

**Regarding: Consultation on the Future Trans-European Transport Network,
COM (2010) 212**

The company E22 AB was founded in 2006 by Skåne Regional County, the Regional Council of Blekinge, the Regional Council in Kalmar County, Östsm Regional Development Council and the Chamber of Commerce and Industry of Southern Sweden. The purpose of the company is to show the strong commitment from the political level as well as the business community for improving the Swedish part of the road E22, ensuring a standard in accordance with its strategic function.

The E22 is already part of the trans-European transport network and plays a crucial role in developing stronger transport links between the Scandinavian countries and Poland, the Baltic states, Russia, the Ukraine as well as other countries. Hence, the E22 AB would like to take this opportunity to comment on some of the questions raised in the paper on the future strategy for the TEN-T.

The first question addresses the principles and criterias for designing the core network. E22 AB is of the opinion that the principles and criterias are indeed of high relevance. They also reflect the complexity of physical planning and, therefore, the effects of the suggested planning methodology will not be fully apparent until later in the process. It is also later in the process where contradicting principles and targets will appear, demanding solid and consistent ways for making priorities. E22 AB would like to underline, however, that most principles are well aligned and address the critical challenges for the transport sector. They also complement the work conducted within the member states by emphasizing foreign and global patterns of trade

and the function of the inner market, specifically. This is criterias that typically have a tendency of weighing less in the national planning process.

Also, the principles for the core network implicitly underline the importance of studying and improving strategic, longer links in the transport network. Due to a combination of factors such as profitability models being incapable of quantifying dynamic effects on the economy of infrastructure investments and an unfortunate principle of financing infrastructure on a year-to-year basis, road projects especially tend to be too small-scale. In a study by consultancy WSP, ordered by E22 AB, it was shown that the average length of larger Swedish road projects during the period 1998-2008, was only 10.5 kilometres. Typically, a few years later, the neighbouring distance is improved, instead of building the two distances as one. The study shows that by doubling the distance, the average cost per kilometre road is reduced with close to 20 %. Also, dynamic effects on labour market and business activities are quicker realised. One of the most important functions of the TEN-T is definitely to highlight the importance of strategic links.

Another important function is of course to stress the need for multimodality. This is of specific interest to the E22 AB and the people and enterprises indirectly represented by the company. The road E22 is a backbone for the transport infrastructure in the south-eastern parts of Sweden. The E22 connects strategic Swedish ports such as Trelleborg, Karlshamn, Karlskrona Oskarshamn and Norrköping. Because of the dampening effect of the iron curtain on interaction across the Baltic Sea, its standard is far too low to take proper advantage of the opportunities arisen in the Baltic Sea area. In order to realise the potential in the region, infrastructure on land must be sufficiently developed to make sea transports useable. Multimodality is never stronger than its weakest link.

The paper on the future strategy of the TEN-T also addresses how the TEN-T planning could increase the contribution from the transport sector to the strategic targets of the Europe 2020-agenda. It should be underlined that a well functioning transport sector is absolutely critical for economic growth and thus a requirement for a strong European development. Hence, the TEN-T planning process is of great importance to the Europe 2020-agenda. By working along the principles and criterias identified, the contribution of the process will hopefully be ensured.

Another issue is funding at the EU level, which is crucial for a fast and efficient implementation of the identified objects in the TEN-T. The implementation of the TEN-T could most surely benefit from setting up a European funding framework. Infrastructure development is one of the most efficient ways of increasing regional competitiveness, which is reflected in the activities of the European Regional Development Fund. It is also difficult to argue against the benefits of improved communications when it comes to social cohesion. A higher ambition of co-ordinating the investments and the funding from various sources and possibly levels, could have a positive impact by reassuring that the member states fulfil their infrastructure plans and to ensure maximum leverage of the investments.

The E22 AB has developed various solutions for improving the E22 using Public-Private Partnerships. Sweden is one of a shrinking number of European countries that have not still adequately tested PPPs. A European funding framework where the European Investment Bank plays an important role could have a positive effect on the further development of PPPs and other joint financing models. Also, the E22 AB fully recognises the potential benefits from a more pro-active commitment from the EIB, sharing their experience and expertise.

The E22 AB is full of hopes for the coming revision of the TEN-T and look forward to participating in the future process.

Southern Sweden September 15th, 2010

E22 AB



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