

TEN-T Policy Review

*Submission To DG MOVE
By Rosslare Europort*

13th September 2010



Rosslare Europort

TEN-T Policy Review: Submission To DG MOVE

Rosslare Europort welcomes the publication of the Commission Working Document¹ inviting the submission of comments on future Trans-European Transport Network ("TEN-T") policy. We are pleased to have this opportunity to be heard, and we set out our submissions below.

Background Information On Rosslare Europort

Rosslare Europort is a commercial sea port at the south east corner of Ireland, managed and operated by Iarnród Éireann-Irish Rail, the national railway operator.

As can be seen in Schedule A, Rosslare Europort is the fourth biggest port in Ireland by tonnage handled, and the second biggest port for unitised freight. It is also one of only two major freight ports serving the important Dublin market - Rosslare Europort is Dublin's second port.

The Methodology For TEN-T Planning

The questions posed at the end of section 3 of the Commission Working Document includes the following question:

Question: *Are the principles and criteria for designing the core network, as set out above, adequate and practicable? What are their strengths and weaknesses, and what else could be taken into account?*

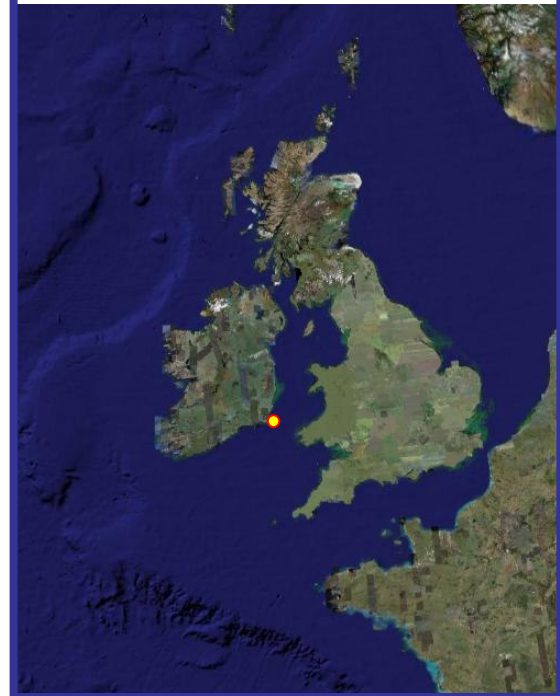
Our Answer: *There is one significant criterion omitted from those listed in the Commission Working Document, viz. NETWORK REDUNDANCY.*

Every successful network (e.g. the Internet) is designed so that in the event of a linkage being broken or blocked, network traffic can be easily rerouted along an alternative path and get efficiently to its destination, in spite of the network disruption. Without an adequate level of such NETWORK REDUNDANCY any network is vulnerable, and not fit for purpose. The Commission Working Document says "the core network will be made up of nodes and links of the highest strategic and economic importance throughout the EU. It will cover all modes of transport... in a sufficiently flexible way..."² NETWORK REDUNDANCY is the essence of such flexibility.

Location Of Rosslare Europort

Longitude: 6°20'W

Latitude: 52°16'N



In Ireland, and indeed Europe, considerable attention is given to the issues of energy security, food security, and the like. However, the equally important security of our trading routes does not seem to be explicitly addressed.

Other aspects of EU policy implicitly recognise risks to trade. For example the International Ships & Port Facilities Security Code³ ("ISPS") and the Port Security Directive⁴ both require a risk-based approach to security in European ports. According to ISPS the mandatory port facility security risk assessment should "take into account... the economic significance of the port"⁵. However, while ISPS requires an assessment of "(1) identification and evaluation of important assets and infrastructure it is important to protect; (2) identification of possible threats to the assets and infrastructure and the likelihood of their occurrence, in order to establish and prioritise security measures; (3) identification, selection and prioritisation of countermeasures and procedural changes and their level of effectiveness in reducing vulnerability; and (4) identification of weaknesses, including human factors, in the infrastructure, policies and procedures"⁶ neither ISPS nor the Port Security Directive address the potentially disastrous consequences of a security failure. NETWORK REDUNDANCY in our trading network is the essential measure to complement EU port security policy. International trade is so important that a failsafe is required in the event of a failure of protective measures as prescribed by port security policy. That failsafe is NETWORK REDUNDANCY.

