



Report on the priorities of the Trans-European Networks for Transport An Environmental -NGO Contribution

General points:

The revision of the Trans-European Networks for Transport (TEN-T) should be moving the EU transport policy towards a more sustainable future. The initiation of the Impact Assessment procedure through the opening of a consultation process is a welcome step towards that, although we believe the timing of this consultation, during the summer break, is unfortunate and prevents a real debate including all stakeholders.

Environmental NGOs are concerned as there has been no public discussion of the scope and contents of this revision. There are certain issues related to the TEN-T that come across more and more often in both research studies and political declarations (real economic efficiency, cohesion indicators, environmental performance) which have been only marginally dealt with in the report of the High Level Group on the Trans-European Transport Networks and the Amended proposal for Decision No 1692/96/EC. However, these important principles should have been the basis of an Extended Impact Assessment.

Moreover, taking into account Articles 2 and 6 of the Nice Treaty, environmental issues should stay at the heart of every EU policy, including transport, with a view to promote sustainable development.

1. Strategic Environmental Assessment

Although the report notes the need for a coordinated Strategic Environmental Assessment (SEA) for cross-border projects, we believe that these points are not made sufficiently clear and financial issues related to TEN-T will continue to prevail when taking decisions. Such an SEA has been previously mentioned by the amended European Commission proposal for the revision of Directive 1962/96/EC and recommended, in a stronger form, by the European Parliament during the first reading of the 2001 revision^{1,2}.

¹ Proposal for a Decision of the European Parliament and of the Council, amending Decision 1692/96/EC, on community guidelines for the development of the Trans-European Transport Networks (COM/2001/0544 final - COD 2001/0229)

² In April 2003, the Joint Expert Group on Transport and Environment also recommended that a coordinated SEA should be carried out at the initiative of the European Commission (via the TEN-T Committee)

2. Decoupling

The whole report starts from the assumption that in the future transport volumes will grow, thus investments are needed - meaning more infrastructure - to solve problems of congestion, bottlenecks and to provide better connections for peripheral areas. Such an approach is flawed, as the real need – as emphasised by the Gothenburg Council of 2001- lies in decoupling transport growth from economic growth, rather than reinforcing that link.

3. Quantity vs. Quality

A quality transport system should first look at the economic, environmental and social needs and implications of projects and afterwards decide on their priority level. In the present European transport system, there are trade-offs between the quantity and the quality of the transport networks, which favour quantity. As most of the projects are in very early stages of planning, this is a good time to assess their long-term contribution to the quality and efficiency of the network. However, we believe the group lost sight of the overall needs and the possible alternatives to building, and focused on the increase of individual transport capacities.

4. Selection Procedure and the Environment

The process of choosing the priority projects was flawed. Apart from issues of transparency, we believe the methodology for the selection did not give the required attention to the European Union's environmental commitments as presented in the Treaty, especially to the project's contribution to a more sustainable transport system.

5. Cost-Benefit Analysis

The Commission has developed some guidelines for Cost-Benefit Analysis, however these should be developed further, so that they include social and environmental costs and benefits, including an economic valuation of the opportunity costs for other functions (such as ecological, landscape). Also, as the High-Level Group report notes, the practice varies widely from one Member State to another, which should be rectified by setting up a common method for CBA.

6. Social cohesion

Social issues are directly relevant to the TEN-T. While peripheral areas may suffer from a lack of connections, central areas are blocked with congestion, along the TEN-T corridors. More infrastructure condensed in the central regions will only increase the gap, instead of achieving the TEN-T goal of social cohesion. At the same time, it is not proved that building more infrastructure actually benefits the social cohesion in the peripheral regions. The amount of money needed to invest in the new priority projects could be more usefully employed in other areas of EU's economy, with a greater impact on the well being of its citizens (such as education, health, etc).

Specific comments on the High Level Group report:

