

Position Paper

16 September 2010

AEA RESPONSE TO THE CONSULTATION ON THE FUTURE TRANS EUROPEAN TRANSPORT NETWORK POLICY (Ref COM (2010) 212 final)

1. INTRODUCTION

AEA welcomes the opportunity to comment the TEN-T policy review. AEA agrees with the Commission in that the TEN-T policy should be modernised for the European Union to better harness its resources for the implementation of strategic projects with high European added value to address critical bottlenecks in the smooth operation of the internal market, in particular cross-border transit and inter-modal transfer.

We would like to take this opportunity to emphasise once again the importance of aviation, which is the only mode which links the whole of the EU, the periphery with the centre, the regions with each other and the whole with the rest of the world. This should be reflected in the proposed future TEN-T planning: the aviation industry is essential in leveraging the advantages of dual layer planning (core network and the comprehensive network).

2. THE GREEN PAPER FOLLOW UP

AEA participated in the consultation process on the Green Paper on the future development of the trans-European transport network, where – in the reviewed TEN-T guidelines – the importance of aviation was recognised as a priority for the social cohesion and integration of the European Union. In addition, AEA believes that the Trans European Networks programme (TENs) quite properly recognises the importance of borderless infrastructure for an integrated Europe. The objectives of the TEN-T programme, as regards European jobs and competitiveness, clearly require it to incorporate an external dimension, as for a long-term sustainable transport policy to be successful it also needs to take into account the international competitiveness of Europe vis-à-vis other continents and regions.

AEA has also participated in the expert groups advising the Commission in developing a methodology for the planning of the future TEN-T priorities and implementation.

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3. METHODOLOGY FOR TEN-T PLANNING

Are the principles and criteria for designing the core network, as set out above, adequate and practicable?

AEA recognises the potential advantages of dual layer planning, working at two different levels in response to the different needs of the main modes, taking into account both urban and dispersed populations, the connectivity requirements among the main modes (intermodal hubs) as well as with other regions and countries (interoperability).

What are their strengths and weaknesses, and what else could be taken into account?

AEA believes that for a **Comprehensive Network** to fulfil the envisaged objectives it should, as already identified by the Commission, link all EU regions, be multimodal and provide infrastructures for co-modal services, covering future elements of the core network.

Ensure accessibility to the core network: To ensure a truly social cohesion, the population in peripheral areas should have access to the main nodes of the network. In an area of 4 million km², it is aviation, more so than rail or road, which makes the greater contribution to social cohesion and integration. Furthermore, aviation feeds flows of traffic from other regions as well as from peripheral areas into the core network and therefore, helps the comprehensive network to *contribute to the core network*.

The planning of the comprehensive network *should promote accommodation of technical standards for modal integration and co-modality*. This is of special relevance for the main air transport common project, given the global nature of aviation. SESAR, the modernisation of the European Air Traffic Management, is vital to ensure a modern, high performing, interoperable, sustainable European ATM, in support of a more efficient network. Interoperability throughout Europe and with other parts of the world should be a priority for the future planning of the TEN-T network.

Regarding the planning principles to be applied to the **Core Network**, AEA welcomes the Commission's opinion that it *must cover all modes of transport*. In the past TEN-T projects have seen a preponderance of rail and road development programmes.

The future TEN-T core network *must include ITS*. The modernisation of the European ATM technology is largely based on Intelligent Transport Systems that adapt to the needs of the users and optimise the available technology. Only by recognising the strategic importance of ITS in the planning of the network can the full benefits of the future TEN-T be achieved.

AEA also welcomes the principle that the core network *should be linked with infrastructure in third countries*. As already mentioned, the modernisation of ATM in

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Europe will require an evolution towards ITS, the technology installed on board the European fleets must be aligned, interoperable with the technology required in third countries, to avoid duplication of (costly) requirements for international operations.

With regard to the **General Principles for designing TEN-T at strategic levels**, AEA would like to emphasise the importance of *intermodality*, for aviation to truly contribute to the development of a sustainable Trans-European transport network, the facilitation of co-modality is of key importance. Therefore TEN-T should not only promote the physical development of *intermodal links* (including cargo) but also the *multimodal integration* – mainly through common *ITS developments and application of advanced technologies* – to achieve true Interconnectivity, interoperability and improved efficiency.

Safety and security must be overarching principles in the planning of any of the two levels of the network, for both passengers as well as cargo.

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

The proposed steps for planning core network as presented in the paper seem a very sensible way to ensure that supplementary infrastructure measures contribute to the efficient development of the network. AEA would like to highlight the importance of the last two for ensuring that resources are efficiently deployed, avoiding a patchwork of technical parameters and infrastructure applied differently throughout the network.

3. Determining the relevant technical parameters to be applied, according to functional and capacity needs.

4. Including relevant complementary or auxiliary hard or soft infrastructure, so as to meet the requirements of operators and users, in line with specific policy objectives, and to enhance efficiency and sustainability.

AEA supports that the need for removal of *bottlenecks affecting long distance and international traffic flows* should guide the dimensioning and equipping of the network elements.

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

As mentioned in the previous TEN-T consultation, the fundamental four freedoms which define the Common Market all contain the word ‘movement’ – of people, goods, capital and services – which places Transport at the core of a properly functioning EU.