Implications Of NETWORK REDUNDANCY As A Core Network Criterion

As can be seen from Schedule A, the roll-on-roll-off ("roro") mode is a significant element of Ireland's international trade, and is in fact its fastest growing element. Roro is significantly larger than the load-on-load-off ("lolo") mode, but it is completely dependent on a high quality road infrastructure. Given (i) the significance of the roro mode to Ireland and (ii) Ireland's peripherality, it would seem vitally important that her internal road network, as well as the pan-European roro shipping and road networks along which Irish traded goods must move, should be Ten-T Core Network Priority Axes.

Schedule B shows the existing PRIORITY AXIS NO 13 UNITED KINGDOM/IRELAND/BENELUX ROAD AXIS, and Schedule C shows the existing PRIORITY AXIS NO 26 RAILWAY/ROAD AXIS IRELAND/UNITED KINGDOM/CONTINENTAL EUROPE. The road connections in both of these priority axes make the Republic of Ireland entirely dependent on (i) Dublin Port, and (ii) Great Britain's road network for roro access to the Continental Mainland (Port of Cork has no roro traffic worth speaking of – see Schedule A).

Given the concentration of economic activity in the Greater Dublin Area it is understandable that Dublin Port has a bigger throughput than any other port in the State. However, that does not mean that it is right or safe to put all our eggs in that one basket. We cannot ignore the vulnerability of the trade network to a significant disruption at a single node (Dublin Port) or a single linkage (British roads).

For example, on 7th August 2010 two vessels collided, blocking the approaches to Mumbai port⁷, the largest port in India. The port was closed to all traffic, and only partially re-opened on 13th August 2010⁸; it is expected to take 45 days⁹ before it returns to normal. Is a collision in the channel into Dublin Port so impossible? What would the consequences be for the Irish economy?



The dependency on British roads unnecessarily exposes Irish imports & exports to a number of serious risks:

1. There is significant congestion on British roads which adversely affects traffic to/from Ireland in terms of both delay and cost¹⁰.
2. The UK Government is (understandably) reluctant to incur significant capital cost in providing additional road capacity for Irish transit traffic which makes little or no contribution to the UK economy¹¹.
3. Irish traffic on British roads is targeted by British enforcement agencies with powers to enforce on-the-spot fines, thus adding cost to Irish exports & imports¹².
4. A substantial portion of Irish exports and imports are at risk of significant cost increases if the UK Government were to introduce general road tolls or tolls on trucks, whether on all trucks or just those transiting through Britain¹³.
5. A simple shift of Irish ro-ro traffic from the British Landbridge Corridor to the Continental Direct ro-ro corridor *via* Rosslare would generate significant environmental benefits (see Schedule F).

It should also be noted that the Dublin/Cork Road element of PRIORITY AXIS No 26 RAILWAY/ROAD AXIS IRELAND/UNITED KINGDOM/CONTINENTAL EUROPE makes no sense since Cork has virtually no ro-ro or passenger traffic to the Continent (see Schedules D & E). The Port of Cork has failed to build up a critical mass of ro-ro traffic simply because it is too far from Dublin.

Proposed Revised Priorities

1. To achieve security for Irish Trading routes there should be another Core Network Priority Road Axis connecting Ireland to the Continental Mainland.

2. The Continental inter-urban road network is not seriously congested in the same way as the British network¹⁴.
3. The additional Core Network Priority Road Axis should be *via* Rosslare Europort because:
 - a. Rosslare Europort is the second biggest roro port and the second biggest unitised freight port in the State.
 - b. Rosslare is Dublin's second port, and the only other large-scale Irish seaport (apart from Dublin port) serving the Dublin market.
 - c. Rosslare Europort is the closest Irish port to the Continental Mainland.
 - d. Rosslare Europort is the largest Irish port in terms of roro traffic to the Continental mainland (see Schedule D) (Note that although the overall level of traffic on the Continental Direct traffic is relatively low, a major reason for this is that the Irish road network to/from Rosslare Europort and the French road network to/from Cherbourg are not as good as the road connections to other ports).



4. The priority for route E01 Larne to Rosslare Europort should be re-instated (see map on previous page).
5. The route from Cherbourg to Caen should also be prioritised (see map on previous page).
6. As shown in Schedule E, a shift of traffic from UK Landbridge to the Continental Direct Corridor would have significant environmental benefits, even though the traffic would remain in the roro mode. These benefits are as much as €700 per truck, using the Marco Polo Calculator.

