



EC - DG TREN - Energy & Transport
Mrs. M. Genoux-Stawiarski
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BE - 1040 Brussels
Belgium

Brussels, 11 August 2003

Subject : Comments High Level Group Van Miert on TEN-T

Dear Madam,

On behalf of the European Dredging Association we have the pleasure to commend the High Level Group on its well-founded and balanced recommendations. The trans-European transport networks are of vital importance in ensuring the free flow of goods across the Union and we welcome the report. Our remarks concern some details or oversights, as well as some observations on financing and priority setting.

1) On the network of trans-European waterways :

- With reference to the map List 2 - Project 04 - Inland waterway Seine - Scheldt, we remark that the link via Belgium is shown to follow the Dender river. This surely is an error, since actual implementation of the Belgian section has started and follows the link via the Lys from Kortrijk to Ghent.

- With respect to the Danube corridor (List 1 - Project 02), we endorse the comments made by the Group concerning the importance of the section ~~Straubing - Vilshofen~~.

It comes therefore as an anomaly that it should take another 10 years (until 2013) to remove this bottleneck. The project has been "studied" for more than 10 years already and a viable solution should be implemented without delay.

Our hope is that the Group has erred on the proposed implementation date. If this were not the case and the German government is serious in its planning recommendations, than it raises the question whether the Commission should not have more political clout in setting priorities for projects of importance for the whole of the Union ?

- Further on the project Seine - Scheldt via waterway, the observation by the Group that one of the Member States is not in a position to confirm a time horizon for this project is troubling, to say the least.

Even recognising fully that the financial burden to develop TEN infrastructures is a heavy one, the particular link has the potential to remove enormous quantities of freight from the roads. Surely this must lead to a positive outcome of any cost - benefit analysis.

2) On costs and financing

- There are a number of flaws in current (national) cost - benefit methodologies as applied to infrastructure projects. A unified methodology to allocate proper benefits to trans-border projects is missing. This undoubtedly has an effect on the appreciation of some of these projects.

If one takes again the waterway Seine - Scheldt as example, the French methodology to assess such a project is defined in the 'Circular Bastard'. According to this methodology, transport volume between the Paris and Lille basins would be considered. There is no formal consideration of the equally important flow of goods between Lille and Ghent / Antwerp / Rotterdam, because it crosses national borders and the impact on national economy is difficult to quantify.

The conclusion of a cost - benefit study would be flawed as a result of this. We are convinced that a proper evaluation of the European dimension would change the priority considerably : we plead for improved cost - benefit methods that quantify the European dimension (see section 6.6.1.4. pt. 38).

- As a result of a possible imbalance in the geographical allocation of costs and benefits of transborder projects there is a need for a corrective mechanism by which the Commission can increase the extent of financial support. The Group alludes to this in section 6.6.1.3. pt. 18; the recommendation in section 6.6.1.4 pt. 37 is more explicit. We plead that the Commission follows-up on this recommendation.
- The implementation of the networks should also seek to strengthen sustainability of transport. As pointed out in the White Paper and in the Van Miert report, this favours transport by rail and waterways.

Our suggestion is that this policy goal may also be endorsed by adding financial incentives via EU funds. In particular for Member States with a waterways network (Germany, Netherlands, Belgium, France, Austria ?, Luxembourg ?) one could propose the following rule : at least 5% of the EU financial contribution to TEN-T infrastructure (until 2020) should be invested in waterways subject to penalties.

EuDA welcomes the opportunity to express its appreciation; we wish the Commission wisdom in developing guidance that seeks to optimise the European transport dimension.

Yours sincerely,

F.J. Mink

p.o. Van Hende