

Answers of the Mediterranean Transport Group at the Peripheral Maritime Regions Conference to the public consultation on the report of the High Level Group on the extension of the main trans-European transport axes to the neighbouring countries and regions and the way forward

1. Do the five main transport axes highlighted in the High Level Group (HLG) report, in your view, represent the main axes for international traffic and what you add/delete, if given the opportunity and why?

In our opinion the chosen axes represent the main transport routes that relate the EU with our neighbours. However, we believe that its design has been done using a methodology that lacks of a cohesion perspective, within the European boundaries. In our view it should not be done only by means of the current amount of freight, number of vehicles or GRT that at the present are using a certain corridor.

On the other hand, the design of these axes in the neighbouring countries relies very much on a future cohesion, At this moment it might be called development, rather than meaning an answer to any congestion or environmental problem.

We think that their design, layout and objectives of the axes are different among them because of their origins, and therefore we could separate them in three groups. The first group includes the northern and central axis which will connect relatively prosperous areas with traditional ties and links with countries already EU members. It could be seen as a natural extension of the TEN-T with a commercial justification.

In the second group, Motorways of the Sea, have the same threats and opportunities that those of the TEN-T, but with a more distant perspective of the problem. In the TEN-T priority axes the peripheral regions had the problem that better placed regions, this means more central regions, would have better opportunities because they have already a steady flow of freight. Therefore, any attempt to establish a SSS line or to promote a modal shift would be easier due to the volumes carried. Besides, peripheral regions would remain less competitive because there are no such commercial advantages to set up any viable MOS facility.

This problem, already stated in many occasions, could get accrued at national level if the MOS concept is not carefully planed between the neighbouring countries and the EU. In this respect, we welcome the idea that the proposed axes should link one of the 30 major TEN axes in the way that their extension will contribute to make peripheral regions more central.

The third group includes the other two axes, the south eastern and south western axis, we consider that rather than a commercial relation with these countries the main *motto* is the achievement of regional development targets and, therefore, they should be considered in a different scale in comparison with the other groups. From our point of view these development targets have already other instruments like Cotounu

Agreements, MEDA, etc, that should be used at their full extent rather than introducing other policy instruments, even if they could be aiming at more sectoral approaches.

To conclude, given the aforementioned reasons we think that a difference should be made between projects and axes in the North and Western Europe from those other that surround the Mediterranean basin.

2. The HLG report outlines a number of measures, on so-called horizontal issues, are these the most important ones and do the recommendations made by the Group help to solve the problems?

It is in these issues where the EU can be a really crucial player as the coordination part should be encouraged to achieve better standards. In many occasions has been said that inter-modality and logistics are the key concept to achieve a truly efficient and reliable transport system. In our view, interoperability of systems, efficient information flows and secure and safe transport means need a common effort to implement measures that cloud enhance the advantages of the use of various transport modes that at the moment only take place, and not everywhere, at national level.

Therefore to transpose these solutions that in some place has shown very effective, to a further than EU area, any effort will be very welcome.

3. Financing transport investments is a headache. How can the implementation of these axes and horizontal measures be best financed? What could be the role of the private sector and the user charges?

Again we should make a clear distinction between those project carried with a commerce enhancement perspective rather than those with a development perspective. The first ones should be done with view of the concept of user pays, when the second ones should rather be with other that might be called beneficiaries pays.

Therefore the use of appraisal tool should take into account broader perspectives to reflect the impact into society, not only the users. In this way we welcome the efforts that are being made at harmonising European transport projects appraisal, with initiatives such as the HEATCO project or other tools such us RAILPAG, to assess railway projects, developed bay the EIB.

All these tools should be used at their utmost to have a clear idea of the cost-benefits of the projects and, if the case, allocate the needed funds whether public or private. The use of public investment in transport infrastructure to increase the fixed assets stock of certain regions or countries as means to promote more stable and reliable economies should be part of other economic policies rather than part of the development of a hypothetical extension of the TEN-T.

Furthermore, the lack of funds to develop the proposed transport network comes as something obvious given that the funds available to develop TEN-T are already very scarce. Therefore the solution provided, the further involvement of financial institutions, the EU and national funding need the participation of the private sector to be realistic.

Once the origin of funds is determined the abovementioned appraisal should be carried to prioritise the projects and to enhance a revenue mechanism that would allow future projects to be developed.

To foster the private participation a clear legal framework is essential to try to attract private funding, which for these very costly projects is usually reluctant to get involved if risk doesn't reach some security thresholds.

4. For the implementation and coordination of the recommended actions, the report calls for either a memorandum of understanding or an international agreement- do these help to achieve the objectives? If not, how would you ensure the implementation and coordination of the actions?

From our point of view, it is too early so say which one would be more effective. And it would depend very much on the content of each concept and, most of all on the financial allocations or instruments linked to them to make them more appealing to be fulfilled by the different partners.

5. The Group has envisaged integrating the existing agreements and memoranda of understandings into a coherent framework. Should an international treaty be envisaged for this?

At this moment we believe that both instruments are adequate to the objectives in each area and axes. As said before, in our view, the different origins of the projects in the central and northern axes and those in southern of Europe, make the instruments chosen more suitable for the stated purposes.

Therefore they should remain separated as they developing processes are different, their national and market situations are also different and also the modal means to connect with the European central markets are also different.

Nevertheless the creation of European coordinating secretariat, even different secretariats per axis, would be a very interesting idea to promote an equal working framework, but respecting the different orientation and financing resources of each corridor.