

1. 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?

General principles and criteria for the core network are adequate. However, as a weakness, we believe that market considerations are not given enough importance and should be considered as a key parameter. Our main concern is to ensure that the final selection of the main nodes does not conflict with the market reality.

For this reason we believe that the methodology used for selecting the main nodes and outline the future network should be built upon the following principles:

- Include all maritime cargo: both I/E and transshipment
- Align with the reality of maritime traffic: reflect real maritime routes and main hub ports, such as Valenciaport in the Mediterranean
- Include future areas of growth with strong impact in the European demand for transportation and trade routes such as Eastern Europe and North Africa Countries
- Align with real cargo origins and destinations in the hinterland: incorporate GDP, consumption, population, export commerce macro-magnitudes per area in the hinterland to obtain inland main nodes
- Reflect the reality of hinterland infrastructures: road, logistics platform, rail, etc. In this regard we consider the great rail freight axis Scandinavia-Rhine-Rhone-Western Mediterranean a top priority

2. To what extent do the supplementary infrastructure measures contribute to the objective of a future-oriented transport system, and are there ways to strengthen their contribution?

The supplementary measures should be more specific. In this regard, for example, specific systems should be specified for each of the ITS services outlined including Port Community Systems.

Measures regarding the current state of railway in Europe, railway transport of goods sector and liberalization of the market in order to provide a competitive service.

In addition, the objectives regarding technological efficiency are vague and imprecise. A better segmentation of these objectives in terms of contribution of innovation to economic, social, energetic and environmental efficiency should be defined.

3. What specific role could TEN-T planning in general play in boosting the transport sector's contribution to the "Europe 2020" strategic objectives?

As an integral role in the planning of the future transport network, TEN-T should provide specific measures and key indicators to facilitate the follow up of the plan and the implementation of corrective measures if there are deviations.

Specifically, the TEN-T planning should identify which actions would contribute to the Europe 2020 strategic objectives: The Short-Sea-Shipping remains a key area for dealing with Europe's traffic congestion and it is considered important for the Environmental Policy of the European Union on transport, some of the Europe 2020 strategic objectives, focusing on reducing emissions of CO₂. Motorways of the Sea (MoS) plays a vital role in trade exchanges and reducing emissions of CO₂. Valencia is a region with a great deal of potential for MoS, offering real possibilities for an intermodal logistics chain based on the maritime mode. The Commission should raise new procedures in relation to the award of MoS and reduce bureaucracy in the process.

4. In which way can the different sources of EU expenditure be better coordinated and/or combined in order to accelerate the delivery of TEN-T projects and policy objectives?

5. How can an EU funding strategy coordinate and/or combine the different sources of EU and national funding and public and private funding?

6. Would the setting up of a European funding network adequately address the implementation gap in the completion of TEN-T projects and policy objectives?

A stronger coordination among EU funding sources would be advisable to ensure that priority projects, those main nodes/infrastructures that contribute the most to the EU objectives, have adequate funding to be developed on schedule.

The prioritization of the funding should be done according to the measured value and the contribution to the objectives. In this regard, an adequate measurement of the total value generated per each project and its impact in achieving the EC and TEN-T objectives should be the basis of the new funding system. This measurement should be aligned with market criteria.

In addition, a identification of the total funding obtained per each node/infrastructure should be advisable in order to ensure an equal treatment and make sure that the key infrastructures needed to meet the objectives obtain funding.

In this regard, for its contribution to the decline of CO₂ emissions and to other key strategic objectives in Europe 2020, we consider both Motorways of the Sea and the great rail freight axis Scandinavia-Rhine-Rhone-Western Mediterranean intermodal priority projects.

Finally we are totally aligned with a higher usage funding through public-private partnerships, which should be a major resource in regard to mobilize funds towards infrastructure investments.

7. In which way can the TEN-T policy benefit from the legal instruments and provisions as set out above?

We believe the regulation should ensure that the main nodes and infrastructures do not loose competitiveness and receive an equal treatment. In this regard, the new regulation should clarify the role of the member states in the implementation of TEN-T projects and give more importance to the opinion of the regional and local governments.

