



# Public Consultation Report

- **TEN-T Policy Review**  
**Report on the Public Consultation**

Directorate-General  
for Energy  
and Transport



**SEPTEMBER 2009**

## **Summary report**

# **Green paper on Future TEN-T Networks**

31<sup>st</sup> July 2009

The Commission adopted a Green Paper "TEN-T: A policy review – Towards a better integrated trans-European transport network at the service of the common transport policy" (COM (2009) 44 final) on 4<sup>th</sup> February 2009. Contributions were requested by 30<sup>th</sup> April 2009.

This report is intended to be a reflection of what has been received in the form of responses to questionnaires and letters. The ideas put forward in the various contributions have been summarised without any interpretation. Opinions outlined in the report do not represent the views of the Commission, although in a very few cases, clarifications by the Commission on possible misunderstandings have been put in brackets. The completeness of this summary cannot be guaranteed however, but details can be found by reference to the various contributions published on the website. It is intended solely to assist interested stakeholders to obtain an overview of the results of the consultation.

By organising an open consultation on the Green Paper TEN-T Policy review, the European Commission sought the opinion of organisations involved in the TEN-T programme on a review of the current TEN-T Policy. The public consultation elicited much interest from a broad range of organisations, public authorities and citizens from EU Member States and outside the EU. Altogether, the European Commission received around 300 contributions. The contributions respond to all or part of the 13 questions asked in the Green Paper, but several go beyond the questions and raise new issues and ideas. The Commission is very grateful for such active participation, which testifies to the great importance of further developing the Community's transport infrastructure policy for Member States, regions, infrastructure managers, transport operators, users, NGOs and so on.

### **1 Categories of respondents**

The European Commission received 300 replies to the open consultation, 248 of which were received in the form of letters, and the remaining 52 in the form of questionnaires. For the purpose of analysis, the answers have been grouped as follows:

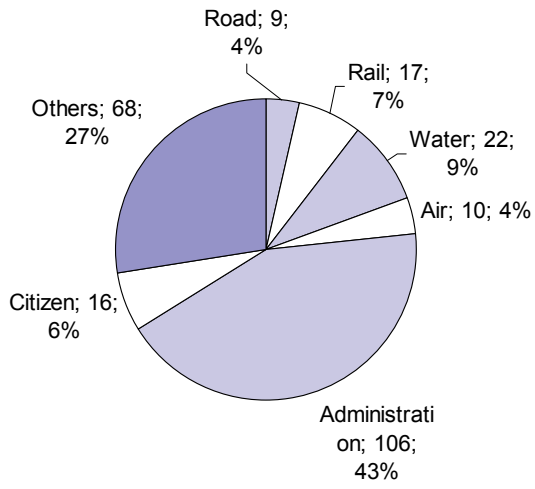
**a. By sector** (see graphic, page 3)

<i>Category</i>	<i>Replies</i>	<i>Description</i>
<b>Public administrations</b>	106	National governments, regional, local administrations and any other public authorities.
<b>Organisations related to rail transport</b>	17	Railway authorities, rail associations and rail service providers.
<b>Organisations related to road transport</b>	9	Road associations, automotive undertakings.
<b>Organisations related to waterborne transport</b>	22	Ship owners, port authorities, both inland waterways and maritime transport.
<b>Organisations related to air transport</b>	10	Airlines, airports, air transport associations.
<b>Citizens</b>	16	Individuals.
<b>Others</b>	68	Labour organisations, environmental and special-interest organisations and all other organisations.

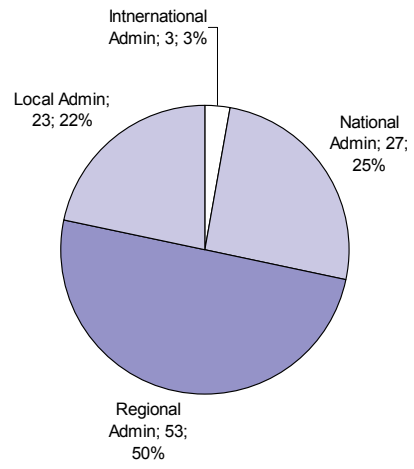
**b. By type of organisation** (see graphic, page 3)

<i>Category</i>	<i>Replies</i>	<i>Description</i>
<b>International administration</b>	3	At European level and worldwide
<b>National administration</b>	27	Member State ministries, agencies
<b>Regional administration</b>	53	Regional ministries, agencies
<b>Local administration</b>	23	Municipalities, agglomerations
<b>European Organisations and Associations</b>	38	At EU- level
<b>National Organisations and Associations</b>	27	At national level
<b>Regional Organisations and Associations</b>	31	At regional level
<b>Others</b>	48	Private companies, local special-interest organisations, organisations advocating specific corridors, international organisations

