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Sent: Friday, August 29, 2003 9:55 AM

To: TREN TEN TRANSPORT REVISION

Cc: Erkki Leppäkoski; Stephan Gollasch; Chris Hopkins; Zoltan Waliczky

Subject: Comments on the Community Guidelines for TENS

To:

The European Commission

Directorate-General for Energy and Transport

TEN-T Revision

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CONSULTATION ON THE REVISION OF

DECISION No 1692/96/EC OF THE EUROPEAN PARLIAMENT

AND THE COUNCIL

of 23 July 1996

on Community guidelines for the development of the Trans-European

transport network (TEN)

As persons actively engaged in European biodiversity conservation, and the study and management of alien species, we wish to comment on the Community guidelines for the development of TEN.

We note that Mr Karel van Miert's group of EU experts has recommended to the European Commission to include the Rhine/Danube waterway in the priority list of 18 projected Trans European (transport) Networks (TEN) to be completed before 2020. It is the first time a waterway has been included in a proposed TEN programme.

We understand that the North Sea/Black Sea link has also been included and that there is pressure in some quarters to include it in the final European programme to be completed this autumn. The experts

want the Danube to have a guaranteed depth of 2.5 m between Straubing and Vilshofen by 2013, between Vienna and Bratislava (2015), between Budapest and Mohacs (2014) and between Romania and Bulgaria (2011). The Rhine/Danube project also includes a recommendation to improve navigation on the river Maas in the Dutch province of Limburg. It also appears that there has been pressure to include the Seine-Nord project, linking Le Havre, North France, Belgium and the Netherlands, in the priority list, but that this has been shifted to a secondary list of projects.

We urge that the European Commission rapidly prioritizes the planning and implementation of a dedicated Strategic Environmental Impact Assessment (SEA) concerning the proposed TEN initiatives. This is necessary on the grounds that the potential adverse impacts from inter alia the introductions and transfers of invasive (also called alien or non-indigenous) species affecting the conservation, restoration and protection of vulnerable species, habitats and ecosystems have not received adequate attention in the proposal. The serious ecological and economic impacts of invasive aquatic species in European inland, brackish and marine waters have been emphasized in the book edited by Leppäkoski, Gollasch & Olenin published in 2002:

<http://www.wkap.nl/prod/b/1-4020-0837-6>

as well as the 2002 Progress Report for the Fifth International Conference on the Protection of the North Sea:

<http://odin.dep.no/md/nsc/report/022001-990321/index-dok000-b-n-a.html>

It must be noted that shipping, including that connected with inland waterways, is the most prevalent vector affecting the spread of invasive aquatic species throughout Europe.

The European Union Member States must be seen to be actively committed to carrying out their obligations as Contracting Parties to the various important international conventions, agreements and instruments contributing to the conservation, restoration, and protection of biodiversity. These include the Convention on Wetlands of International Importance, especially as Waterfowl Habitat (Ramsar Convention), the Convention on the Conservation of European Wildlife (Bern Convention), the Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention), the Convention on Biological Diversity (CBD), the Convention on International Trade in Endangered Species of Fauna and Flora (CITES), the Convention on the Protection of the Marine Environment of the North East Atlantic (OSPAR Convention), the Convention on the Protection of the Baltic Sea Area (Helsinki Convention), and the European Union instruments such as the Wild Birds and Habitats Directives. Many of these, together with Biodiversity Action Plans, clearly underline the obligation to combat, control and regulate the spread of alien species.

The Strategic Environmental Assessment (SEA) Directive entered into force following its publication on 21 July 2001 in the Community's Official Journal. The Member States have until 21 July 2004 to put in place the laws, regulations and other administrative provisions necessary to implement the detailed requirements of the Directive. The SEA Directive requires a formal environmental assessment by the appropriate authorities of a wide range of public plans and programmes with significant effects on the environment. SEAs are mandatory for all plans or programmes which set the framework for development consents for individual projects (as listed in the EIA Directive) when they are either in the fields of agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, or where they have been determined to require an assessment under the Habitats Directive (92/43) in view of their likely effect on Natura 2000 sites.

Yours truly,

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