

TEN-T Days 2010: Trans-European Transport Networks

ZARAGOZA 8-9 JUNE 2010
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TEN-T POLICY REVIEW: STAKEHOLDERS CONSULTATION SESSION 9 JUNE 2010 – 9:00-11:30

CONTRIBUTOR

SECTOR	CLECAT – European Association for forwarding, transport, logistics and customs services
COUNTRY	Belgium
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ORAL INTERVENTION REQUEST

YES NO

CATEGORIES OF CONTRIBUTIONS

1. General Policy Objectives	6. Financing-/Funding Instruments
2. Core Network Planning Methodology	7. Legal Issues
3. Comprehensive Network	8. Non-Financial Instruments
4. ITS	9. Integration of Transport and TEN-T Policy
5. New Technologies	10. Other Policy Areas in the TEN-T Framework

CONTRIBUTIONS (3 out of 10 categories)

Category (1. General Policy Objectives)

- CLECAT has been pleased to see the Commission's preference of moving toward the option of a dual layer planning approach with a core network and a comprehensive network, which is what CLECAT, as well as many other stakeholders, were advocating in the previous consultation on the green paper. We are confident that on the basis of the evaluations and consultations, and in addition to what will now be said in Saragossa, the Commission will be able to achieve a consistent and satisfying re-modelling of the TEN-T system. Recalling our recent submissions on the topic we hope that we will now see a swift implementation of the ideas brought forward by CLECAT and others. To this end we expect the event in Saragossa to be a good opportunity to reiterate our position and assist with further explanations, if necessary.
- We are pleased to see that the Commission explicitly points out that it is important to develop a

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homogeneous network planning to reduce missing and isolated links. The TEN-T needs an overall strategic vision, rather than what has been a patchwork of individual projects that fail to be interconnected.

- The EU will no doubt benefit from the active involvement and agreement of the freight customers in the TEN-T planning process, who are best placed to give advice on present and future demands. For that reason, the setting up of TEN-T policy and TEN-T projects should involve all the concerned actors, i.e. not only of the infrastructure managers and transport companies but also the users of the TEN-T.
- As regards the TEN-T policy objectives of planning a core network, some consideration is necessary when dealing with the following concept: *"Planning a core network is not meant to initiate a new infrastructure programme of immense scope neither: ensuring continuity for ongoing projects, giving due attention to the removal of key bottlenecks and building largely on existing infrastructure, it aims at becoming the basis for an efficient, less carbon intensive, safe and secure transport system"* (page 5). The TEN-T policy related measures must be given the political power to become incisive in the removal of bottlenecks and should not be afraid to suggest the need to build or update infrastructure, where needed. CLECAT believes that a corridor policy may be an exceptionally useful instrument in overcoming the obstacles that a persisting national perspective tends to maintain in EU policy choices as well as in dealing with the issues of *"monetising non-monetisable effects such as cohesion"* and balancing *"conflicting objectives"* (page 8).

Category (3. Comprehensive network)

- On the planning process of the comprehensive network, CLECAT would like to highlight that it fully agrees with the Commission that it should "link all EU regions in an adequate way, be multimodal and provide the infrastructural basis for co-modal services for passengers and freight". On this last point, we remind the Commission of the importance not to set up a network that imposes the systematic priority of passengers over freight services. Freight must be delivered on time as agreed with the customers and for this reason passenger services should not be given automatic priority, even when it is not strictly necessary, as it invariably happens today. The future TEN-T must fight against rail freight being a secondary choice for customers, which is one of the reasons for rail freight's decline.

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- The various needs that have been identified in planning the comprehensive network¹ may not play an equally strong role in policy strategy, which would suggest the need to establish priorities between them, no matter how politically unpalatable. The ambition to achieve a comprehensive network should not be confused with an inconclusive caucus of ambitions without practicality. Priorities must be identified and negotiated in order to achieve the creation of an efficient TEN-T network. CLECAT would like to highlight in particular the importance of strengthening and enlarging the scope of the reference beyond relevant EU relevant environmental legislation. Economic growth and employment are as important as the environment with regards TEN-T policy, which is about cohesion and integration (including connecting productive settlements that are located in environmentally protected areas). A wise planning of continental corridors must allow some give-and-take between environmental and development factors, by ensuring that the possible environmental impact observed in the development and the enlargement of a corridor is counterbalanced by appropriate environmental trade-offs in other areas.
- **CLECAT is pleased to see that the Commission explicitly recognises the role of the comprehensive network to guarantee important implementation progress on Community legislation in transport (e.g.: rail interoperability) and other sectors. As we mentioned during the previous consultation, it is very important that future legislation on TEN-T policy should not be just one more EU instrument among others for transport but should instead go further and contribute to unify the overall picture of freight corridors within a coherent strategic vision. We would like to highlight for instance the opportunity that the TEN-T represents in enabling freight transport users to benefit from an efficient deployment of the ERTMS technology and of the green corridor concept;**
- **We want to highlight the importance of urban nodes in future TEN-T policy as it is a component of the logistics chains that should not be left aside from the TEN-T network. It is useless to have an efficient network if problems are still encountered in the last mile of delivery. On this point, access to terminals in the TEN-T network should be more transparent concerning national safety rules and track access + charges.**

¹ “a reference for land use planning; a geographic reference for other policies; a reference on the requirements of the relevant EU environmental legislation and policies, in particular on the protection of biodiversity; a target for technical and legal requirements on interoperability and safety; the accommodation of technical standards to enable effective modal integration with the aim of door to door co-modality”. (page 4)

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Category (8. Non-Financial Instruments)

- **In principle, CLECAT has nothing against the Commission's idea of setting up a European funding framework to coordinate EU instruments for transport. However, it is essential that this framework does not become a new factor of administrative burdens for stakeholders interested in using EU transport funds and that it ensures a fair and strict earmarked distribution of those funds. In addition, as we mentioned in our previous reply, the division of funded projects between the study research phase and the real infrastructure building would allow a fairer and adequate distribution of financial funds among TEN-T projects and reduce the risk of endless preparation without any material achievement.**
- **The work described in the working document regarding the creation of a new legal and institutional framework of the TEN-T policy review should ensure better communication and awareness of the Commission as regards its work in relation to TEN-T as well as a more efficient discrimination between projects that are vital, others that are necessary and those that are welcome but cannot pass the array of conflicting priorities we are facing.**
- CLECAT would also like to suggest that an enhanced role of the TEN-T executive agency in proposing the strategy behind the choices to be made for TEN-T projects could be extremely beneficial, especially if the agency is in tune with the users' requirement by means of their institutionalised participation. Whilst coordination with Member States is indispensable, the voice of users must be heard directly if the prioritisation policy wishes to avail itself of the comfort of a relative consensus building. In addition the practical approach of the private sector may contribute to bridging the gap that exists between simply asking questions and taking a proactive attitude such as proposing alternatives for stakeholders to choose from. This latter point connects directly with the policy options that are dealt with at point 5 of the working document.
- Please note that these preliminary comments are sent without prejudice of future more complete submissions that may follow, both at the upcoming meeting in Zaragoza and at a later stage during the consultation programme.

Please submit your contribution until 3 June 2010 (eob) to MOVE-PUBLIC-CONSULTATION-ZARAGOZA@ec.europa.eu