

## **The European Voice of Freight Logistics and Customs Representatives**

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Brussels, 6<sup>th</sup> of September 2010

### **RE: Consultation on the future trans-European transport network policy**

CLECAT represents the interests of the vast majority of EU logistics, freight forwarding and Customs service enterprises ([www.clecat.org](http://www.clecat.org)). As such it is the largest umbrella organisation of its kind in the EU, structured as an international non-profit association, registered in the EU Register of Interest Representatives from its very inception. Our geographical scope is limited to the EU and the neighbouring countries.

CLECAT would like first of all to express its general appreciation for the direction embraced by the European Commission as regards the future TEN-T policy. We are pleased to see a clear preference toward the option of a dual layer in the planning approach with a core network within a more extended and comprehensive network. This was the preferred option for CLECAT as well as many other stakeholders during the previous consultation process (on the green paper<sup>1</sup>). We are confident that on the basis of the evaluations and the results obtained, the Commission will be able to achieve a consistent and satisfying re-modelling of the TEN-T system, in line with the new geographical scope of the EU and its neighbouring policy.

We would like to express our views in this position paper by referring to the online consultation released by the Commission concerning the Commission Working Document: Consultation on the Future Trans-European Transport Network Policy (COM(2010)212<sup>2</sup>).

#### **➤ THE METHODOLOGY FOR TEN-T PLANNING**

##### **• *Planning the comprehensive network***

CLECAT overall agrees with the comments written by the Commission, concerning the comprehensive network. We would however like to give additional comments about the following particular points that are mentioned in the Commission's working document:

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<sup>1</sup> <http://www.clecat.org/dmdocuments/pp008osecr090427greenpapertent.pdf>

<sup>2</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2010:0212:FIN:EN:PDF>

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The various needs that have been identified in planning the comprehensive network<sup>3</sup> may not play an equally strong role in policy strategy, which would suggest the need to establish priorities between them, albeit even when politically unpalatable. The ambition to achieve a comprehensive network should not be confused with an inconclusive caucus of proposals without practicality. Priorities must be identified and negotiated in order to achieve the creation of an efficient TEN-T network. CLECAT would like to highlight in particular the importance of strengthening and enlarging the scope of the reference beyond relevant EU relevant environmental legislation. Economic growth and employment are as important as environment issues with regards to the TEN-T policy, which is about cohesion and integration (including connecting productive settlements that are located in environmentally protected areas). Striking the right balance between development and environment is crucial for the future of the EU and our decision makers must realise the full span of this challenge. A wise planning of continental corridors must come to some trade-offs between environment and development, by ensuring that the possible environmental impact observed in the development and the enlargement of a corridor is counterbalanced by appropriate environmental trade-offs in other areas, where more space is available.

On the planning process of the comprehensive network, CLECAT would like to highlight that it fully agrees with the Commission that it should "link all EU regions in an adequate way, be multimodal and provide the infrastructural basis for co-modal services for passengers and freight". On this last point, we remind the Commission of the importance not to set up a network that imposes systematic priority of passengers over freight services. Freight must be delivered on time as agreed with customers, and the importance of the efficient supply to our market must be understood in its pivotal importance. For this reason passenger services should not be given automatic priority, especially when it is not strictly necessary. The future TEN-T policy must fight against rail freight being confined to secondary choice for customers. Rail freight should be treated as efficiently as any other type of freight, without suffering from the sort of self-imposed constraints that are amongst the reasons for rail freight's decline in the last two decades (this being said, CLECAT participated to the TEN-T Days 2010 in Saragossa and we were pleased to see that freight was being debated with the same attention as passengers during the event<sup>4</sup>).

CLECAT is pleased to see that the Commission explicitly points out that it is important to develop a homogeneous network planning to reduce missing and isolated links. The TEN-T needs an overall strategic vision, rather than what has been a patchwork of individual projects that might fail to become interconnected.

CLECAT is pleased to see that the Commission explicitly recognises the role of the comprehensive network to guarantee important implementation progress on Community legislation in transport (e.g.: rail interoperability) and other sectors. As we mentioned during the previous consultation, it is very important that future legislation on TEN-T policy should not be just one more EU instrument among others for transport but should instead go further and contribute to unify the overall picture of freight corridors within a coherent strategic vision. We would like to highlight for instance the opportunity that the TEN-T represents in making freight

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<sup>3</sup> *"a reference for land use planning; a geographic reference for other policies; a reference on the requirements of the relevant EU environmental legislation and policies, in particular on the protection of biodiversity; a target for technical and legal requirements on interoperability and safety; the accommodation of technical standards to enable effective modal integration with the aim of door to door co-modality". (page 4)*

<sup>4</sup> Speech of CLECAT Director General Marco Sorgetti during the TEN-T conference in Saragossa:

<http://www.clecat.org/dmdocuments/ps004osecr100610ten-tdays.pdf>

CLECAT written contribution: <http://www.clecat.org/dmdocuments/PP008OSECR100531TEN-TSHConsult.pdf>

transport users benefit from an efficient deployment of the ERTMS technology and of the green corridor concept.

- ***Planning the core network***

CLECAT agrees on the overall definitions and role of core network and nodes highlighted in the working document drafted by the European Commission. We also agree with the Commission that the future TEN-T policy should contribute to having better interconnections between bordering Member States and neighbouring third countries. Indeed, a coherent TEN-T development with the EU enlargement policy would certainly foster the development of transport infrastructure of EU neighbours.

