



625

Federation of European Private Port Operators

Mrs. Martine Genoux-Stawiarski
Directorate General for Energy and Transport
European Commission
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Brussels, 4 September 2003
Ref: 0300044 – FEP-V-1.2.

Subject: TEN-T Revision

Dear Mrs. Genoux-Stawiarski,

On 14 July 2003, the Commission announced a consultation round with respect to the high-level group report on revision of the TEN-T network. It is in the light of this announcement that FEPORT would like to present its comments and suggestions.

In general, FEPORT is of the opinion that with the expansion of the EU to the east it is opportune to consider a revision of the TEN-T network and to redefine the priority projects up to 2020 in this respect. The idea that projects must complete missing links in the network or help eradicate bottlenecks is welcomed.

Amongst the 22 priority projects the group has defined "motorways of the sea" to promote short sea shipping.

According to the high-level group, a number of potential routes, however, have not taken off, for, amongst others, the following reasons:

- > The administrative burden of customs;
> The lack of regularity and punctuality;
> The absence of adequate facilities (logistic facilities, one-stop commercial stops, mobile equipment, infrastructure).

FEPORT agrees that maritime transport has a potential to remove lorries from congested roads, and welcomes that in the framework of the TEN-T revision sea-routes are seen as central transport-infrastructure and that the concept of motorways of the sea makes sea-transport a priority in the the future TEN guidelines.

Of course distortions of competition between different ports should be avoided. The high-level group recognised this and stresses the importance of tender-procedures to avoid unfair competition.

Further, FEPORT is of the opinion that any aid given should be limited in time and money, well-defined, granted in a transparent way and well-supervised.

Also, any funding awarded should only apply to cargos being transferred from other modes of transport and not to existing maritime traffic diverting from one route to another.

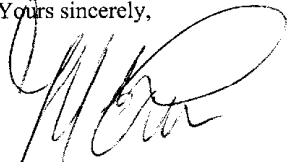
FEPORT further agrees and has been arguing for years that the administrative burden of customs may seriously hinder short sea shipping and is therefore actively co-operating in the Maritime Industries Forum to help eradicate these bottlenecks in the framework of the Commission's Vademecum on customs procedures.

With respect to the absence of adequate facilities, however, we believe that this should be left to the market. The European Union should enhance the legal framework within which short sea shipping operates, but should not define what facilities are needed and where.

To conclude, I would like to stress that motorways of the sea should be driven by the industry from a market-oriented commercial approach.

I hope to have informed you sufficiently for the moment and hope you will be able to take our comments into account.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Hanneke de Leeuw', written over a horizontal line.

Hanneke de Leeuw
Secretary General