

D. 2577/06

SF 3.800/9.500/9.511

PUBLIC CONSULTATION

High Level Group on the Extension of Major trans-European Transport Axes to the Neighbouring Countries

QUESTIONS TO THE STAKEHOLDERS

Questions

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 you add/delete, if given the opportunity and why?

As far as maritime transport is concerned the five axes are logical since they cover the main traffic generating areas in Europe.

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?

As the representative body of the European Shipping sector we will concentrate in our replies on general remarks on the suggestions made on Motor Ways of the Sea:

- The intentions of the report to take measures to meet the increasing demand of fast and reliable transport that is environmentally friendly are fully supported by ECSA.

- ECSA has been directly involved in efforts to promote short sea shipping as an alternative transport mode. The result of these efforts is that short sea shipping has increased since 1992 by more than 9 % i.e. at the same pace as road transport.

The promotion efforts should continue and be further enhanced. In this context particular attention should be given to bottlenecks such as documentary procedures (e.g. customs) and liberalization of port services.

- Support initiatives such as Marco Polo and TEN-T can be helpful, however it should be avoided that the competition with existing short sea services is distorted. Therefore the preference of ECSA goes to support in investments in infrastructure and hinterland connections. The present congestion in ports gives evidence that measures are necessary in this respect.

- The Short Sea Promotion Centers that exist all over Europe play a first line positive role and should be supported by public funding.

- The misconception that Motor Ways of the Sea are only new services that should link two specific ports should be abandoned. As ECSA has expressed repeatedly there are today a very large number of very efficient quality short sea services. The last decennium a lot of new services have been launched. These services are best practice examples of Motorways of the Sea. Limiting Motorways of the Sea to new artificially created services would be a wrong and counterproductive policy. Also the neighboring countries of the EU are served today by many existing commercial maritime services.

- *Motorways of the Sea cannot be compared at all with motorways on the land which are indeed connecting two fixed points. In short sea transport we are rather dealing with markets that have to be connected having a wide choice of ports connecting the relevant areas. The most efficient ones will be chosen and may change in flexible operational patterns and strategy. Concentrating artificially on two ports at each end of the trade and excluding thereby others would moreover result in congestion in predelivery connections to the selected ports. The flexibility of the choice between a number of ports is an advantageous edge for efficient shipping services that should not be distorted.*

- *On maritime safety, ECSA fully supports that this should be dealt with on an international basis through the IMO. The priority should be the ratification and application of existing legislation and the control on its application.*

3. Financing transport investments is a headache. How can the implementation of these axes and horizontal measures be best financed? What could be the role of the private sector and the user charges?

In short sea shipping enormous investments have been made by the private sector in short sea ships and in logistic systems. This will continue.

As mentioned under question 2 public support should avoid distorting competition with existing services and by preference concentrate on infrastructure and hinterland connections and on supporting the short sea promotion centers.

4. For the implementation and coordination of the recommended actions, the report calls for either a memorandum of understanding or an international agreement – do these help to achieve the objectives? If not, how would you ensure the implementation and coordination of the actions?

5. The Group has envisaged integrating the existing agreements and memoranda of understandings into a coherent framework. Should an international treaty be envisaged for this?

Reply to questions 4/5

ECSA supports initiatives that are aiming at a seamless traffic across borders. In this respect agreements on customs controls and procedures can be very helpful. The request of the MIF (Maritime Industry Forum) to find a solution for so called “infected ships” that are calling also non-EU ports in their intra EU sailing schedule e.g. a ship serving the North Europe-Spain/Portugal route but also calling Morocco should be solved soonest. Also intra EU some more measures are necessary on documentary procedures.

10/03/06