¹ Commission Working Document: Consultation On The Future Trans-European Transport Network Policy; COM(2010) 212 final, Brussels 4.5.2010.

² Ibid, page 5, "Planning the core network", 1st paragraph.

³ Adopted by the International Maritime Organisation and integrated into the International Convention for the Safety of Life at Sea 1974 on 12th December 2002, and given legal effect in the EU by Regulation 725/2004 with effect from 1st July 2004.

⁴ Directive 2005/65/EC.

⁵ Regulation 725/2004, Annex III, paragraph 15.5.

⁶ Regulation 725/2004, Annex II, paragraph 15.5.

⁷ See: <http://www.maritimeprofessional.com/Blogs/Collision-at-Mumbai-port-causes-oil-spill---preven/August-2010/Collision-at-Mumbai-port-causes-oil-spill---preven.aspx>.

⁸ See <http://www.transportweekly.com/pages/en/news/articles/74783/>.

⁹ Ibid.

¹⁰ See http://www.irishspatialstrategy.ie/docs/20_exec_summary.pdf, page 5, first two bullet points.

¹¹ See http://www.irishspatialstrategy.ie/docs/20_exec_summary.pdf, page 5, ninth bullet point.

¹² See <http://www.roadtransport.com/Articles/2010/04/26/135993/Irish-complain-of-heavy-handed-treatment-by-VOSA.htm>. See also penultimate paragraph of <http://www.roadtransport.com/Articles/2010/06/10/136250/VOSA-issues-1633.2m-of-GFPs-in-nine-months.htm> which indicates that although Irish trucks account for only 2½% of vehicles Irish drivers pay 7.6% of fines. In fact this figure appears to be understated because a high proportion of drivers of Irish trucks are polish, and Poles pay 8.2% of fines. See also http://www.irishtrucker.com/news/news_detail.asp?nid=6085 and <http://www.irishtrucker.com/articles/2006/october/vosa.asp>.

¹³ See http://www.irishspatialstrategy.ie/docs/20_exec_summary.pdf, page 7, third bullet point.

¹⁴ See http://www.irishspatialstrategy.ie/docs/20_exec_summary.pdf, page 5, fourth bullet point.

Schedule A: Statistics Of Port Traffic In The Republic Of Ireland

Relative Sizes Of Irish Ports¹⁵

Total Tonnage of Goods Handled By Port in 2009

	<u>000 Tonnes</u>	<u>%</u>
Dublin	18,605	44.4%
Cork	7,969	19.0%
Shannon Foynes	7,578	18.1%
Rosslare	2,328	5.6%
Waterford	1,631	3.9%
Bantry Bay	933	2.2%
Galway	723	1.7%
Drogheda	556	1.3%
New Ross	515	1.2%
Greenore	390	0.9%
Dundalk	222	0.5%
Kinsale	143	0.3%
Killybegs	87	0.2%
Wicklow	73	0.2%
Sligo	52	0.1%
Youghal	26	0.1%
Dun Laoghaire	14	0.0%
Castletownbere	17	0.0%
Tralee Fenit	17	0.0%
Arklow	0	0.0%
Kilrush	0	0.0%
	41,879	100.0%

Tonnage of Unitised Freight Handled by Port in 2009

	<u>Roll-on/ roll-off traffic</u>	<u>Lift-on/ lift-off traffic</u>	<u>Total unitised freight</u>
	<u>000 Tonnes</u>	<u>000 Tonnes</u>	<u>000 Tonnes</u>
Dublin	8,543	4,323	12,866
Rosslare	2,328	..	2,328
Cork	43	1,421	1,464
Waterford	..	902	902
Drogheda	..	56	56
Dun Laoghaire	14	..	14