- a) There is a majority of railway projects - but railways are not in and of themselves a justification for investments. Hundreds of kilometers of railway lines are being closed in CEE because there is bad management and not enough money to repair them³. At the same time, inefficient use of the existing infrastructure leads to bottlenecks in the network and decreases the overall attractiveness of this transport mode. If the management issues are not tackled first, new lines will have to overcome the same bad image.
- b) We believe that, unless a thorough assessment of all transport options is made, the motorways of the sea might become an incentive for additional road and rail trips, by creating additional carrying capacity. Also, the motorways of the sea can be more damaging than roads (for example the high-speed ferries not only consume important amounts of energy - but also may threaten maritime or fluvial flora and fauna). This depends on the speed and emission performance of ships, as well as on the way in which they are operated and should be well regulated before any significant investments are made.
- c) In addition, there is no reference in the report to the need to respect the provisions of the new EU water law: The Water Framework Directive, which entered into force on 22 December 2000. This is particularly relevant when developing inland waterways and motorways across river, lakes, wetlands and coastal waters. The Water Framework Directive requires Member States to prevent further deterioration in water status and to achieve “good ecological and chemical status” through Integrated River Basin Management, even beyond their borders. These environmental objectives should deliver ecological quality improvement for freshwater eco-systems.
- d) The selection of the Priority Projects does not take into consideration the sensitivity of high-value natural areas Member States are obliged to protect under the Birds and Habitats Directives as Natura 2000 sites. Several of the Priority Projects have been identified to have a likely negative (sometimes disastrous) impact on existing or candidate Natura 2000 sites. These projects are:
- Eliminating bottlenecks on the Rhine-Main-Danube: a BirdLife International study identified 19 Important Bird Areas (IBAs) along the Danube corridor, which can be affected by this project in the accession countries. The deepening of the Vilshofen-Straubing section of the Danube will also threaten ecologically sensitive areas.
 - Motorways of the sea: these could affect important seabird and wintering waterbird concentrations, especially in the shallow Baltic Sea area.
 - Mixed railway line Lyon – Trieste/Koper – Ljubljana – Budapest: this line will cut through at least one IBA in Italy.
 - Rail/road bridge over the strait of Messina: this project could prove disastrous to this important migratory bottleneck site (20,000 birds of prey every autumn).
 - Fixed rail/road across the Fehmarn Belt: highly controversial project cutting across a key migratory bottleneck for millions of migratory waterbirds.
 - Motorway Greek/Bulgarian border – Sofia – Nadlac (Budapest)/Constanta: the strongly criticized plan to cut across the Kresna Gorge in Bulgaria falls within this project.

³ Length of railways decreased by 5% in the Accession Countries. Source: TERM 2002, Paving the way for EU enlargement.

Our recommendations for the revision of the TEN-T guidelines:

NGOs have several key **recommendations** for improvements to current TEN-T policy, which we believe must be fully integrated into the proposal for a Decision on the revision of the TEN-T that will be published later in the year:

- **A full Strategic Environmental Assessment of the whole network (TEN-T and TINA) must be carried out** – coordinated by the Commission, with the full cooperation of the Member States. This is vital to ensure that negative environmental impacts are minimised.
- **Local networks must be prioritised.** Local and regional transport systems should be maintained and improved, before national and EU funds are allocated to trans-national transport infrastructure. A special attention needs to be paid to the intermodality of each investment.
- **Cost-benefit analysis must be improved.** The TEN-T revision should make consideration of the ‘zero’ (no new investments, but policy solutions) option compulsory. Improved methods of cost-benefit analysis must be developed, which integrate social and environmental costs.
- **A fair pricing system needs to be immediately set up.** The TEN-T revision should be preceded by legislative changes that set-up the framework for a fairer pricing system, which helps internalise the external costs of transport.
- **Transport growth and GDP growth must be decoupled.** The Community’s Sixth Environmental Action Programme and the conclusions of the Gothenburg EU Council set as an objective the significant decoupling of transport growth from economic growth. The TEN-T guidelines should refer to this objective.
- **Integrate the needs of the Natura 2000 network into the TEN-T.** The Natura 2000 network of sites designated under the EU Habitats and Birds Directives protects Europe’s most important areas for wildlife. There must be no net loss to the ecological integrity of the Natura 2000 network as a result of transport infrastructure developments.
- **The TEN-T guidelines revision must fully respect the environmental acquis, including the provisions of the Water Framework Directive.** The requirements of Good Ecological Status via integrated river basin management and taking into consideration the specific value of wetlands for water management along European rivers must be implemented
- **The European Investment Bank (EIB) should not be given a new mandate of providing a special fund for TEN-T until it improves its access to information and environmental procedures.** The EIB should present a set of clear rules allowing affected citizens to get timely access to project information. The Bank must also increase its capacity to verify the environmental impacts of its investments, and not leave this entirely up to the project promoter.

Also available:

Trans-European Transport Networks: Options for a sustainable future, a publication of 5 environmental NGOs on the priorities for the revision of the TEN-T guidelines. Downloadable at:

<http://www.t-e.eu/Publications/2003Pubs/T&E03-2.pdf>

Conflict areas between the TEN-T and nature conservation – Case studies, six examples of conflicts between the TEN-T projects and the environment.

Downloadable at: <http://www.t-e.eu/CEE/7-2003-Casestudies-TENS-TINA.pdf>

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