

## **WWF Hungary's Comments for the consultation of the future Ten-T network policy**

Budapest, 10. September 2010.

WWF is interested in the development of the Ten-T network through the inland navigation projects. The inland navigation is theoretically the most environmental friendly way of the transport but to achieve the infrastructure criteria huge violation on the ecological status of the river must be implemented. On the basis of these experiences WWF has published several studies which most important statements are the following:

WWF can support the development of inland navigation on the Danube only if projects:

- have clear positive effects on river ecosystems basin-wide and locally;
- are environmentally sustainable;
- respect socio-economic need;
- meet all legal requirements;

### Basin-wide sustainable navigation plan

To establish a sustainable navigation system, an overarching 'sustainable' navigation plan for transport along the corridors including intermodal aspects. This plan has to strike a fair balance between ecological, economical and socio-economic needs. The holistic approach has to be applied before individual projects are planned locally. The tool to reach sustainable navigation plans is an international Strategic Environmental Assessment process.

### Connect Ten-T guidelines with Water Framework Directive

So far Ten-T guidelines and WFD have been considered separately. In order to establish a sustainable inland navigation plan, these both need to be combined leading to sustainable navigation. This includes respect of transport projects to the WFD requirements: no deterioration, improvement of ecological status and genuine public participation.

### Ecological compensation measures

Sometimes new innovation technologies can compensate to existing hydraulic river construction through restoration and compensation measures for river morphology and ecology. Such measure aims to reactivate natural dynamic processes of the river in a controlled manner. Some examples are reverse engineering of obsolete or superfluous constructions, opening of side channels, removing shore reinforcements and obsolete dams and restoring river sections that are problematic for inland navigation. Such compensation measures should be explored and implemented alongside navigation projects where suitable. But the biggest compensation if such a measures are planned and done in the riverbed which has the smallest ecological effects and have the smallest structural works what is possible.

### SEA, EIA about Ten-T projects

The green paper document includes the importance of the transnational agreements, conventions and EU directives. The improvement of transport corridors e.g. navigation routes can not be in line with all the requirements of these documents. WWF asks that during the consultation of the Ten-T policy put more pressure on the nature conservation requirements. The ecological services of the rivers must be preserve in the future and it is not acceptable if these are threatened by any transport developing projects. We do not agree with the next statement: "...improve efficiency of all modes of transport". Can not be improve those

transport modes which have damaging effects on the ecological values and ecological services, or other social interests. We suggest to write this: “improve the efficiency of different modes of transport but only if there are assessments about the alternatives of the potential improvements. (there needs to be alternative ways of improvement even within one sector, e.g. improvement of port infrastructure or improvement of navigation route.) Only the best alternative can be improved under the umbrella of the Ten-T.”

#### Ten-t coordinators

The consultation document declares:

“In addition, the creation of a TEN-T Executive Agency and the appointment of European Coordinators have considerably improved the implementation of TEN-T projects.”

According to our experiences the Ten-T coordinators really help pushing the Ten-T projects in the relevant countries. The coordinators help the work of the responsible transport ministries and lobby actors (like navigation lobby), but the role of NGOs and the role of nature conservation authorities is in balance with the role of responsible transport ministries in this situation. According to the WWF Hungary not only a Ten-T coordinator but a coordinator from the DG environment should also need to follow and check the Ten-T priority projects.