

Comments on the report of the High Level Group on the TEN-T Recommendations for the revision of the TEN-T guidelines

The trans-European transport networks are of vital importance in ensuring seamless freight flows across an enlarged EU. The report of the high level group formulates balanced recommendations with regard to the revision of the TEN-T guidelines in favour of a more integrated and intermodal network. The criteria for the selection of project priorities and horizontal issues are fair and pertinent and support the corridor approach for efficient and sustainable exchanges within the internal market.

- + fair selection criteria
- + a coherent sum of projects and horizontal priorities
- + corridor approach with attention for intermodality
- + more coordination of preparation, assessments and financing via cross-border approach
- constraints related to adequate financing and time horizon

Although the investments necessary to carry out the recommended priority projects of the TEN-T represent on average only 0.16% of GDP which should be perfectly feasible without endangering national budgets, INE is concerned about funding. There is no doubt that Member States in principle acknowledge the socio-economic added value of cross-border projects. Nevertheless, experience learns that, in absence of a strong European framework, financial commitments for mid and long term plans are often shelved.

Waterways

INE appreciates the high level group selected two corridors for waterways instead of single projects. The group recognises the need for strengthening alternatives on the east-west axis and on the north-south axis. This approach sustains reliable international freight flows and will hopefully lead to better cross-border coordination between the involved Member States.

▪ Rhine-Main-Danube

The group rightly stresses the importance of an adequate water draft for the selected axis, in particular for the stretch Straubing-Vilshofen. **INE fully endorses the group's recommendation in favour of a guaranteed draft of at least 2.5m during all seasons in the upcoming revision proposal of the TEN-T guidelines. In order to develop long-distance and reliable inland shipping services on this increasingly congested corridor, the time horizon for carrying out the necessary works should be reviewed.**

▪ Seine-Scheldt

INE agrees with the group that the Seine-Nord project presents a high European added value and would have appeared in list 1 if a firmer commitment from one of the involved countries had been made. INE is however convinced that assent is imminent for the project to be added, which would certainly bring about a more optimistic time horizon to solve the urgent congestion problems along that corridor.

INE recommends including these two projects within the upcoming revision proposal of the TEN-T guidelines. It is important to note that investments in waterways bring additional gains since projects can take care of multiple goals from transport to recreation, water supply and flood protection. Moreover, project plans today attach special attention to nature restoration and development to mitigate short-term effects and maximise the ecological value of the water environment.

INE understands the group's support of the Commission's position in favour of subsidies of up to 50% of the overall costs for a dedicated rail freight network. But if the group is really aware of chronic lack of funding in inland waterways, a selective approach to rail freight transport appears imbalanced taking into account the overall challenges ahead. **INE hopes that the Commission will also give its full political support to the proper maintenance of important TEN-T waterways within the framework of the annual and multi-annual programmes by formulating adequate financial provisions up to the rate of at least 20%.**

With regard to the maps, INE would like to suggest using more accurate and user-friendly charts for the revision outlining the transport axis on the one hand and the specific bottlenecks on the other.

Finally, INE noticed that the TEN-T waterways were left out by accident from the current TEN-T in figures in the EC publications "TEN-T priority projects" (Memo) and "Priority projects for the TEN-T network up to 2020" (Memo).

River Information Services (RIS)

INE welcomes the group's recommendation to add the pan-European implementation of RIS to the thematic priorities. RIS indeed will contribute to more **safety** and efficiency within inland navigation, but will also optimise its interaction with all partners in the **intermodal** transport.

Besides the safety component, RIS represents another strategic advantage in the general public interest. Its compatibility with VTMS creates the opportunity to **extend maritime and port security to the hinterland**. In this sense, RIS presents a technological solution for an enhanced security of the feeder transport as a result of real-time knowledge of the incoming and outgoing freight and of the various parties and their responsibilities. Transparent but secured information processes including customs data can be generated, executed and checked between all relevant parties.

A framework directive is a first step towards harmonised implementation. **A deployment plan and appropriate financial support will be necessary to ensure that the general public interest is covered adequately.**

Motorways of the seas

The group recommends integrating the required legal provisions to encompass motorway of the sea projects in the guidelines. Developing the concept of motorways of the sea is indeed a smart tool to bypass land bottlenecks. In order to reach the major sites of industry, commerce and consumption in Europe's hinterland, the port-to-port services have to be completed with congestion-free door-to-door concepts. Shipment further inland by water has the added benefit of further reducing dependency on long haul road transport.

To address congestion effectively, it is of utmost importance that the criteria cover entire freight corridors including the hinterland of ports and should therefore go beyond port pairs. Finally, the TEN-T criteria should ensure that any Community support leads to macro-economic benefits on the overall corridor instead of favouring a particular private partner. The reference to the organisation of general interest services in compliance with competition rules is important. Additional measures to address private partners can be taken in other policy fields.

Financing

A sound financial framework is necessary to avoid that governments are buying more time than our society and economy can afford. Since the introduction of a Community charging policy for all modes has turned out to be a long term exercise, it is indeed important to calculate which % can be covered by private capital and secure financial sources for the public-type investments. INE believes the Eurovignette directive can mark a first step allowing cross financing, but INE is convinced that the EP suggestion to **create a European Transport Fund will more adequately tackle the lack of current financing.**

But the **allocation of funds should in all cases be linked to the qualitative and quantitative contribution of a project to maintain Europe's competitiveness, while ensuring a more balanced transport development.** In that respect, big scale projects should not overshadow smaller projects with a higher added value for the internal market and sustainable mobility.

As regards inland shipping, public-private partnerships are a suitable formula for transshipment interfaces, but investment in waterway infrastructure remains a public issue. This is largely due to the multiple functions in waterway management. Besides transport, waterway development covers tourism and important public functions such as flood protection, nature conservation, alternative energy power and water supply for households, industry and agriculture. If the group emphasises that investment projects in the transport sector have a life of many decades for the benefit of future generations, the long-term societal gain is obviously even more significant for waterways.

This is an additional strong argument **to remove the discrimination between the two environmentally sound modes rail and inland navigation in the EC proposal of 2001** with regard to the increase of Community assistance up to 20%.

More coordination

INE welcomes the idea of coordination entities for cross-border projects. If equipped with a powerful status, they may give an important boost to this type of projects thanks to a coherent and strategic vision and coordinated fundraising. The set-up of common structures should of course not delay mature projects.

INE also appreciates the reflection about a more integrated approach to assessments. This is an integral part of elaborating a vision on the development of the TEN-T itself. Since this vision incorporates the goals of sustainable development relying on a sound economy, society and environment, a strategic assessment should combine in its cost-benefit analysis economic, societal and environmental values. The long-term effects to be examined include prospects for viable and competitive exchanges, sustainable and safer mobility, reorganisation of transport patterns towards optimising spatial development and minimising land fragmentation. Additional benefits beyond transport should be considered as a plus and not be left out of the scope of the analysis.

If a comparable set of criteria is applied for all projects taking account of the specific barriers and potential alternatives along each axis, projects can be assessed more systematically and compared on their merits.

European Transport Observatory

INE is convinced that the establishment of a European Transport Observatory is a necessity if the enlarged EU is serious about developing a strategic and truly trans-European network. A publicly accessible GIS should be developed to permanently monitor, evaluate and forecast passengers and freight flows from departure until destination linked to centres of production, population density, congestion peaks, geographic barriers, accident rates, administrative burdens, nature zones, technical progress and developments etc. Such a dynamic GIS should concentrate research and replace the current and often conflicting studies. This tool would provide a sounder basis for the work of the observatory and the preparation of policy decisions.

Brussels, 20 August 2003