As regards the TEN-T policy objective of planning a core network, some consideration is necessary when dealing with the following concept: *"Planning a core network is not meant to initiate a new infrastructure programme of immense scope neither: ensuring continuity for ongoing projects, giving due attention to the removal of key bottlenecks and building largely on existing infrastructure, it aims at becoming the basis for an efficient, less carbon intensive, safe and secure transport system"* (page 5). The TEN-T policy related measures must be given the political power to become incisive in the removal of bottlenecks and should not be refrained from identifying the need to build new or update existing infrastructure, where needed. In order to reach the objectives of a future-orientated transport system, CLECAT believes that a corridor policy may be an exceptionally useful instrument in overcoming the obstacles that a persisting national perspective tends to maintain in EU policy choices and in dealing with the issues of *"monetising non-monetisable effects such as cohesion"* and balancing *"conflicting objectives"* (page 8).

CLECAT is pleased to see the Commission's concern to meet the requirements of users when designing the core network (page 7) in order to enhance efficiency and sustainability of TEN-T. We would like to add that the EU will no doubt benefit from the active involvement and agreement of the freight customers in the TEN-T planning process, who are best placed to give advice on present and future demands. For that reason, the setting up of TEN-T policy and TEN-T projects should involve all the concerned actors, i.e. not only of the infrastructure managers and transport companies but also the users of the TEN-T. This is not the first time the Commission could use a stronger hand in promoting the interests of the users, even if no passengers are involved. When the promotion of the interest of all users is supported by the Commission, this can never be too early.

CLECAT is also pleased to see that the issue of urban nodes is mentioned in the working document (page 7). We would like to insist on the importance of urban nodes in the future TEN-T policy because it is a component of the logistics chains that should not be left aside of the TEN-T network. It is useless to have an efficient network if problems are still encountered in the last mile of delivery. On this point, access to terminals in the TEN-T network should be more transparent concerning national safety rules as well as track access and charges.

In principle, CLECAT would agree that detours may be necessary for the TEN-T network to meet traffic needs, to be economically viable and to take into account the environmental aspects, as mentioned on page 7. It is however important that these detours represent efficient alternatives for customers, i.e. that the itinerary is well planned and guarantees punctuality as reliability is essential to assure the successful use of TEN-T. A detour is always in principle less efficient than a straight line, hence pro's and con's must be carefully appraised in the present and future traffic demand perspective.

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We support the Commission when it says that current priority projects will be a key part of the core network (page 8), but adjustments are not enough. As we said previously, the vision of these priority projects must literally change from individual projects to a systemic approach in order to ensure a more adequate and successful functioning of the core network. It is only natural that the EU institutions focus should concentrate on the cross border areas, considering individual Member States are best placed to promote their national projects, which should be substantially financed by individual national budgets.

- ***Innovative infrastructure measures***

CLECAT agrees that flexibility in important development criteria over time are adapted to future policy developments and based upon performance and quality objectives for all the transport modes and their intermodal integration (page 8).

We also agree with the content relating to ITS on page 8 and would like to stress the importance of infrastructure advances for energy provision for transport. We would also like to take the opportunity to recall the opportunity that the TEN-T offers for reaching the objectives of a future-oriented transport system by promoting the rapid development of the e-freight agenda into a true intermodal cross border system for paperless freight.

In this connection, it is worth mentioning the existence of a dedicated advisory body in CLECAT (which is supplemented by the necessary aid coming from FIATA, [www.fiata.com](http://www.fiata.com)). This is a resource made available to CLECAT members as well as third parties and institutions that may help in the progress of the e-freight agenda.

➤ **TEN-T IMPLEMENTATION**

- ***Assessment, prioritization and non-financial instruments***

The division of funded projects between the study research phase and the real infrastructure building would allow a fairer and adequate distribution of financial funds among TEN-T projects and reduce the risk of endless preparation without any material achievement. Such a procedure would therefore certainly contribute to accelerate the delivery of TEN-T projects and objectives.

- ***Funding***

In principle, CLECAT has nothing against the idea of setting up a European funding framework to coordinate EU instruments for transport as mentioned page 10. However, this framework must not be a new factor of administrative burden for stakeholders interested in using EU transport funds and must absolutely ensure a fair and strict earmarked distribution of the funds.

➤ **THE LEGAL AND INSTITUTIONAL FRAMEWORK OF THE TEN-T POLICY REVIEW**

The work described in the working document regarding the creation of a new legal and institutional framework of the TEN-T policy review (page 11) should ensure a better communication and awareness of the Commission as regards its work in relation to TEN-T as

well as a more efficient distinction between projects that are vital, others that are necessary and those that are welcome but cannot pass the selection of conflicting priorities we are facing.

CLECAT would also like to suggest that an enhanced role of the TEN-T executive agency in proposing the strategy behind the choices to be made for TEN-T projects could be extremely beneficial, especially if the agency is in tune with the users' requirement by means of their institutionalised participation. Whilst coordination with Member States is indispensable, the voice of users must be heard directly if the prioritisation policy wishes to avail itself of the comfort of a relative consensus building. In addition, the practical approach of the private sector may bring on a proactive attitude, for instance by proposing alternatives for stakeholders to choose from. This latter point connects directly with the policy options that are addressed at point 5 of the working document.

Last but not least, building on past experience should suggest a practical approach to invest the Commission with the authority to deal with the problem of bottlenecks that are often stayed by the lack of funds made available by different MS's or lambasted by numerous uncertainties in political responsibility. Efficiently addressing the problem of persisting bottlenecks would be the individual greatest achievement of the future TEN-T policy without any doubt.

We thank the Commission for their attention and hope that a swift implementation of the many goods ideas contained in the commentaries brought forward by the Commission, seconded by CLECAT and other parties with a view to a successful implementation of the future TEN-T policy.