



EUROPEAN AUTOMOBILE  
MANUFACTURERS ASSOCIATION

ACEA

THE SECRETARY GENERAL

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Mr. Siim Kallas  
Vice President  
European Commission  
200, rue de la Loi  
1049 Brussels

Brussels, 7 September 2010

Dear Vice President,

I am writing to you in relation to the public consultation on the future Trans-European transport network (TEN-T) policy.

ACEA, the European Automotive Manufacturers Association, very much welcomes that the Commission prepares the revision of the TEN-T policy. The automotive industry and its customers rely heavily on a functioning transport network that provides reliable and efficient mobility to citizens and helps companies conducting business competitively compared with other regions of the world.

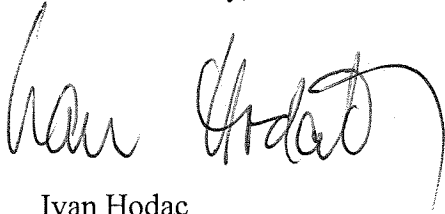
ACEA has actively participated in the TEN-T policy review debate and submitted a detailed position paper in April 2009 in response to the Green Paper on the future development of the TEN-T. The content of the position remains valid. We would like to take this opportunity to highlight its main points:

1. The European transport network is increasingly characterized by the persistence of bottlenecks, missing links and lack of interoperability. The **competitiveness of the European economy needs a better transport network** and a new impetus is needed to create this.
2. Some projects prioritized under the TENs concept have been successful. However, the automobile industry shares the **disappointment about the proportion of long identified "priority" projects so far completed.**
3. ACEA notes that only 3 of the 30 priority transport projects are devoted to road and firmly believes that the **Commission has to avoid addressing TEN-T policy on the basis of "modes of transport" but on the basis of "efficient transport"** and should not base its policy on the assumption that some modes of transport would be, by definition, more environmental friendly than others and should therefore be given preeminence over the others.

4. The Commission should **develop a rigorous methodology to identify and select the priority projects** covering all major transport axes that cross several Members States. All future priority projects need to be subject to rigorous cost/benefit analysis.
5. Europe's transport infrastructure, especially its road network, is falling behind what is required for a modern economy. This is mainly due to **lack of investment**. This has **contributed to bottlenecks and increased congestion and CO2 emissions**. It needs more Community and national funding for key transport projects.
6. The **financing of TEN-T road projects should be conditioned to the full implementation of the Directive on road infrastructure safety management** by the Member States concerned.
7. Finally the increasing use of tolls, either through an interoperable electronic collection system or through other means should provide dedicated finance for investment. **This finance from road users should not be in addition to existing taxes but it should be dedicated to the improvements in the road network** that users have the right to expect in return for the € 350 billion they already contribute to government revenue. It should not be used to cross-subsidize poorly performing transport modes which provide only limited alternatives.

We are looking forward to contributing to the Commission's proposal for reviewed TEN-T guidelines in 2011 and remain at your disposal for any further clarification that you may require.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ivan Hodac', with a stylized flourish at the end.

Ivan Hodac