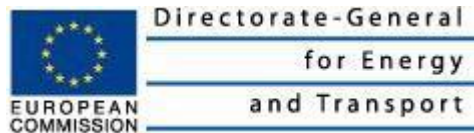


Towards a Better Integrated Trans-European Transport Network at the Service of the Common Transport Policy



Public consultation on the Green Paper: A TEN-T policy review Towards a better integrated trans-European transport network at the service of the common transport policy

Green Paper Questionnaire

General Remark

Please note, that the comments below are to be seen as complementary to the answer provided by CLECAT, to which SIFA, in its capacity as a member of CLECAT, fully adheres. The additional SIFA comments below could not be submitted for integration into the CLECAT comments, owing to time constraints.

The same goes for the multiple choice questions, where selections have been made only where they are additional to those provided by CLECAT. The only exception from this is question 7.

Q01.- Should the Commission's assessment of TEN-T development to date cover any other factors? (optional)

Q02.- Should the comprehensive network be maintained or abandoned, and what advantages and disadvantages would either approach involve? Could the respective disadvantages be overcome, and if so by what means? (optional)

- YES – the comprehensive network should be maintained
- NO – The comprehensive network should be abandoned
- No opinion

Please allocate the advantages as described above to the following categories: (optional)

- Important for access function and territorial cohesion
- Reference basis for structural policy objectives
- Basis for a broad range of transport policy objectives (Help: rail interoperability, road safety etc.)
- Large scope for identification of projects of common interest
- Broad reflection of national infrastructure planning
- Others (please specify above)

Please allocate the disadvantages, as described above, to the following categories: (optional)

- Truly European planning is hardly possible
- Community instruments are insufficient to allow full network implementation
- Community added value of many projects of common interest is questionable
- Community action lacks visibility
- Others (please specify above)

Q03.- Would a priority network approach be better than the current priority projects' approach? What would be the advantages and

disadvantages of either approach, and how should it be developed? (optional)



YES – The priority network approach would be better than a priority projects approach



NO – the priority network approach is not recommended; the current priority projects' approach should be further pursued



No opinion

Please justify your choice by answering the sub-questions of Q03 as comprehensive as possible (compulsory)

A priority network approach could provide more value for money as ideally coherent planning and investment along the network would ensure smooth and efficient traffic flows. An essential factor for success is that means are found to ensure transnational coordination of planning for the corridors that constitute the priority network, with an eye to the needs of the market.

Please allocate the arguments described above to the following categories:

- Advantages of priority network approach (compared to priority projects approach) (optional)



More rational planning approach at European level, including the possibility for coverage of network benefits



Better focussed projects of common interest



Possibility for coverage of all modes



Coherence between instruments (financial and other) necessary for full network implementation and planning objectives as challenge for future TEN-T policy



Possibility for coverage of nodes and inter-modal connections



Enhanced possibilities for “environmental optimisation”



Possibility of better reflection of major European traffic flows and Cohesion objectives



Others (please specify above)

- Disadvantages of priority network approach (compared to priority projects approach) (optional)



Difficult to plan such a network for reasons of planning methodology



Difficult to combine with sovereign national responsibility for infrastructure development



May become too large in scope to ensure sufficient Community funding; thus not much change compared to comprehensive network approach



Others (please specify above)

- Elements that should be taken into account in the development of a priority network approach (planning method) (optional)

- | | | | |
|-------------------------------------|---|--------------------------|--|
| <input type="checkbox"/> | Traffic flows | <input type="checkbox"/> | Interoperability and infrastructure standards |
| <input type="checkbox"/> | Social, economic and geographical cohesion | <input type="checkbox"/> | Minimum capacity requirements |
| <input type="checkbox"/> | Environmental protection / climate change | <input type="checkbox"/> | Intelligent transport systems and new technologies (infrastructure and vehicles) |
| <input type="checkbox"/> | Due coverage of all transport modes | <input type="checkbox"/> | Implementation capacities |
| <input type="checkbox"/> | Inter-modal connections | <input type="checkbox"/> | Harmonized cost-benefit analysis |
| <input checked="" type="checkbox"/> | Connections between long distance transport and local transport / urban nodes | <input type="checkbox"/> | Others (please specify above) |
| <input checked="" type="checkbox"/> | Links to third countries | | |

