



EUROPEAN COMMISSION  
IMPACT ASSESSMENT BOARD

Brussels,  
D(2011)

**Opinion**

**Title**                                    **DG MOVE - Impact Assessment on: Revised Union Guidelines for the development of the Trans-European Transport Network**  
  
**(draft version of 15 April 2011)**

**(A) Context**

This impact assessment accompanies a revision of the guidelines defining the Trans-European Transport Network (TEN-T) policy. The TEN-T policy review was opened by the Green Paper "Towards a better integrated trans-European transport network at the service of the common transport policy" published in February 2009. The revised guidelines will aim to define a long-term strategy for the TEN-T policy that would contribute to the transport sector meeting the goals of the White Paper on transport "Roadmap to a single European Transport Area – Towards a competitive and resource efficient transport system" adopted in March 2011.

**(B) Overall assessment**

**The IA report needs to be improved in several important aspects. Firstly, it should be clearer about the objectives of the foreseen revision of the TEN-T guidelines, and should explain whether trade-offs or complementarities exist between them. Secondly, the report should briefly present in the main text all the policy options initially considered, and clarify the criteria used to discard some of the options. On that basis, the report should consider analysing in greater detail some of the alternative options which are likely to achieve the proposed objectives. Thirdly, the report should improve the assessment of economic, environmental, employment and implementation impacts. Finally, the report should better substantiate why the expected positive impacts are likely to be higher in policy option 2 compared to policy option 1.**

**Given the nature of these concerns, the IAB requests DG MOVE to submit a revised version of the IA report, on which it will issue a new opinion.**

**(C) Main recommendations for improvements**

**(1) Clarify the objectives of the proposal and explain the links between them.** The report should be clearer about the objectives of the foreseen revision of the TEN-T guidelines, and should explain whether trade-offs or complementarities exist between the defined objectives. In particular, the report should provide much greater clarity on how a balance between the objectives will be ensured in practice, such as on the one hand, improving the competitiveness of the EU economy or ensuring that EU funds are allocated to TEN-T projects with highest EU added value and, on the other hand, the objectives of territorial cohesion and comparable accessibility to the core network for all EU citizens and operators. The objective related to the standards for management systems and harmonisation of operational rules on the TEN-T projects of common interest should also be explained in greater detail.

**(2) Improve the presentation of options, and consider assessing in greater detail a wider range of policy options.** The report should briefly present in the main text all the policy options initially considered, and should clarify the criteria and the process used to discard some of the options. It should better explain the content of each option, justify why only two policy options are retained and analysed in depth, and should consider analysing in greater detail some of the alternative options which are likely to achieve at least some of the proposed objectives (for instance policy options A5B4 and A1B4 from Annex 3). The differences between the baseline scenario and policy option 1 should be better explained and the rationale for retaining option 1 for in-depth assessment should be clarified – the description of option 1 seems to indicate that this option is based on a bottom-up and unimodal approach, while this approach has been identified as one of the drivers of current problems. The assessment of option 2 which suggests significant changes in the structure of the transport sector, in particular due to its multimodal approach should be better substantiated.

**(3) Improve the assessment of impacts.** The report should explain why the results of the quantitative analysis of the expected impacts could not be used. It should attempt to provide at least the order of magnitude of the impacts, or explain why this is not possible. The description of environmental impacts should be improved and should include a more thorough assessment of the "rebound effect" expected to occur due to the improved infrastructure leading to larger traffic volumes. The impacts on employment and their link to the investment needs estimated need to be further developed. When discussing the security impacts, possible overconfidence due to improvements in safety should be also considered. More evidence on the competitiveness impact should be added as well. Finally, the report should discuss in greater detail how the expected impacts of policy options are likely to be affected by the implementation aspects and by the budgetary constraints faced by Member States.

**(4) Be clearer about the differences in expected impacts of policy options.** The report should better substantiate and explain in greater detail why the expected positive impacts are likely to be higher in policy option 2 compared to option 1 and any other option to be assessed in the main text. This should include a fuller discussion of the estimated investment needs under the baseline and the policy change options and how the options' relative differences drive the expected impacts on traffic, GDP and jobs. Finally, the report should clarify to what extent the expected impacts of the preferred option are likely to change depending on the final definition of the core TEN-T network and the selected multimodal corridors along the core network. The link with national transport plans should be improved.

*Some more technical comments have been transmitted directly to the author DG and are expected to be*

*incorporated in the final version of the impact assessment report.*

**(D) Procedure and presentation**

The different positions of the stakeholders should be transparently reflected throughout the report. Proportionality and subsidiarity should not be used as comparison criteria, but as a condition that needs to be met. The last column of the table of Annex 3 should be removed.

**(E) IAB scrutiny process**

Reference number	2011/MOVE/009
External expertise used	No
Date of Board Meeting	18 May 2011