ITS, innovation and new technologies’ importance for the future TEN T network must be recognised, in view of the future development of the transport sector. ITS and advanced technologies must support the achievements of a safe, secure, seamless, sustainable and efficient transport system in Europe, so as to boost internal market efficiency.

AEA believes that, as identified in the consultation paper, criteria to identify infrastructure-related measures to support EU policies should be based on *performance and quality objectives*. Nevertheless it recognises that policies evolve with time, therefore *flexibility* should be left to adjust the criteria and for that reason, instead of identifying the criteria at this stage, AEA welcomes the proposal to define *process for identifying such criteria* adapting to evolving needs.

Infrastructure-related projects that contribute to achievement of EU objectives should be clearly identified as TEN-T projects of high European added value for the TEN-T core network, and priority for funding should be allocated, to ensure the speedy delivery of the benefits foreseen for such projects.

With respect to the decarbonisation of transport, AEA strongly believes that TEN-T projects should be dedicated to research and development of sustainable and alternative fuels, so as to facilitate further growth of the aviation industry without increasing the pressure on the current limited infrastructure capacity.

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4. TEN-T IMPLEMENTATION

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?

As mentioned in the above questions, projects that contribute to achievement of EU objectives should be clearly identified as TEN-T projects of high European added value for the TEN-T core network, and priority for funding should be allocated, to ensure the speedy delivery of the benefits foreseen for such projects.

In this regard AEA would like to bring to the attention of the Commission the text of a recent resolution from the European Parliament, adopted on July 6th, on the sustainable future of transport¹ in which aspects of relevance for the achievement of a sustainable transport in Europe are identified.

Completion of the single market

20. Underlines, with regard to the economic requirements, the importance of genuinely European management of transport infrastructure (freight and passenger rail transport corridors, Single European Sky, ports and their connections with the transport network, maritime area without borders, inland waterways) with a view to eliminating the "border effect" in all transport modes and enhancing the EU's competitiveness and appeal; [...]

23. Considers that, in order to achieve greater effectiveness in transport policy, there is a need to evaluate programmes (such as Galileo and ITS for all transport modes) and, depending on the results, strategy and programming should be reoriented as appropriate; sees a consequent need for, among other things, a new road traffic safety programme, further revitalisation of the TEN-Ts, a mid-term review of NAIADES, the urgent and full implementation of the Single European Sky programme, SESAR and the Eight Framework Programme for Research and the continuation of Marco Polo in a simplified form; [...]

Research and technology

28. Emphasises that research and development and innovation require support, since they lead to considerable environmental improvements in all transport modes due to a reduction in exhaust gases and traffic noise, improve safety by creating solutions to ensure better use of existing infrastructure capacity and to reduce traffic bottlenecks, and, not least, result in increased energy independence across the modes in the entire transport network; stresses in this respect that intelligent, interoperable and connected transport organisation and safety systems, such as ERTMS, Galileo, SESAR, ITS and equally appropriate technologies, require support in terms of research and development as well as in their application; calls on the Member States to ensure that all citizen across Europe benefit from these intelligent transport systems; notes that the necessary framework conditions and open standards must be introduced for promising technologies, without giving an undue advantage to any specific technology;

¹ <http://www.europarl.europa.eu/sides/getDoc.do?type=TA&reference=P7-TA-2010-0260&language=EN&ring=A7-2010-0189>.

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AEA would like, once again, to reiterate the critical importance of ATM for the transport network, and therefore for the mobility of its citizens, as through the Single European Sky Regulation the Community states it's intention to address the existing shortcomings of the European ATM system.

The Single European Sky is a quintessential candidate for consideration as a truly European project, enhancing mobility and increasing efficiency while maintaining extremely high levels of safety and – of particular relevance to the latest TEN-T guidelines – delivering clear environmental benefits. Modernisation of the European ATM technology through the SESAR programme, the technological arm of SES, is vital to ensure a modern, high performing, interoperable, sustainable European ATM, in support of a more efficient network.

Furthermore, AEA would like to highlight the importance of the TEN-T network planning for an effective greening of European Transport.

Of particular importance will be the introduction of alternative fuels (Biofuels) which will require not only research and development on the candidate fuels, but also a large infrastructural adjustment in the distribution points (i.e. Airports) and distribution means. For the foreseeable future all the alternative fuels for aviations are drop-in solutions, this means that it would be mixed with traditional carbon fuels; for achieving a large-scale introduction of these alternative fuels, means for distributing and measuring their actual usage (i.e. percentage loaded on the tank) will be needed. The infrastructure and logistics that the network provides will have a large effect in the speed and extent of penetration of the alternative fuels in the European Air Transport sector.

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

AEA welcomes the proposal of the European Coordinators for major cross-border projects in developing provisions inviting the Member States to conclude relevant agreements for the funding and implementation of high added value projects. The development of a European funding framework would probably ensure the alignment of policy priorities and TEN-T projects implementation.

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5. LEGAL AND INSTITUTIONAL FRAMEWORK

In which way can the TEN-T policy benefit from the new legal instruments and provisions as set out in the consultation paper?

AEA recognises the potential benefits of common legal act for the guidelines and the granting of finance, which could help to ensure the best possible use of the EU financial contribution so as better to achieve the objectives set out in the guidelines by strengthening the link between TEN-T policy priorities and financial resources.

A clarification of responsibilities of Member States, from the planning to the implementation and financing of projects, would ensure a holistic approach to the achievement of the objectives of TEN-T network planning.