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North Sea Commission response to CONSULTATION ON THE FUTURE TRANS-EUROPEAN TRANSPORT NETWORK POLICY, COM(2010) 212 final

About the North Sea Commission and the North Sea Region

Founded in 1989, the North Sea Commission (NSC) is one of six Geographical Commissions under the umbrella organisation CPMR (Conference of Peripheral Maritime Regions) whose purpose is to raise the profile of maritime and peripheral regions in Europe. The North Sea Commission was established with the aim of encouraging cooperation and partnerships between the regions around the North Sea, raising the profile of the North Sea region and promoting it as a major economic basin. Currently the NSC has 56 individual members from 7 countries (Denmark, France, Germany, Netherlands, Norway, Sweden, and the UK). See more information on:

<http://www.northseacommission.info/home.html>

The North Sea region is diverse in terms of geography, and is characterised by coastal areas, mountain regions, islands, sparsely populated areas and cities, while also being rich in natural resources such as oil, gas and fish.

The countries around the North Sea (Belgium, Denmark, France, Germany, the Netherlands, Norway, Sweden and the United Kingdom) constitute a potential market of over 252 Million consumers. Industry and consumer demand create huge traffic flows, of both imports and exports which are increasingly using the North Sea. Road congestion in Europe and the established benefits of short sea shipping as a sustainable part of the logistics chain creates demand for the extension of the North Sea short sea network. The North Sea is one of the busiest maritime regions in the world and central to this activity is short sea shipping. In 2006, short sea shipping in the North Sea Region totalled some 599 million tonnes. Regular liner services and ferries operate fast, reliable and flexible connections that carry a wide range of cargos in a wide range of vessels.

Background

This response is building and elaborating on the NSC response to the consultation on the TEN-T Green Paper from April last year. In that response the NSC agreed with the stated needs and reasons for the TEN-T review, bringing the TEN-T more in line with recent development & trends, as well as for strengthening the role of TEN-T in promoting sustainable growth, accessibility and combating Climate Change (CC). We also agreed with the main profile of the Green Paper and in particular highlighted concerns related to cohesion, maritime dimension, external dimension and governance (facilitating involvement of the regions). The NSC response favoured the option of a dual layer structure with the comprehensive network and a core network, comprising a geographically defined priority network and a conceptual pillar helping to integrate the various transport policy and transport infrastructure aspects.

NSC's response to the present consultation has been drafted by the Transport thematic group and validated by the politically elected Executive Committee. The NSC has also contributed to the



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response from the CPMR, and this contribution is in various ways also reflected in our own response. We have furthermore integrated input from the StratMoS project under the Interreg IVB North Sea Region Programme.

General remarks

The NSC welcomes this opportunity to contribute to the development of the future Trans-European Transport Network Policy. We support the broad and integrated approach to the TEN-T policy review, taking into account a variety of aspects such as hard infrastructure, intelligent transport systems, better logistics and decarbonising technologies. The NSC also welcomes the stronger integration of TEN-T policy with the overall transport policy objectives required to match the Europe 2020 agenda.

We are also pleased to see that some of the concerns raised in our response to the Green Paper consultation have been integrated in the consultation document, including a clearer reflection of concerns related to cohesion, links to 3rd countries, and the potential of intelligent transport systems and technological innovation in vehicles and fuels.

Response to consultation questions

The methodology for TEN-T planning

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?

The NSC agrees with the general principles and criteria for designing the core network as listed on p.6 in the consultation document (also listed below). We believe that the main strengths of these principles and criteria are a potential for promoting a coherent and flexible TEN-T network with high European added value, facilitating competitiveness, sustainable development and territorial cohesion. Their shortcomings and weaknesses are listed in the paragraph “what else could be taken into account” below.

General principles

Multimodality, Interconnectivity and network optimisation, Interoperability and improved efficiency of all modes of transport, Sustainability, Attention to biodiversity, A focus on quality of service for both freight users and passengers, Safety and security of transport infrastructure, Application of advanced technologies and ITS, Minimisation of investment, maintenance and operational costs, while nevertheless meeting the relevant policy objectives and the criteria below in a balanced way.

