



RESPONSE OF THE ATLANTIC ARC TRANSPORT GROUP TO THE CONSULTATION ON THE FUTURE POLICIES OF THE TRANS-EUROPEAN TRANSPORT NETWORK

September 15th 2010

The Atlantic Arc Commission - Transport Group (AATG) has participated regularly in the different consultations (the latest in April 2009, motivated by the publication of the TEN-T Green Paper: COM (2009) 44 final) and the workshop Days (the latest in Zaragoza, 8th-9th June 2010) which the European Commission has organised as part of the review of EU policy on the Trans-European Transport Network (TEN-T).

In these cases, the AATG has prepared the relevant technical contribution documents either in its own name in collaboration with the Conference of the Atlantic Arc Cities (CAAC), or as an integrated part of the Atlantic Arc Commission or of the Conference of Peripheral and Maritime Regions of Europe (CPMR).

Maintaining this spirit of collaboration, the AATG has prepared this current document to take part in the public consultation on the future policies of the TEN-T opened up by the European Commission, a consultation which will be closed on 15th September 2010.

As a preliminary remark, the AATG wishes to make three general observations on the documents submitted for consultation:

1. The AATG considers that the documents submitted for consultation have a character which is excessively generic, theoretical and conceptual and that this impedes the regions from taking a clear and definitive positioning with respect to the proposals they contain.
2. Given the methodological elements proposed for the planning of the TEN-T, and in the face of the scenario of change (geographical, economic, energetic...) which is approaching, a necessary element which the documents lack is an initial vision of the transport model to be established in Europe.
3. As was announced in the AATG's earlier contribution at the time of the publication of the TEN-T Green Paper, there is still a lack of recognition of the role of the regions (some of whom have broad competencies in territorial planning) in the planning and configuration phase of the Comprehensive Network and the Core Network of the TEN-T.

Responses are provided below to the seven questions that the European Commission has put forward (included in the document COM(2010) 212 final) to orientate the public consultation.

This document has been submitted to the consideration of the member regions of the Atlantic Arc Commission and has incorporated their observations and comments.

Are the principles and criteria for designing the core network adequate and practicable? What are their strengths and weaknesses, and what other factors should be taken into account?

Firstly, it should be commented that the general definition of the Core Network creates uncertainty with regard to its objectives because these are so general. It only mentions that they will form part of EU policies in transport and other sectors which are not specified.

In the same definition, it is thought necessary to add that the Core Network will also constitute an important North-South (not only East-West) link among older member states and between these and the networks of third countries (eg, North Africa).

With respect to the criteria and principles for the configuration of the network, the AATG considers that although the series of criteria included is sufficiently complete, the series of principles offers very little that is new. In particular, some criteria (territorial integration, cohesion effects, market needs, commercial flows...) are not taken into account in the principles mentioned.

A more systematic and specific presentation of objectives, criteria and principles is proposed, resulting from a vision of the transport model to be established in Europe including the following needs which are key for the AATG:

- The need for territorial cohesion (to avoid the risk of concentrating funding in Europe's central regions)
- The need to reinforce accessibility for the peripheral regions (for example: promote East-West interconnection to connect the Atlantic regions with the centre of Europe)

The formulation of the Core Network presented (definition, objectives, criteria, principles) suggests that its strong point would be its flexibility: the future configuration of the network is scarcely dependent at all on any particular strategy or vision of the future. Similarly, its weak point, at a time of change, would be its limited contribution to create an orientation for the future or establish planning guidelines for the member states.

Another observation made by the AATG refers to the need to agree on the criteria for the determination of hubs and connections, for both the Comprehensive Network and the Core Network.

For example, confirming the decision to select the main hubs from national capitals, urban centres with population over 1 million, main ports or intercontinental airports, could leave the Atlantic Arc regions (depending on the application of the criteria) with just one main hub - Lisbon - while certain member states with smaller population and economic weightings than some other geographically more-accessible Atlantic regions would have at least one hub in the Core Network.

In the selection of hubs and connections, the AATG advocates the use of criteria and principles which are technical and not political, related directly to the objectives of the Core Network.

In conclusion, the AATG view of the methodology proposed for the planning of the TEN-T is that it is a status quo proposal which simply moves the focus of infrastructure investment towards the east of Europe and third countries' networks.

To what extent do the innovative infrastructure measures contribute to the objectives of a future-oriented transport system, and are there ways to strengthen their contribution?

Note: in the question the concept of "supplementary infrastructure measures" has been replaced by "innovative infrastructure measures" in order to maintain coherence with the text of reference. In the entire COM(2010) 212 final document, the concept of supplementary infrastructure measures does not appear.

The AATG considers that, at a time of change, there is a clearly evident interrelationship between the future transport system and technological development or innovation - or to be more specific, between the future TEN-T and the intelligent transportation systems (ITS), or between the TEN-T and the energy sources which are alternatives to current fuels.

To strengthen this interrelationship, it is necessary to:

1. Foster technological developments related to passenger and freight transport
2. Develop the vision of the future transport system
3. Analyse the technical and economic feasibility of the potential projects
4. Integrate the feasible projects into TEN-T planning work

What role could TEN-T planning in general play in boosting the transport sector's contribution to the "Europe 2020" strategic objectives?

