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Comments on the report of the High Level Group on the TEN-T Recommendations for the revision of the TEN-T guidelines

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European Barge Union



European Federation of Inland Ports



Verein für eur. Binnenschifffahrt und Wasserstraßen



European Dredging Association



European Shipowners Organisation



Inland Navigation Europe



The trans-European transport networks are of vital importance in ensuring seamless freight flows across an enlarged EU. The report of the high level group formulated balanced recommendations with regard to the revision of the TEN-T guidelines in favour of a more integrated and intermodal network. The criteria for the selection of project priorities and horizontal issues are fair and pertinent and support the corridor approach for efficient and sustainable exchanges within the internal market.

- + fair selection criteria
- + a coherent sum of projects and horizontal priorities
- + corridor approach with attention for intermodality
- + more coordination of preparatory works, assessments and financing
- constraints related to adequate financing and time horizon

Although the investments necessary to carry out the recommended priority projects of the TEN-T represent on average only 0.16% of GDP which should be perfectly feasible without endangering national budgets, concerns about funding remain. There is no doubt that Member States in principle acknowledge the socio-economic added value of cross-border projects. Nevertheless, experience learns that, in absence of a strong European framework, financial commitments for mid and long term plans are often shelved.

Waterways

It is appreciated that the high level group selected two corridors for waterways instead of single projects. The group recognised the need for strengthening alternatives on the east-west axis and on the north-south axis. This approach sustains reliable international freight flows and hopefully will lead to better cross-border coordination between the involved Member States.

Rhine-Main-Danube

The group rightly stresses the importance of an adequate water draft for the selected axis, in particular for the stretch Straubing-Vilshofen. It is highly recommended to maintain a guaranteed draft of at least 2.5m during all seasons in the upcoming revision proposal of the TEN-T guidelines. In order to develop long-distance and reliable inland shipping services on this increasingly congested corridor, the time horizon for carrying out the necessary works should be reviewed.

Seine-Scheldt

The group rightly considers that the Seine-Nord connection presents a high European added value and would have appeared in list 1 if a firmer commitment from one of the involved countries had been made. The undersigning organisations trust that such a commitment will be made in the near future, so that it will be possible to firm up an earlier completion date to solve the urgent congestion problems along that corridor.

The undersigning organisations recommend including these two projects within the upcoming revision proposal of the TEN-T guidelines. It is important to note that investments in waterways bring additional gains since projects can take care of multiple goals at once from transport to recreation, water supply and flood protection. New project plans today attach special attention to nature restoration and development to mitigate short-term effects and maximise the ecological value of the water environment.

The group is fully aware that inland waterways have suffered from a chronic lack of investments. While it is understandable that the group's analysis supports the Commission's position that the dedicated rail freight network needs subsidy rates up to 50% in order to be competitive, it is to be feared that such a selective policy –if it were implemented- leads to imbalances and distortions between environmentally friendly transport modes. The undersigning organisations expect that the Commission also will give its full political support to the proper maintenance of important TEN-T waterways within the framework of the annual and multi-annual programmes by formulating adequate financial provisions up to the rate of at least 20%.

With regard to the maps, more accurate and user-friendly charts for the revision outlining the transport axis on the one hand and the specific bottlenecks on the other would be useful.

Finally, the TEN-T waterways were left out by accident from the current TEN-T in figures in the EC publications "TEN-T priority projects" (Memo) and "Priority projects for the TEN-T network up to 2020" (Memo).

River Information Services (RIS)

The group's recommendation to add the pan-European implementation of RIS to the thematic priorities is positive. RIS indeed will contribute to more safety and efficiency within inland navigation, but will also optimise its role within intermodal transport. A framework directive is a first step towards harmonised implementation. A deployment plan and appropriate financial support will be necessary to enhance effective coverage of the European waterways.

Motorways of the seas

The group recommends integrating the required legal provisions to encompass motorway of the sea projects in the guidelines. Developing the concept of motorways of the sea is indeed a smart tool to bypass land bottlenecks. In order to reach the major sites of industry, commerce and consumption in Europe's hinterland, the port-to-port services have to be completed with congestion-free door-to-door concepts. Shipment further inland by water has the added benefit of further reducing dependency on long haul road transport.

Financing

A sound financial framework is necessary to avoid that governments are buying more time than our society and economy can afford. Since the introduction of a Community charging policy for all modes has turned out to be a long term exercise, it is indeed important to calculate which % can be covered by private capital and secure financial sources for the public-type investments. The Eurovignette directive perhaps can mark a first step allowing cross financing, but the EP suggestion to **create a European Transport Fund also deserves further examination**.

Nevertheless, the allocation of funds should be in all cases linked to the qualitative and quantitative contribution of a project to maintain Europe's competitiveness, while ensuring a more balanced transport development. In that respect, big scale projects should not overshadow smaller projects with a higher added value for the internal market and sustainable mobility.

As regards inland shipping, public-private partnerships are a suitable formula for transhipment interfaces, but investment in waterway infrastructure remains a public issue. This is largely due to the multiple functions in waterway management. Besides transport, waterway development covers tourism and important public functions such as flood protection, nature conservation, alternative energy power and water supply for households, industry and agriculture. If the group emphasises that investment projects in the transport sector have a life of many decades for the benefit of future generations, the long-term societal gain is obviously even more significant for waterways.

This is an additional strong argument to remove the discrimination between the two environmentally sound modes rail and inland navigation in the EC proposal of 2001 with regard to the increase of Community assistance up to 20%.

More coordination

The idea of coordination entities for cross-border projects is welcomed. If equipped with a powerful status, they may give an important boost to this type of projects thanks to a coherent and strategic vision and coordinated fundraising. The set-up of common structures should of course not delay mature projects.

A reflection about a more integrated approach to assessments is urgent. The way of carrying out assessments forms an integral part of elaborating a vision on the development of the TEN-T itself. Since this vision incorporates the goals of sustainable development relying on a sound economy, society and environment, a strategic assessment should combine in its cost-benefit analysis economic, societal and environmental values. The long-term effects to be examined include prospects for viable and competitive exchanges, sustainable and safer mobility, reorganisation of transport patterns towards optimising spatial development and minimising land fragmentation. Additional benefits beyond transport should be considered as a plus.

If a comparable set of criteria is applied for all projects taking account of the specific barriers and potential alternatives along each axis, projects can be assessed more systematically and compared on their merits.