Q04.- Would the flexible approach to identifying projects of common interest, as proposed with the "conceptual pillar", be appropriate for a policy that, traditionally, largely rests on Member States' individual infrastructure investment decisions? What further advantages and disadvantages could it have, and how could it best be reflected in planning at Community level? (optional)

- YES – a flexible approach would be appropriate
- NO – the proposed flexible approach would be inappropriate for the TEN-T
- No opinion

- Please justify your choice by answering the sub-questions of Q04 as comprehensive as possible (compulsory)

SIFA underlines the particularly high importance of a strong and continuous link to market development and market needs to optimise project selection and planning. A flexible approach to identifying projects of common interest could be an important means to obtain this. This would require a system for facilitation, consultation and benchmarking for each corridor.

- Please allocate the advantages, as described above, to the following categories: (optional)

- Allows to incorporate into TEN-T infrastructure-relevant aspects of a wide range of common transport policy measures on a "rolling basis"
- Allows to promote measures that stimulate efficient infrastructure use along TEN-T axes through several Member States or at Europe-wide scale (e.g. measures that may involve infrastructure works of smaller scope and are not reflected in major projects' maps; may cover actions like Green corridors or rail freight corridors; ITS applications)
- Allows for flexibility where necessary to facilitate the development of commercially viable services
- Others (please specify above)

- Please allocate the disadvantages, as described above, to the following categories: (optional)

Entails uncertainties regarding the specific definition of projects of common interest (consequently uncertainties in terms of cost, needs and possibilities for Community support)

Others (please specify above)

- How could the "conceptual pillar" be best reflected in planning at Community level? (optional)

Through objectives and criteria set out in the TEN-T Guidelines

Through links to relevant Community legislation

Through Comitology measures

Other; Regulatory measures are not enough. They must be supported by efficient coordination and benchmarking mechanisms. This could include elements of comitology, but the essential element should be communication and dialogue within the priority corridors to achieve transborder coordination of planning and investments. It is important to include not only public authorities, but also actors on the market in this system.

Q05.- How can future challenges in the sectors of waterborne and air transport (especially ports, inland waterways and airports) as well as of freight logistics be best taken into account within the overall concept of the future TEN-T development? Do different requirements for freight and passenger transport require different treatment in the TEN-T policy? What further aspects relating to different transport sectors / common transport policy issues should be given attention? (optional)

As a general comment, SIFA would like to add, that the main issue is how to capture signals concerning capacity and other problems and needs concerning infrastructure and such support systems that are part of TEN T priority corridors. Likewise it is important that the needs and requirements of the market place are known to planners and other decision makers. This will make it possible to assess these elements against planning parameters and transport and other policy objectives, such as sustainable transport, energy efficiency, competitiveness of industry, efficient distribution systems and the needs of passenger transport. Specifically for freight purposes, requirements for an optimal implementation of the Freight Agenda and the Logistics Action Plan could be considered. This includes giving adequate attention to the interface between long distance transport and short distance distribution, particularly in urban areas.

-

Q06.- How can Intelligent Transport Systems in all modes, as a part of the TEN-T, enhance the functioning of the transport system? How can investment in Galileo and EGNOS be translated into efficiency gains and optimum balancing of transport demand? How can ITS contribute to the development of a multi-modal TEN-T? How can existing opportunities within the framework of TEN-T funding be strengthened in order to best support the implementation of the ERTMS European deployment plan during the next period of the financial perspectives? (optional)

Q07.- Do shifting borderlines between infrastructure and vehicles or between infrastructure provision and the way it is used call for the concept of an (infrastructure) project of common interest to be widened? If so, how should this concept be defined? (optional)

- YES – the current concept of the infrastructure project of common interest should be widened.
- NO – there is no need for widening the current concept of the infrastructure project of common interest.
- No opinion

- Please justify your choice, and describe how such a widened concept should be defined. (compulsory)

-SIFA would add the following, to justify the above choice.

