



**DET KONGELIGE
SAMFERDSELSDEPARTEMENT**

Ministry of Transport and Communications

European Commission - DG Mobility and Transport

BE-1049, Brussels
Belgium

Your ref

Our ref
09/1912- LL

Date
14.09.2010

Norwegian comments on consultation on the future trans-european transport network policy

Dear Sir/Madam,

Reference is made to COM (2010) 212, published 5 May 2010.

Norway welcomes the opportunity to contribute in the consultation process. The TEN-T policy review is of direct relevance to Norway since the guidelines are incorporated in the EEA-Agreement.

In general, Norway supports the proposed modernisation of the TEN-T policy, with focus on addressing environmental and climate change challenges, eliminating critical bottlenecks in the transport system, increasing intermodality and improving the systems resource efficiency.

Dual layer planning approach - connections to core- and comprehensive network

We welcome the dual layer planning approach, with maintaining a dense Comprehensive network and overlaying this with a Core network as the top layer.

It is however, of vital importance, especially for countries situated in the outer regions of the Internal Market, that focus remain also on establishing and developing a well-functioning comprehensive network, to ensure sufficient and effective connections between the two layers, and thus contributing to the added value of both the comprehensive and core network.

Improved accessibility and seamless connections are basic preconditions for enhanced competitiveness for countries with location in the periphery of Europe. The new TEN-T policy should therefore explicitly recognize the special challenges and needs of peripheral areas with long transport distances and relative low transport volumes to centrally located markets. Special attention should accordingly be given to linking infrastructure in EEA-countries, as participants in the Internal Market, to both the comprehensive and core network, to ensure effective access to and from the central markets. In this context we emphasize the significance of the existing priority projects of special importance for us, like the Nordic Triangle and the Fehmarn Belt-axis. The Nordic Triangle is a good example of well connected cross-border project.

The extension of TEN-T networks to neighboring countries is also important as a tool of stimulating cooperation and facilitating trade and growth in a wider European context. The development of transport connections with Russia, is considered especially important as the East-West transport flows are growing fast. Facilitating cross-border connections can be considered a key element for further development in the Northern Dimension region. Seen from our perspective the Northern Axis, including the prospects of developing a land transport corridor linking neighboring countries like Norway, Sweden, Finland and Russia, represents an important future oriented transport corridor. Furthermore, improved east-west land transport connections could also stimulate development of alternative maritime transport routes and connections.

The partnership of transport and logistics within the Northern Dimension will be a good platform for developing relevant transport corridors. We believe such a regional partnership will result in better coordinated and faster implementation of projects of common interest between EU-Member States and neighboring countries in the High North and the Baltic Sea region.

Improved integration of modal and intermodal networks

Norway fully supports a strengthened approach of modal shift to more environmentally friendly modes, establishing “green transport corridors” and dedicated freight networks, and thus realizing the full advantage of the environmentally friendly modes of sea and rail transport. Furthermore we support measures to optimize the use of all modes of transport, individually or in combination by facilitating the passage from one transport mode to another. Consequently, we welcome the proposed general principles for designing TEN-T at all strategic levels.

Norway as a sea-oriented country welcomes further efforts to promote Motorways of the Sea as an attractive alternative to road transport, while avoiding distortion of competition for existing maritime transport service providers.

The future infrastructure policy should stimulate and support the development of a MoS Barents Sea and linking it with the MoS of the North Sea and the Baltic Sea.

Norway acknowledges the importance of effective ports and of intermodal facilities and suggests that this should be enhanced to comply with the Green corridor concept including use of LNG (Liquified Natural Gas). With reference to the new regime adopted in IMO regarding polluting emission from ships, Emission Control Area (ECA) regulations will be introduced in 2010, 2015 and 2016 in the North Sea, the Baltic Sea and the English Channel for regulations of sulphur- and NOx-emissions. LNG as fuel for ships is a solution that has great advantages among available means and in compliance with the upcoming ECA requirements. The environmental effects by using LNG are elimination of sulphur emission and particle matters, in addition to substantially NOx-emissions and significant CO2 reductions.

Funding

Since Norway does not participate in the financial mechanism of the TEN-T program, our prioritization of projects, financing and implementation are fully based on national decision-making. However, when it comes to cross-border infrastructure development, there is a tradition of exchange of information and co-operation with our neighbors. The new TEN-T policy should stimulate such coordination processes, including exchange of best practices on a broader scale.

We support, however, the Commission's view on the funding strategy where all possible EU, national and private finances should be streamlined in order to better achieve the objectives set out in the Guidelines, and the use of assessments based upon consistent and reliable data and agreed methodologies to identify TEN-T projects of high European value.

Legal aspects

The existing Guidelines have been incorporated in the EEA-Agreement. The financial mechanism of the TEN-T program is however, not part of the Agreement. Therefore we would like to underline that the proposed approach of combining the Guidelines and the TEN Financial regulation in a new regulation as the common legal act, will represent a technical challenge in the context of implementing the new Guidelines in the Agreement.

We note that Norwegian TEN-T infrastructure has been removed in the existing maps showing the TEN-T system. With reference to the fact that the Guidelines and other relevant legal acts already are a part of the EEA-agreement, and that Norwegian infrastructure are a part of the TEN-T system, including the priority project Nordic triangle, we kindly ask the Commission to re-enter the Norwegian TEN-T-infrastructure in the forthcoming update of the relevant maps. In order to supply the Commission with the necessary information to update the maps, we will evaluate the extent of the

existing "comprehensive" Norwegian TEN-T net, and look forward to a dialogue with the Commission in this process.

Yours sincerely,


Kjell Rosanoff


Lasse Lager