The Europe 2020 strategy proposes economic development based on knowledge and innovation, which is sustainable (greener and more competitive) and integrative (with a high level of employment, which favours social and territorial cohesion)

The AATG states its agreement with the principle that TEN-T planning, as a key element in territorial competitiveness, must assist the European transport of the future to contribute directly to the objectives of this Europe 2020 strategy, for example:

- The new TEN-T must integrate the ITS (as proposed by the Commission's document) in order to develop competitive logistics in freight transport and more efficient modes in public passenger transport. Overall, the application of knowledge and innovation to the transport system (and in particular to the TEN-T) must allow economic growth without necessarily increasing transport needs.

- The planning of the TEN-T must favour change in the transport energy model (today, almost 60% of petroleum products used in the EU is consumed in transport): favouring the modes of transport which are least dependent on oil (rail, maritime transport) and proposing the development of innovative transport infrastructures (adapted to greener transport).
- The TEN-T must also contribute to economic and social equilibrium in European urban areas, without favouring some areas over others, and enabling growth to be distributed evenly. To achieve this, the new TEN-T must offer comparable levels of accessibility to all European territories (although this may be with a different offer of transport modes).
- As well, the TEN-T must bear in mind the strategic character of the Atlantic Arc ports (for the opening of Europe to international traffic) and of the maritime connections among EU member states (whether Motorways of the Sea, coastal shipping lines or others). From this comes the importance of the development of ports, and in particular of secondary ports, to avoid an excessive concentration of flows in the large European ports, creating the risk of a saturation problem.

How can the different sources of EU funding be better coordinated and/or combined in order to accelerate the delivery of TEN-T projects and policy objectives?

Note: in the question, the term sources of expenditure has been replaced by the term sources of funding, since there is no reference to sources of EU expenditure in the COM(2010) 212 final text.

As the Commission's document proposes, the creation of a European funding framework would be a useful instrument for the coordination or combination of different funding sources, including those directly aimed at infrastructures as well as those intended for equipment or services.

For the AATG, a clear European funding structure in the transport field (objectives, instruments, competent authorities, limits and conditions, etc) is becoming more and more necessary given the current multiplicity of instruments and agents (including private sources): the Funding Framework mentioned could provide such a structure.

How can an EU funding strategy coordinate and/or combine the different sources of EU and national funding and public and private financing?

As a continuation of the previous answer, the AATG states its view that coordination between public and private funding sources is necessary, as well as between EU funding sources and those of member states. To bring this about, two framework actions would be necessary:

1. In the first place, a decision must be taken on the criteria for setting European level priorities related to transport infrastructures, equipment or services which are eligible for funding. The new TEN-T would outline the basis in terms of infrastructure for these prioritisation criteria.

2. Secondly, a set of financing rules must be created (eg, within the European funding framework just mentioned) taking into account both public and private sources that are possible, and including sources originating in the EU, the member states and the regions.

For the AATG, the TEN-T review must take into account the initiative launched by the Council of Europe in June 2010 to create a European strategy for the Atlantic Region. The question of connectivity forms part of the priority issues for this space.

The preparation of this strategy must give rise to cooperation among the different public authorities to define priority projects in transport issues, share out responsibilities and mobilise the different European financial instruments in a logical way: the budget of the TEN-T with the ERDF, the cohesion funds and the mechanisms of the EIB.

As such the AATG invites the DG MOVE, along with the rest of the services of the European Commission, to participate actively in these reflections to the end of coordinating this strategy with the TEN-T review.

The AATG wants to address an additional point of detail on funding in relation to the TEN-T: in the entire document of reference there is not a single reference to funding sources derived from the application of highway or urban tolls, pay-for-use of infrastructures, eco-taxes...

The AATG believes that the next review of Guidelines for the TEN-T should include a reflection on the possibility of employing these funding instruments, which are recognised in several European Commission directives.

Would the setting up of a European funding framework adequately address the implementation gap in the completion of TEN-T projects and policy objectives?

For the AATG, the constitution of a European Funding Framework could serve, a priori, to ensure and facilitate funding for those projects which really deserve the highest priority according to EU criteria, as long as there is a real obligation on Member states, who must respect their commitment, especially in financial terms, in transport policy issues.

Nevertheless, the problem is not only a question of available funds but also one of the eligibility of expenses. This is the case with the Motorways of the Sea, where ships are not considered as infrastructures and are therefore not eligible. It is necessary to foster a different way of operating among public authorities with respect to the economic agents and shipping companies in order for these alternatives (Motorways of the Sea) to become truly consolidated, and thus avoid the need for permanent operating subsidies to avoid the disappearance of the services.

Another condition that would contribute to the effectiveness of a European Funding framework would be to ensure the participation of the regional authorities in the creation and implementation of the TEN-T, given that some of them participate directly in the execution of TransEuropean transport projects.



How can the TEN-T policy benefit from the new legal instruments and provisions as set out above?

All the legal instruments and dispositions included in the reference document are deemed adequate and necessary, given that they have been developed by legal experts. Thus, their implementation should result in improvements in reaching TEN-T targets.

In particular, the AATG requests from the Commission a clear legal and institutional framework for the TEN-T orientations. This should make explicit reference to the roles and responsibilities of the different authorities in the different phases (planning, financing, implementation or review).