At a first glance, and subject to an in – depth analysis it would seem necessary to add a reference to support systems or facilities, for instance in the description of what the network comprises set out in Article 3 of the Guidelines.

Q08.- Would a core network (bringing together a priority network approach as referred to in Q3 and a conceptual pillar as referred to in Q4) be "feasible" at Community level, and what would be its advantages and disadvantages? What methods should be applied for its conception? (optional)

- YES – a core network approach would be feasible.
- NO – a core network approach would not be feasible
- No opinion

- Please justify your choice by answering the sub-questions of Q08 as comprehensive as possible (compulsory)

- To which categories would you allocate the main advantages? (optional)

- Strengthening the European planning approach
- Capturing benefits of a network
- Strengthening the network planning methodology
- Combining the "traditional" infrastructure approach (essentially priority network) and a more flexible "conceptual" approach
- Integrating transport infrastructure and transport policy developments in the best possible way
- Establishing a strong basis for concentration of Community support (financial and non-financial)
- Other

- To which categories would you allocate possible disadvantages? (optional)

- Difficulties regarding an appropriate planning method
- High degree of complexity and diversity of projects involved, requiring a too broad range of means for implementation
- Too much flexibility
- Too many network development priorities
- Other

- What basis could be used for its conception? (optional)

- Best practice from national methods (please specify above)
- Available research (please specify above)
- New research (please specify above)
- Expert groups
- Other (please specify above)

- Which are the three aspects that need to be given highest priority in the core network development method? (optional)

- Infrastructure needs in relation to the Lisbon strategy
- Climate change and other environmental objectives

- Common transport policy needs
- Member States' infrastructure master plans
- Financing capacities
- Most efficient infrastructure use
- Technological challenges and opportunities of the future (transport and energy, infrastructure and vehicle)
- Economic sustainability

Q09.01- How can the financial needs of TEN-T as a whole - in the short, medium and long term - be established? (optional)

Q09.02.- What form of financing – public or private, Community or national – best suits what aspects of TEN-T development? (optional)

Q10.01- What assistance can be given to Member States to help them fund and deliver projects under their responsibility? (optional)

Q10.02.- Should private sector involvement in infrastructure delivery be further encouraged? If so, how? (optional)

Where conditions for involvement of the private sector are at hand, benchmarking may be a useful tool to develop good practice.

Q11.01- What are the strengths and weaknesses of existing Community financial instruments used for TEN-T? (TEN-T budget, Cohesion Fund, ERDF, EIB loans)? (optional)

Sewing together financial packages involving several systems is a very complex exercise. Ideally, simplification and better coordination between different programmes could be sought, with, for instance a common helpdesk.

Q11.02.- Is there a need for new financial instruments (including "innovative" instruments)? (optional)

- YES
- NO
- No opinion

- Please explain (compulsory)

Q12.01.- How could existing non-financial instruments be improved? (optional)

.

Q12.02.- Which new non-financial instruments should be introduced, for what reason? (optional)

- Creating bodies for exchange of information, benchmarking and improvement of planning coordination for the corridors of the core network. Such bodies should include both public authorities and market actors and be linked to co – ordinators and the Commission.

- Please classify your proposal above: (optional)

- Corridor coordination
- Open method of coordination
- Sharing of best practices
- Benchmarking
- Setting of investment targets
- Other

Q13.- Which of the options for developing the TEN-T is the most suitable, and for what reason? (optional)



Option A: Dual layer: comprehensive network and priority projects (current structure)



Option B: Single layer: priority projects – possibly in extended form



Option C: Dual layer: comprehensive network and "core network"



No opinion

- Please justify (compulsory)

The concept of a core network could help creating truly transnational corridors with coordinated planning, realistically adapted to available financial resources. While we see great benefit in such an approach, we also hope that improved efficiency and speed in the implementation of the core network may also produce favourable effects on the implementation of the overall (comprehensive) network.

Q14.- Would you like to make any further comment or proposal? (optional)

Planning and implementation of strategic links to neighbouring countries should be given more attention to ensure adequate capacity, efficiency and coherence with the planned core network.