

The European Voice of Freight Logistics and Customs Representatives

Brussels, 21st of February 2011

RE: Commission Staff Working Document: The New Trans-European Transport Network Policy – Planning and Implementation Issues SEC (2011)101

CLECAT represents the interests of 27 national organisations of European freight related service providers. Multinational, medium and small freight forwarders, logistics service providers and Customs agents are all part of CLECAT's constituency, thus making it the most representative structure of its kind. In this function CLECAT has closely followed the discussions initiated two years ago on the TEN-T policy review.

During these two years, CLECAT has continuously submitted its views to the European Commission for all relevant meetings and consultations on the TEN-T review process. We have submitted the following position papers and written contributions to recent Commission consultations:

- [CLECAT position on the Commission Green Paper: A TEN-T policy review¹](#) (April 2009)
- [CLECAT written contribution for the TEN-T Days 2010 in Zaragoza²](#) (June 2010)
- [CLECAT position on the Commission Working Document on TEN-T policy review³](#) (September 2010)

First of all, we are pleased to see that CLECAT's preferred option for the future TEN-T structure, the proposed dual layer planning approach with a comprehensive network and the core network, has been chosen as the preferred overall option by the majority of the stakeholders and by the European Commission. To complement our recent public documents, we would like to stress at this stage of the TEN-T policy debate our general support for the latest Commission Staff Working Document⁴. We would also now like to continue the debate by highlighting what should be the role of this policy instrument once its planning phase has been finalised. The publication of the Commission Staff Working Document indeed represents a good opportunity for CLECAT to comment on the following points which we think should be duly considered by the European Commission in its forthcoming high level bilateral consultations with Member States.

- **The cutting of red tapes**

¹ <http://www.clecat.org/dmdocuments/pp008osecr090427greenpapertent.pdf>

² http://www.clecat.org/index.php?option=com_content&task=view&id=303&Itemid=46

³ <http://www.clecat.org/dmdocuments/pp009osecr100906constant.pdf>

⁴ http://www.europarl.europa.eu/registre/docs_autres_institutions/commission_europeenne/sec/2011/0101/COM_SEC%282011%290101_EN.pdf

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One of the most important opportunities that the future TEN-T policy can offer for the Commission and the Member States is the cutting of red tape, especially in cross-border transport where it is holding back the enhancing of economic development and the integration and completion of the internal market. The lack of coordination between neighbouring countries, especially across an EU/non-EU border, makes trade burdensome and less secure. CLECAT has always advocated the simplification of administrative procedures, for example through enhanced possibilities of e-documentation, national single windows and enabling better technological solutions (e.g. in the area of communication). We therefore consider as essential that the Commission and Member States both continue to be fully committed to the use of TEN-T as a policy instrument to fight against the lack of interoperable networks, for instance concerning ITS applications and interoperability programs such as the European Rail Traffic Management System ERTMS, River Information Services RIS, Single European Sky Air Traffic Management Research Programme SESAR and Vessel Traffic Monitoring and Information System VTMIS.

- **The resolution of bottlenecks**

CLECAT is pleased to see that the European Commission is determined to use the upcoming new TEN-T policy to tackle missing links in Europe, notably in cross-border sections, and we understand this attitude as a more general ambition to address the persistent problems of bottlenecks in Europe. On this issue, we would like to remind the Commission that CLECAT took part in the Commission's Bottleneck Exercise of 2007, and was one of the leaders of the three Working Groups. Already back then, the work achieved was on its way to providing excellent and bureaucracy free solutions to the problems of bottlenecks, which usually result from a lack of infrastructure as well as administrative difficulties. CLECAT would like to propose that the work that was undertaken in that respect would be taken into account during the implementation of the new TEN-T, as many bottlenecks have already been identified during this exercise. This information could feed into the bilateral consultations between the Commission and Member States. CLECAT would be able to provide more details on this topic, if the necessary information is not in the hands of the Commission anymore.

- **Harmonised TEN-T development throughout the EU**

CLECAT is convinced that the new TEN-T to be implemented by the Commission and Member States should be used as an opportunity for a harmonised development of transport infrastructure across the EU territory. It is essential that mistakes of the past do not repeat themselves and that the TEN-T does not become once again a patchwork of individual national networks during its implementation phase. We agree that priorities will have to be established but EU interests should nevertheless be promoted in order to have a true TEN-T with EU added value, delivering a TEN-T that would be environmentally sustainable and economically viable for the benefit of the entire EU. TEN-T is a very useful instrument provided by the Commission for Member States and it should be used to address issues like the imbalance of traffic flows between north/south ports, which generates additional traffic throughout the Alps, as well as the unequal infrastructure development between East and West. CLECAT would finally like to mention that the European Commission has an important role to play in order to guarantee a coordinated (and as synchronised as possible) implementation of TEN-T projects between Member States.

- **The importance of infrastructure funding inside and outside of the TEN-T**

At this stage of the debate on the TEN-T policy review, CLECAT would like to say that despite the fact that TEN-T generates a broad support by a variety of stakeholders (including CLECAT), we

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would however remind the Commission and the Member States that the new TEN-T policy should not be seen as a panacea for infrastructure development in Europe: transport infrastructure funding is a broader topic than TEN-T. While we acknowledge the importance to prioritise investments and to enhance the infrastructure of the TEN-T projects, there is the inherent danger that other important infrastructure projects are not receiving their fair share of attention. CLECAT supports the goal of the TEN-T, which is to create a transport network that enables efficient long-distance transport throughout the EU, but a pre-condition to achieve this goal is that the other already existing transport infrastructures are exploited in the most optimised way in order to feed the future TEN-T network. CLECAT therefore recommends that the European Union pays due notice to smaller national developments as they could determine the overall success of this important EU policy instrument that is TEN-T.

To conclude, CLECAT would like to stress once again the general support of its members for the outcome of the latest consultation and plans for the TEN-T review which are outlined in the Commission Staff Working document. We would welcome the opportunity to discuss how CLECAT can further assist in the process, if the European institutions think it would be beneficial.