Criteria

such as spatial integration and cohesion effects, internal market needs, external and global trade flows, passenger and freight traffic and customers' needs, inter-connectivity and multimodality of the network, environmental and climate change issues.

However the definition of the core network seems to differ somewhat between different parts of the consultation document (p.3, 1st para and on p.5, under the headline *Planning the core network*). The NSC favors the definition on p.3, 1st para, also explicitly mentioning the support for *economic, social and territorial cohesion*, and underlining that the *core network should not be understood as a network that covers only the geographical core of the Community....*

What else could be taken into account?

In addition to the general principles and criteria listed in the consultation document we believe that the following factors should more clearly be taken into account and given stronger emphasis:

- Accessibility

This concerns the extent to which the core network would integrate and improve the accessibility of peripheral and remote territories with weaker transport flows, fewer route & service options and higher transport costs. We thus believe that peripheral and maritime regions should be well integrated in or have good connections to the core network. It should be taken into account that several nodes and links in these regions could be considered as having “high strategic and economic importance”, and the integration of peripheral regions in the core network would be in line with the statement in the consultation document saying that the *core network should not be understood as a network that covers only the geographical core of the Community*

In this respect we would like to highlight the need for widespread entry points to the Core network especially from peripheral areas. There is also a need for a spatial exercise to identify peripheral locations without easy access to the main nodes (big/capital cities, gateway ports etc), and that the main nodes should have their wider catchment area identified - thereby allowing identification of those areas lying outwith easy connection to the core network.

- Maritime dimension & Motorways of the Sea (MoS)

The maritime dimension is almost invisible in the consultation document and the NSC is calling for a stronger emphasis on maritime transport and Motorways of the Sea in the shaping of the future TEN-T policy. We expect that maritime links will be fully integrated into the core network.

Ports and maritime transport are vital for the competitiveness and sustainable development of Europe but at the same time only account for a small proportion of EU transport infrastructure funding (as compared to road and rail). Maritime links are also much cheaper to provide than land links. There still even today exists an uneven playing field between road and sea transport. A superior, simpler and fairer policy mechanism could be to focus on the internalization of external costs for road transport, aiming at greater cost recovery of infrastructure costs through user



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charging mechanisms. This could help counteract the still substantial user cost gap between road and sea transport

Against this background the NSC would like to consider the introduction of a “maritime earmarking principle” in the future TEN-T policy whereby a certain share of TEN-T investments should be reserved for ports and related maritime transport infrastructure. Funding needs to be available even when the infrastructure is not purely publicly owned in the traditional format. In this respect we are also supporting the idea to allow ship purchases on certain conditions to be co-funded as “mobile infrastructure”, in particular in cases where it’s difficult to create or maintain services to peripheral areas.

Concerning **Motorways of the Sea (MoS)**, we would take the opportunity to again call for stronger emphasis to be put on the cohesion objective of MoS under TEN-T, which in practice is inferior to the modal shift objective. Existing TEN-T guidelines (Articles 12a and 13.1) state that the main objectives of MoS are to reduce road congestion and/or to improve access to peripheral and island regions and States. The use of ‘and/or’ implies that modal shift and accessibility are on an equal footing and that the MoS funding scheme can be used for projects promoting access to peripheral areas even if those projects do not promote modal shift, and vice versa. However, there have been no accessibility-oriented MoS applications to date, and there is in practice a bias towards projects promoting modal shift in the evaluation criteria and checklist for proposals. We suggest that the aim of territorial/ socio-economic cohesion and improved accessibility for peripheral areas requires further definition to enable prospective applicants to adhere to these overarching aims of MoS. The Commission has currently no sufficient framework for assessing the quality of future periphery based MoS applications, and they have no specific criteria for weighing the merits of a periphery based application up against cargo shift based applications

The nodes of the core network should also comprise **dry ports**, understood as a part of a seaports moved some 30-200 km into the hinterland in order to satisfy the customers demand and at the same time to ease operational constraints (e.g. traffic bottlenecks in the main port area). Several container ports around the North Sea encounter problems with the lack of space, queuing times, hampered road access and low share of rail transport mode in cargo supply. For that reason dry ports, located in the proximity to TEN-T links, could offer an additional capacity to the container ports. The Dry port concept is being developed by a project under the Interreg IVB North Sea Region Programme with the same name, see: <http://www.dryport.org/>

- Links to third countries

Although it’s mentioned in the consultation document that “the future TEN-T should be linked in a more strategic way with key infrastructure in third countries”, we believe that links to third countries should also (when geographically relevant) be counted as a *principle / criteria* in the context of the future TEN-T policy.