Goods Handled (000 Tonnes) By Type Of Cargo And Year¹⁶

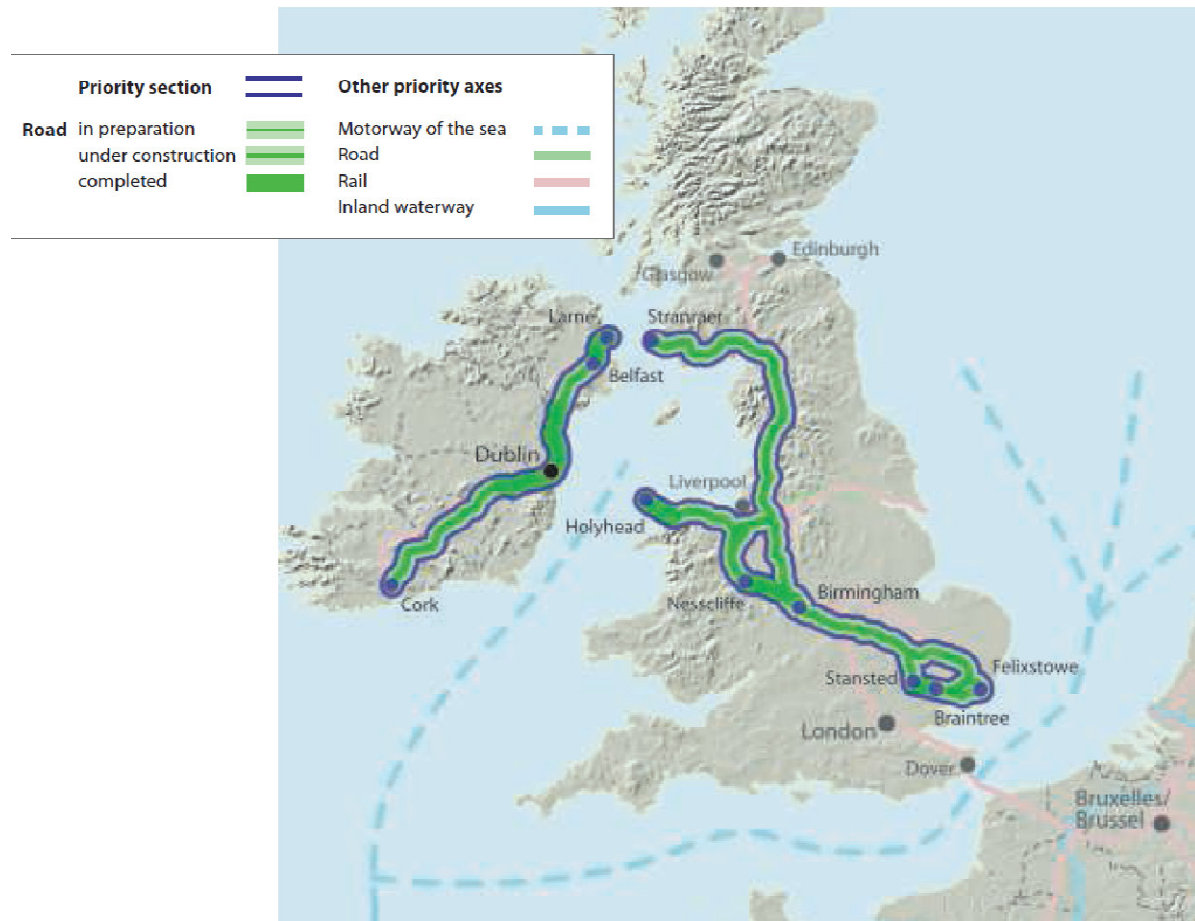
	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	% Change
Roll-on/roll-off traffic	8,947	9,253	9,449	9,857	10,570	11,816	11,915	12,547	12,080	10,928	+22.1%
Lift-on/lift-off traffic	6,262	5,731	5,919	6,574	7,022	7,803	8,472	8,876	7,945	6,702	+7.0%
Liquid bulk	14,008	14,247	13,154	12,966	13,315	14,759	14,301	14,348	13,315	12,100	-13.6%
Dry bulk	14,463	14,832	14,775	15,024	14,828	15,589	16,215	15,822	15,905	11,185	-22.7%
Break bulk and all other goods	1,593	1,732	1,622	1,743	1,984	2,179	2,415	2,548	1,836	964	-39.5%
All types of cargo	45,273	45,795	44,919	46,164	47,719	52,146	53,318	54,141	51,081	41,879	-7.5%
Roll-on/roll-off traffic	19.8%	20.2%	21.0%	21.4%	22.2%	22.7%	22.3%	23.2%	23.6%	26.1%	
Lift-on/lift-off traffic	13.8%	12.5%	13.2%	14.2%	14.7%	15.0%	15.9%	16.4%	15.6%	16.0%	
Liquid bulk	30.9%	31.1%	29.3%	28.1%	27.9%	28.3%	26.8%	26.5%	26.1%	28.9%	
Dry bulk	31.9%	32.4%	32.9%	32.5%	31.1%	29.9%	30.4%	29.2%	31.1%	26.7%	
Break bulk and all other goods	3.5%	3.8%	3.6%	3.8%	4.2%	4.2%	4.5%	4.7%	3.6%	2.3%	
All types of cargo	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	

¹⁵ Source: www.cso.ie.

