



**Directorate-General for Mobility & Transport
MOVE TEN-T POLICY REVISION
Brussels**

Madrid July 30th 2010

Dear Sirs:

From the Spanish Confederation of Transport of Goods (CETM), business organization that unites more than 34,000 carriers of goods by road, with 130,000 vehicles and 215,000 professional, and representative association of the Spanish National Road Transport Committee (CNTC) we send you the answer to the public consultation launched by the European Commission: "**The future policy from the commission about the trans-european transport**"

The CETM represents, defends and promotes the professional interests of the road transport of goods industry.

In the hope that these responses are useful for the Commission and the transport sector in general, we remain at your disposal for any further consideration.

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IN ANSWER TO THE CONSULTATION OF THE FUTURE POLICY FROM THE COMMISSION ABOUT THE TRANS-EUROPEAN TRANSPORT NETWORK

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 principles, put on paper, that inform the conception of the TEN-T such as multimodality, interconnectivity and network optimization, interoperability and efficiency improvement in every modes, sustainability by decarbonization, protection of biodiversity, the focus on service quality, safety and protection, the implementation of ITS, and minimizing investment costs, maintenance and operation, can be considered as suitable but the problem facing the Commission stems from the real viability when prioritizing and try to reconcile with each other without running into contradictions.

It is the same about the criterion to be considered for the network settings such as regional integration, the effects of cohesion, the needs of the internal market, external and global trade flows, traffic of people and goods and the needs users, the multimodality and interconnectivity of the network, and the environmental and climate change issues.

The problem to make these principles and criteria viable and able to combine is knowing which are those that prevail at all times and implement a European policy that fits them as it would have to agree on the political will of individual EU Member States in terms of project priorities, identifying major and intermediate nodes, sources of investment, production and management of funds, etc.

The strengths are centered around the political will of the Union to advance the design of a flexible global and central TEN-T to rationalize the infrastructure investments by combining the interests of the states with the overall interest of the EU and create a broader vision of the network connecting the EU and the rest of the world in an effective and compatible way.

The weak points are focused on the serious financial problems with difficulties in the ability to prioritize and harmonize principles and criterion of the EU priorities with the priorities of its Member States, as well as the difficulties in obtaining in a reasonable time the objectives set by the EU policy combining the TEN-T transport policy and other policies of an economic, social and environmental.

In the design of the TEN-T, must be taken into account as a basic reference, the EU principles of free movement of persons and goods by providing free transit European corridors, which allow a return on existing infrastructure within the network, in the interests of improved efficiency in all modes, and streamlining the use of it without the need to undertake expensive new alternative investment projects that are not strictly necessary for the proper functioning of intermodality and territorial cohesion .

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 actions on the infrastructure must be adaptable to changes in transport policy and needs.

The innovation and application of new technologies and intelligent transport systems can help greatly to maximize efficient use of infrastructure, giving a greater degree of effectiveness and quality for all modes of transport and allowing implementing the principle of comodality and modal integration.

These measures put into practice can help achieve compliance with the targets set within the transport policy, energy and environment compatible with the strategy "Europe 2020."

The contribution of these measures could be strengthened through positive incentives for firms of different transport modes and users of infrastructure to encourage the use of different tools and technological innovations to promote the achievement of the objectives set by the Commission.

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

The strategic objectives of "Europe 2020" are focused in achieving higher growth in the next decade, based on greater economic policy coordination between national and European level. These objectives focus on increasing the employment rate, rising levels of public and private investment in research and development policies and reducing greenhouse gas emissions.

Certainly the planning of the TEN-T will play an important role in the ultimate objective of EU growth as has occurred in recent decades with the development of communications and inland transport has contributed decisively to the consolidation of a single, prosperous, and dynamic European market, with high internal growth rates of GDP and connected to other global markets.

Planning for the TEN-T will contribute to the rationalization in the design of the Global and Central Network and will also contribute to a better market access and therefore to the exchange of goods and economic growth.

Investing in the construction and maintenance of the network will bring an increase in direct and indirect employment rate.

Public and private investment in STI and R&D projects destined for improvements in vehicles, fuels, management, safety and environment, in turn will lead to improvements in the planning of the TENT-T and consequently contribute also to meet the strategic objectives of "Europe 2020".

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?

First, we should have a clear idea of the network infrastructure currently in service and the degree of use of such power in order to maximize investments already made by removing bottlenecks that constrain wise use of the same (e.g. generic remove restrictions to traffic in goods and to establish trans-European corridors).

In order to prioritize the fate of the scarce resources of funding will need to consider maintaining the existing network plus investment in new projects involving high value added

for the EU, for which the Commission and the Executive Agency of the TEN-T should be able to carry out coordination between the financial instruments of the EU and Member State budgets.

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

Setting an interagency coordination group composed of officials appointed by the Commission and the Member States, which is capable of carrying an updated control of ongoing investment projects and joint efforts of cross-border investors for the construction and maintenance of TEN-T.

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

Yes, always clearly determined their skills and be endowed with the level of independence necessary to develop them.

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

Bringing light to the decision processes in terms of priorities in selecting projects, funding, implementing and reviewing and responsibilities of various actors involved in the projects.

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