

Civil Association “Eco-sense”
Comments on the High Level Group report on TEN-T extension to the neighbouring countries

Question 1.

Do the five main transport axes highlighted in the High Level Group (HLG) report, in your view, represent the main axes for international traffic and what would you add/delete, if given the opportunity, and why?

- Rehabilitation of the railway line along Corridor X

*South-Eastern Axis; Regional project 8a: Rehabilitation of the railway line Tabanovci-Gevgelija
Regional project 8b: Rehabilitation of the railway line Tabanovci-Gevgelija (phase 2)*

The Macedonian Ministry of Transport has identified the rehabilitation of the Railway Corridor X as a priority project and it has asked the European Commission to financially support this idea. Eco-sense considers that there are other priorities and potentials for rail transport than the forcing of Corridor X. Macedonia has a need for a well-functioning railway system which cannot be realised by supporting only parts of a network, but on the contrary, by investing into Corridor VIII and creating the missing link between Albania and Bulgaria and investing in local lines which would bring benefits to the public. Also, there are great potentials for developing a functional and unique rail urban transport scheme in Skopje, such as the schemes in large EU cities. We believe that investing in the local rail lines and sustainable urban transport schemes is more important and beneficial to the public than the financing of an existing Corridor.

We believe that such a decision would enable Macedonia to enjoy the advantages of a whole rail network. (Please see the attached case study on the issue).

- Road upgrading Corridor X

South-Eastern Axis; Regional project 24: Road upgrading Demir Kapija- Udovo-Smokvica

According to the PHARE study “Transboundary Programme for the Demir Kapija- Gevgelija section” the section of Demir Kapija- Smokvica has the lowest IRR compared to the other sections of the road. The criteria mentioned in the HLG report say that “Only projects with a sufficiently high economic rate of return, about 6%, should be considered.” This is not the case with this road Demir-Kapija-Udovo-Smokovica, because the overall return rate is 4.4 % for one scenario and 3.0 % for a second scenario. Therefore, the project does not meet this criterion.

The chapter on criteria says that the proposed projects should meet the following criterion on environmental sustainability: “Reduction in air pollution, noise, greenhouse gases and other environmental impacts including the issue of biodiversity, e.g. through changes in the existing modal shift, re-routing to environmentally friendlier modes or infrastructures or through a reduction in congestion.”

The Demir Kapija gorge has been protected since 1960 as a Monument of Nature (Third category under IUCN) and the region around Celevecka River has been protected since 1963 and placed in the category of individual animal habitats under the National Environmental Action Plan of Macedonia. The EIA study for this project proposes that it would be better not to undertake any activities for the upgrade of the road because the works around the tunnels will create unbearable conditions for the survival of endangered and rare species such as vultures and other birds, reptiles and amphibians. Therefore pursuing the project does not meet the above criterion either.

The EIA study for this project also mentions that there is a high archaeological sensitivity in the area of the highway. We strongly believe that protecting the archaeological and cultural sites should be one of the criteria for the selection of the projects.

Question 2. The HLG report outlines a number of measures, on so-called horizontal issues, are these the most important ones and do the recommendations made by the Group help to solve the problems?

- Ensuring that Strategic Environmental Assessment is carried out on the plans for development of the corridors

The law on Environment in Macedonia was just adopted in 2005 and it covers the procedure for conducting the Strategic Environmental Assessment process. However, according to the law, the procedure is not complete as it needs several more regulations to define it better. This is especially needed in terms of public consultation processes (at the moment covered by one article in the law).

Macedonia does not have the experience in conducting SEAs and the only environmental assessment is carried out on concrete projects (EIA) leaving the risk for damaging the broader environment. Also, the interconnection of the projects is not reviewed. Therefore, the EC should ensure that SEA is carried out for the plans to extend the TEN-T network and clearly state whose responsibility it is to carry this out.

- Ensuring sufficient public resources for maintenance of regional transport networks and promotion of sustainable transport modes

TEN-T projects require a large amount of finance and are in danger of crowding out investment in smaller projects on the local and national level, which benefit citizens more directly than the TEN-T projects. For example every year, The Macedonian Road Fund spends 70% of the total transport budget on constructing highways.

TEN-T's emphasis on international routes encourages government tendencies to embark on grand mega-projects, at the price of neglecting local transport improvements. CEE Bankwatch Network calls on the EC to ask Neighbouring Country governments for firm commitment and data that prove sufficient public resources for the maintenance and improvement of local networks and sustainable modes of transport.