¹⁶ Ibid.

Schedule B: Priority Axis No 13

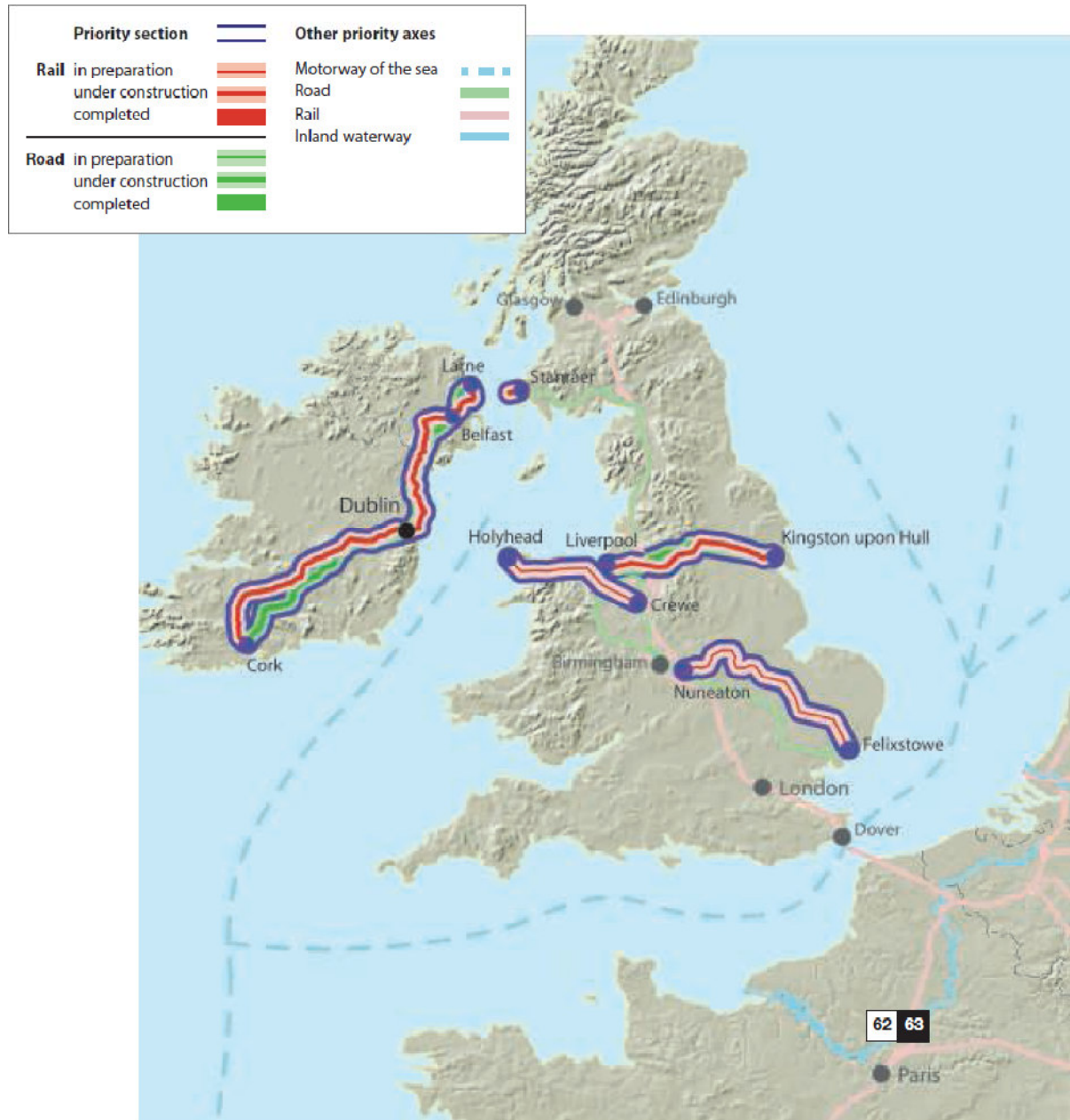
United Kingdom/Ireland/Benelux Road Axis¹⁷



¹⁷ Page 36, European Commission Trans-European transport network: TEN-T priority axes and projects 2005; Luxembourg: Office for Official Publications of the European Communities; 2005; ISBN 92-894-9837-4.