We furthermore believe that the future TEN-T policy should integrate the 2007 Communication from the Commission on “Guidelines for transport in Europe and neighbouring regions”. Of the five transnational axes identified in this Communication, the NSC is particularly concerned with



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extending the Motorways of the Sea network (from Aberdeen linking with the UK and from the various Benelux ports on the continent) along the Norwegian coast all the way to the Barents Region and North-West Russia, and with the Northern axis connecting the northern EU with Norway to the north.

The development of the Nordic Triangle is furthermore vital to transport and trade in Scandinavia. The port of Gothenburg serves as the main port for import/export not only for Sweden, but is also an important port for Norway.

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?

Supplementary infrastructure measures such as Intelligent transport systems (ITS) and innovations in vehicles and fuels technologies have a potential for optimising capacity of the transport system and paving the way for more efficient, environmental and safer transport solutions. It is therefore important that the future TEN-T core network is fully equipped to facilitate large scale use of clean fuelled vehicles and ships, including bio-fuels, natural gas, electricity (also shore side), and hydrogen.

We also believe that various logistics technologies and platforms should be regarded as *supplementary infrastructure* in the context of TEN-T and thus be eligible for EU funding. This could be methods and tools for facilitating transactions, integration and standardisation of data in supply chains. The three aspects of Identification (e.g. Automatic id and data capture bar codes, RFID – Radio Frequency id), Location (GPS, Galileo) and Communication (satellites, GPRS, WiFi and WiMax) must be integrated effectively. Such logistics technologies are developed and tested within the framework of the StratMoS project (http://www.stratmos.no/stratmos/project/openIndex?ARTICLE_ID=100) and the NS Frits project <http://www.nsfrits.eu/en/> under the Interreg IVB North Sea Region Programme.

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

Europe 2020 puts forward three mutually reinforcing priorities:

- Smart growth: developing an economy based on knowledge and innovation.
- Sustainable growth: promoting a more resource efficient, greener and more competitive economy.
- Inclusive growth: fostering a high-employment economy delivering social and territorial cohesion

As a general rule, the NSC believes that the consultation document is demonstrating in a good manner how the TEN-T policy could boost the contribution to the 2020 objectives by modernizing

and decarbonising the transport sector. However, by putting stronger emphasis on accessibility, maritime transport and links to 3rd countries as recommended in this response, the contribution to 2020 would be even stronger, in particular when it comes to the “inclusive growth objective”.

With the purpose to optimising transport chains (using inter alia intelligent transport solutions), removing bottlenecks, reducing congestion and environmental pollution, and convey long-haul traffic – an integration of the **green corridor concept** in the TEN-T planning process would boost the contribution to all three 2020 objectives.

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?

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

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

The NSC supports options for better coordination and combination of EU funding instruments as proposed in the consultation document (Integrated European funding framework). It is also important that the funding instruments are sufficiently flexible and sophisticated to accommodate the specificities of various territories. Furthermore, the level of Community funding should as a main rule be highest for the most sustainable modes.

The NSC also believes it's important to widening the financial tool box for TEN-T by exploiting PPP solutions and user charging, the latter only when traffic flows are sufficient. The funding mechanisms should focus on the internalization of external costs caused by the different transport modes.

It is however regarded unhelpful to review TENs funding on a 7 year cycle along with the Structural Funds, given the nature of project relevant to TENs. A 14 - 21 years frame is considered more appropriate and there would still be a link to Structural Funds funding cycles

The legal and institutional framework of the TEN-T policy review

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

The NSC supports the approach proposed in the consultation document, including a combination of TEN-T Guidelines and the TEN “Financial Regulation” in order to strengthen the link between TEN-T policy priorities and financial resources and for the sake of simplifying the regulatory framework.

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We also support the response of the CPMR at this point when it comes to the benefits of introducing a single common legal act, finding legal ways of ensuring respect for planned timetables, and making member states' commitments legally binding.