Consultation on the Future Trans-European Transport Network TEN-T

Viewpoint of Finland

General

Finland considers that the revision of the TEN-T network is justifiable. The proposed dual-layer approach in network planning is appropriate. This approach secures intermodal cooperation and makes the comprehensive use of transport system resources more efficient. Focusing on all modes of transport and intermodality as well as laying emphasis on intelligent transport systems will support transport system-oriented thinking.

Goals and methods to be applied in both layers of planning, which are linked to the high level objectives of the TEN-T network, such as territorial cohesion and economic development, are presented in the consultation document. However, the goals presented in the consultation document still need to be supplemented for certain aspects so that they could be used in network planning and selection of development projects. Particularly, goals related to efficient transport operations and traffic safety as well as securing regional accessibility should be specified. Development of connections to third countries has neither been sufficiently addressed.

Planning of the comprehensive network

Finland considers that the proposed planning approach regarding the comprehensive network is a good starting point. The current network should be primarily used in the planning of the comprehensive network and possible network extensions should be based on thorough consideration and actual needs of freight and passenger transport.

Essential connections from regions to the core network and neighbouring areas as well as regional and local circumstances and exceptional features between different regions in the EU should be considered in the planning of the comprehensive network and in determining the extent of this network.

Planning of the core network

Finland considers that the main shortcomings in the consultation document are related to the planning principles of the core network. The methodology for planning the core network should be transparent, open-minded and balanced. According to the cohesion principle, the core network should cover the whole EU area and connect important nodes in every part of Europe, not only on connections having the most significant traffic volumes.

It is presented in the consultation document that the starting point for planning the core network is to identify the main nodes. Thus, the significance of identifying the main nodes is high, as they determine the basic structure of the network configuration. However, it is not clearly described in the consultation document, how the main nodes will be identified. The main nodes will be, for example, the capitals of the Member States, other cities or agglomerations of supra-regional importance in administration, economy, social and cultural life and transport. The presented methodology is, however, overly focused on passenger traffic, while freight traffic should be considered in more detail. Freight traffic is of great signifi-

cance for internal market operations and the competitiveness of Europe. Therefore, the most significant industrial areas should be regarded as nodes in the planning of the core network. In this context, the importance of the northern transport routes can be emphasized, as they enable undisturbed raw material supply to the European markets.

Finland underlines that the significance of traffic volumes should not be overemphasized in the planning of the core network. Using traffic volumes as criteria for Finland and other peripheral countries, where traffic flows are smaller compared to the central areas of the EU, would probably mean that a very small part of the transport network in these countries will be part of the TEN-T core network in the future.

Severe and exceptional circumstances due to northern location and special requirements for the development of transport connections emphasize the need for an adequately dense network. This will secure the level of service of the network, enable flexible and alternative transport routes and cost optimisation based on transport needs. Flexibility and optimisation indicate energy efficiency and are desirable with regard to climate policy.

Connections to metropolises locating in the immediate vicinity of the outer borders of the EU should also be considered in the identification of nodes. These metropolises constitute distinct nodal points of the transport system and their impact area also clearly extends out to the EU area at every level of the transport system (for example St. Petersburg).

Besides traffic volumes, other criteria should also be used in the planning of the core network. Not only the congestion and other problems in the core areas of the EU, but also the transport problems in the peripheral countries of the EU should be considered in the identification and development of the TEN-T network. The most significant problem in the peripheral countries is the long distance to the main market areas of the EU. Therefore, accessibility should be an important criterion in the planning of the core network.

Moreover, it is important that icebreaking will also in the future TEN-guidelines be considered as part of infrastructure, which will promote efficient sea transport solutions in and enables accessibility to the northern areas.

In some cases, planning of the core network based on identifying the main nodes may actually be too narrow of an approach. For example, raw material transport flows from Northern Finland and the whole Barents Area to the main market areas in Central Europe use different routes and terminals (or nodes), and these transport volumes do not necessarily reach the dimensions of transport flows on EU's main routes. Regardless, these northern routes are of high strategic importance to the EU. The identification of corridors would be an alternative or supplementary method to identifying the main nodes. A specific corridor would be the backbone of a transport infrastructure system and include all traffic flows regardless of what would be the single most important node in the corridor. With regard to peripheral areas, it could be more reasonable to identify the corridors to be included in the core network than determine the single most important nodes.

The core network should secure the significant passenger and freight transport flows between different parts of Europe and to third countries. Border crossing points should be regarded as critical bottlenecks for the European economy. It can be considered an obvious shortcoming, that in addition to the future trans-Mediterranean network, the consultation document does not contain any reference to the Northern Dimension Partnership for Transport and Logistics (NDPTL), which was founded by 11 countries. This partnership is significant especially in the

operating environment of the northern countries and Baltic Sea countries, and in the development of the internal market of the EU. The partnership is further emphasized by, for example, the strategic study by the Commission on the significance of raw material supply for the long-term competitiveness of the EU (the Raw Material Initiative).

Innovative infrastructure measures

Supplementary infrastructure measures will significantly contribute to, and will even be a precondition for achieving the goals of a future-oriented transport system. Innovations of intelligent transport system are necessary and well-justified to be included in the core network.

Intelligent transport systems will provide potential alternatives to large infrastructure investments responding to the growth in traffic demand, and in this way they will create new opportunities, for example, for the prevention of climate change. In addition, rapid technological development provides an opportunity to develop new types of services and in various ways to influence and manage traffic demand (for example through pricing). Encouragement to new innovations will continuously contribute to the development of modern, more powerful and more economical measures to meet the challenges of the transport system.

Implementation of the TEN-T network

TEN-T policy is an important part of the EU transport policy. Active implementation of TEN-T networks would be one possibility to achieve the goals presented in the Europe 2020 Strategy.

Funding has a central role in the implementation of the TEN-T network. Funding should be examined and developed based on long-term approach. Finland supports the principle presented in the consultation document, according to which the planning of the revised TEN-T network will be accompanied by a process of optimisation and impact assessment of the projects, which receive TEN-T support.

Even better coordination of the sources of EU funding can also be justified. Finland considers that all instruments of funding (including user charges) should be explicitly examined. The significance of cooperation projects between the public and private sectors will increase in the future, and thus the development of this financial instrument should be emphasized even more.

It is presented in the consultation document that the Commission will aim at providing guidance to the national funding of the Member States in the future or even combine the different sources of EU and national funding. Finland has a hesitant attitude towards this issue.

Regarding the legal and institutional framework of the TEN-T policy review, Finland agrees with the proposals presented in the consultation document, which aim at simplifying the EU regulatory framework. However, it is emphasized in Finland that the scope of national decision making in the Member States should not be limited when the legal basis is amended.