Schedule C: Priority Axis No 26

Railway/Road Axis Ireland/United Kingdom/Continental Europe¹⁸



¹⁸ Page 62, European Commission Trans-European transport network: TEN-T priority axes and projects 2005; Luxembourg: Office for Official Publications of the European Communities; 2005; ISBN 92-894-9837-4.

Schedule D: Statistics Of Roro Port Traffic In The Republic Of Ireland

Roro Freight Traffic (Freight Units) By Corridor¹⁹

	2008	2009
Irish Sea Northern Corridor	799,519	745,461
Irish Sea Central Corridor	720,890	638,094
Irish Sea Southern Corridor	134,271	102,725
Continental Direct - Rosslare	22,190	30,969
Continental Direct - Cork	1,001	1,199
Total Roro traffic	1,677,871	1,518,448

Note:

In the years above Rosslare Europort was the only Irish port on the Irish Sea Southern Corridor.

¹⁹ Data on Southern Corridor Irish Sea and Continental Direct-Rosslare sourced from internal Rosslare Europort records, other data sourced or derived from Table 17, page 23, Irish Maritime Transport Economist, published by IMDO Irish Maritime Development Office, April 2010.

Schedule E: Statistics Of International Passenger Traffic To/From The Republic Of Ireland

Passenger & Car Traffic By Corridor²⁰

Passengers	2007	2008	2009
Irish Sea Northern Corridor	1,997,666	1,850,646	1,901,759
Irish Sea Central Corridor	1,897,037	1,770,186	1,766,586
Irish Sea Southern Corridor	875,807	810,299	748,205
Continental Direct - Rosslare	200,606	192,638	200,657
Continental Direct - Cork	70,405	76,558	61,681
Total Roro traffic	5,041,521	4,700,327	4,678,888

Passenger Cars	2007	2008	2009
Irish Sea Northern Corridor	482,301	539,420	515,490
Irish Sea Central Corridor	394,262	488,609	511,887
Irish Sea Southern Corridor	200,780	250,472	240,258
Continental Direct - Rosslare	63,668	63,020	64,140
Continental Direct - Cork		21,480	17,860
Total Roro traffic	1,141,011	1,363,001	1,349,635

Note:

In the years above Rosslare Europort was the only Irish port on the Irish Sea Southern Corridor.

²⁰ Data on Continental Direct-Rosslare sourced from internal Rosslare Europort records, other data sourced or derived from Table 18, page 24, Irish Maritime Transport Economist, published by IMDO Irish Maritime Development Office, April 2010. Note that IMDO gives no figures for passenger cars on the Continental Direct Corridor for 2007, although it is believed that there was some traffic.

Schedule F: The Environmental Effects Of A Traffic Shift From UK Landbridge To Continental Direct Corridor

The Marco Polo Calculator 2010 was used to calculate the environmental savings which would be achieved by transferring one truck & load (total 40 tonnes) from the Irish Sea Central Corridor Landbridge to the Continental Corridor via Rosslare Europort. The journeys tested all started in Dublin City Centre and were to a range of typical European roro destinations.

The results were as follows:

<i>Destination</i>	<i>Savings Per Truck</i>
Prague	€ 51.59
Vienna	€ 51.59
Milan	€302.19
Paris	€372.19
Madrid	€699.79

The input data²¹ was as follows:

Road Distances

From	To	Kms
Dublin City Centre	Alexandra Road	10
Holyhead	Dover	581
Calais	Prague	1104
Calais	Vienna	1312
Calais	Milan	1097
Calais	Paris	296
Calais	Madrid	1567
Dublin City Centre	Rosslare Europort	158
Cherbourg	Prague	1393
Cherbourg	Vienna	1601
Cherbourg	Milan	1207
Cherbourg	Paris	356
Cherbourg	Madrid	1393

Sailing Distances

From	To	NMs	Kms
Dublin	Holyhead	58	107.4
Dover	Calais	22	40.7
Rosslare Europort	Cherbourg	305	564.9

²¹ Road distances were obtained from www.viamichelin.com, and sailing distances from www.distances.com.