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European Commission
Directorate-General for Energy and Transport
TEN-T Revision
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By e-mail and mail

RE: Comments of the Swedish International Freight Association (Sveriges Transportindustriförbundet) on the report of the high level group chaired by Mr Karel Van Miert relating to the revision of the TEN-T Guidelines

The Swedish International Freight Association, hereinafter the Association, organizes all types of Swedish enterprises involved in freight transport, freight forwarding and logistics and is tasked to promote the interests of its members in relation to authorities, other organisations and the general public. The Association appreciates the opportunity given to stakeholders and interested parties to communicate to the Commission their comments in the report of the high level group.

The Association hereby submits the following views.

The Association first wishes to express its appreciation of the general approach of the report in focusing on a transeuropean perspective, set in a context where transport flows are changed by enlargement, inter alia by defining a limited number of multimodal transeuropean corridors and giving priority to efficient cross border projects, mainly within these corridors.

The Association likewise shares the view of the group, proved inter alia by domestic events in Sweden, that the financial resources required to build the needed infrastructure cannot be provided through the normal public Community or National budgetary resources, and that other solutions must be considered such as recourse to the international capital markets, dedicated use of the revenues derived from infrastructure charging and considering options for attracting private capital, such as facilitating the development of public private partnerships. Charging and involvement of private capital are solutions that are most useful in regions where commercially feasible, but will make more public funding available for regions where this is not the case. The Association supports the plea by the group for increased budgetary commitments be it at EU or State level and better co-ordination of

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Swedish International Freight Association

various budgetary resources and of the priorities of the EIB with the transport policy aims of the EU.

The Association finds very useful the suggestion that a promotional body be created for each corridor to co-ordinate, encourage and optimise its implementation and that specific management frameworks are created for cross border projects. Such measures will help promoting an attitude to infrastructure planning, particularly on the part of national planning authorities, that looks beyond national borders.

Obviously, the Nordic countries and stakeholders based there, are geographically sufficiently peripheral in the European Union to have long communication lines to markets and purveyors in central parts of Europe. They therefore want the relevant infrastructure to be of good quality, with a reasonably priced access. Enlargement and the new neighbourhood policy will also make them transit countries, increase volumes and possibly change the traffic pattern.

Against this background, the Association takes a particular interest in the following items.

Priority projects, such as the Motorways of the Sea, particularly in the Baltic and in the North Sea, the Nordic Triangle Copenhagen – Oslo – Helsinki via Stockholm and the Fehmarn link, putting an accent on the logistical aspect, linking up to programmes such as Marco Polo (aid to multimodal transport), the harbour package and the improved functioning of harbour infrastructure that may ensue from it. All these logistical elements may help developing efficient transeuropean multimodal transport corridors. That should also be the case as regards the proposal for a directive on intermodal loading units, presented with the communication on a programme for the promotion of short sea shipping (COM (2003)155 final). The proposal of harmonised and interoperable loading units is obviously very useful and the proposal for a European Intermodal Loading Unit certainly meets practical needs. The Association nevertheless wishes to point out that it is now vital to avoid that this proposal, if adopted, leads to further diversity of standards and regionalisation of standards on a worldwide level. The Association suggests that the Commission should already now work closely with users to try and avoid such negative consequences and smoothen the way forward for the proposal. The Association recalls that the dangers of further diversity of standards were raised by various stakeholders at the preparatory stages of the proposal.

As for the Motorways of the Sea, the Association takes note of the relative vagueness of this notion as to detail, and approves the recommendation by the high level group of flexible implementation according to local/regional circumstances. The Association would like to see focus placed on efficient and flexible high quality services, at sea, in harbours and on relevant land links. The Association feels that the configuration of the motorways of the sea should be governed by market conditions, as a general rule, and observes with reticence the somewhat vague suggestion in the report that the sea links could take the form of public service obligations as well as the suggestion that a sea motorway may consist of a sea link between two points. In the opinion of the Association, Sea Motorways should be seen primarily as an open commercial network, possibly comprising long land links between two or more harbours, but where sea transport is a key component to make the link work and that meets certain quality criteria as regards the sea leg and adjacent logistic service, harbour and terminal functions (quality label).

The Association in this context would like to draw attention to relevant New Neighbourhood programmes and to the importance of co-ordinating them with TEN-T as regards transport and transport infrastructure in and around the Baltic Sea.

As for financing, the Association, beyond the general views provided above, feels that, as a matter of practical policy, it may be easier to introduce PPP:s with respect to crossborder

projects, and that this may pave the way for a more extensive use of PPP:s where political difficulties exist. Irrespective of the context, the Association would like to stress the need for clear rules on procurement, concessions, state aid and transparency, responsibility for political risk, whereas most other elements could be configured on a case by case basis.

The Association finally reiterates its support for the general transeuropean approach and the institutionalised co-ordination, promotion and review of the implementation of the TEN-T Guidelines recommended by the high level group.

Yours sincerely

Stefan Back
General Secretary