expert basis for including such centres in the framework of TEN-T.
3. multimodality can be achieved only if the policy strictly respects the environmental criteria (actual vehicle emissions, type and hazard of cargo) and stimulate research and development, particularly in

transshipping technology, since the speed of landing/transshipping cargo is increasingly becoming a bottleneck in the modern transport system. The transshipment logistics and related expenses are the biggest “enemies” of co-modality.

4. we should provide for more TEN-T financial assistance to the projects which are innovative and of common significance for the Community and which provide e.g. multimodal, multilingual information systems for real time monitoring of vehicle position and the systems for monitoring cargo.
5. higher level of co-financing cross-border projects and feeder lines, which are already foreseen as bottlenecks, should be maintained in the future. We deem that this is an important tool for encouraging cross-border connections and therefore realising Community objectives. The projects of hinterland railway connections in the framework of motorways of the sea should also be included in a higher level of co-financing.
6. we should more precisely determine the tasks of European coordinators. Apart from their “usual” role as rapporteurs for individual projects, they should also encourage cooperation between states and propose new measures of innovative financing on the basis of best practices from other priority projects. With a permanent presence on the spot, they should participate in analysing impacts of delays on the construction and cooperate with the European Commission and/or EIB to help finding additional organisational and financial incentives.
7. bearing in mind the experience with EU enlargement of 2004, we should take into account the future accession of the Western Balkans when implementing TEN-T network . We are also currently in the process of concluding a transport treaty with the region. In this respect, we could for example consider the option of appointing a “facilitator” for the Western Balkans countries. Due to its orientations and activities during its Presidency, Slovenia should be a serious candidate (or even entitled) to get this post.
8. We should also note that a joint evaluation of economically differently developed regions does not necessarily provide a correct assessment. If for example we wish to ensure sustainable development of the transport sector of South East Europe (which requires considerable investments based on the forecasts of future flows), the assessment of importance of a South European project will vary significantly if it is evaluated in a similar way as a project in the region of North Atlantic ports (where traffic is much more concentrated). We should stress that in the time of economic crisis, it would be useful to concentrate on ensuring comparable quality of transport infrastructure along the entire routes of priority projects. This would improve transport flow on these routes in the time of future recovery.

We sincerely hope that our positions will be fully taken into account when forming and implementing the future TEN-T policy.