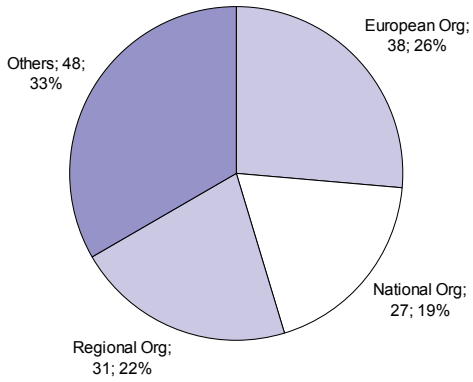
### By sector



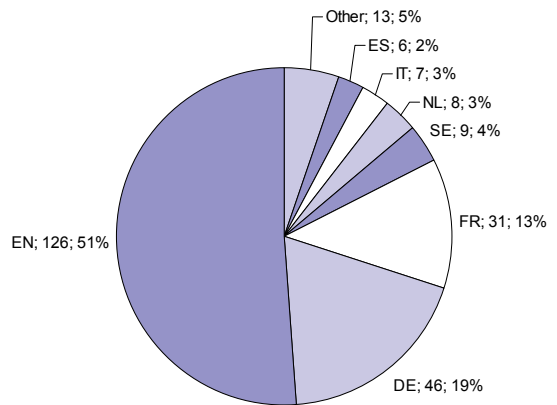
### Level of administration



### Level of association



### By language



## 2. Analysis of the responses

The questionnaire on the TEN-T policy review contained twelve questions.

### ***Question 1: Should the Commission's assessment of TEN-T development to date cover any other factors?***

A number of special-interest groups used this question to put forward their views on specific corridors and projects, which according to them, should have been mentioned in the Green Paper. One respondent suggested creating coefficients (benchmark indicators) on construction progress in order to push for completion of lagging parts of current TEN-T projects. Another called for a meaningful performance benchmarking standard and public, independently verified figures on rates of return, levels of congestion, average journey times, turnaround times in ports etc. This would bring transparency to the process of project evaluation. Priority should then be given to bottlenecks at lagging parts of the infrastructure. These are often small missing links with huge repercussions for the network. Some contributors wanted the Commission to mention specifically that, in the interests of continuity, projects and plans undertaken to date should not be abandoned.

To exert pressure upon Member States, some contributors wanted penalty mechanisms to form part of the TEN-T policy review; Member States would otherwise have no incentives to mobilise themselves at political and project management level. One respondent would welcome a report on project development. Another commented that more attention should be paid to administrative bottlenecks, mentioning the example of the EU and Russia, where delays and costs are not only caused by inadequate infrastructure but by an organisational mismatch.

A number of respondents highlighted the lack of emphasis on the external dimension of the TEN-T network. One member state proposed that the Commission take account of future accession of the Western Balkans and appoint a facilitator on this issue. Some respondents felt that the long-term integration of new Member States was not specified and that links to Eastern Europe, Asia and Mediterranean were missing. One contributor felt that the needs of ultra-peripheral regions were not sufficiently addressed in the paper.

Some respondents cited the lack of a specific definition of city growth and increased urban transport and the so-called 'last-mile'. A suggestion was made to address demographic change and the growing role of metropolitan areas in the policy review.

A number of regional and local planning authorities and stakeholders expressed an interest in participating in the planning process. More interaction between different governing levels (multi-level governance) was proposed and coordination between Member States should be stepped up. Some Member States did not agree with the Commission's opinion on discrepancies between community planning and implementation at national level. According to one respondent, the European Commission should give more attention to project initiation and support. One Member State said that the Commission's review should take on board the EC Court of Auditors recommendations, particularly regarding governance and administration of TEN-T funding.

Some contributors cited the lack of a specific mention to shift to environmentally friendly modes. In contrast, other contributors criticised the lack of a commitment not to privilege any mode of transport. Respondents from the road transport sector said that Commission policy

should not address modes of transport but efficiency of transport; demand management should be left to the users, not to planners.

Railway undertakings requested that the prioritising methodology should take more account of projected traffic flows and be more aligned with other corridors like ERTMS. One respondent also proposed to integrate the Trans-European Networks for energy, telecommunication and transport.

Transport and the Environmental Reporting Mechanism should be part of the selection procedure, according to an environment-related organisation. Some contributors felt that the selection methodology should focus more on congestion avoidance and environmental benefits. Congestion issues should prevail over the connection of remote areas, according to one local administration. Similarly, another respondent suggested looking into the efficient use of existing infrastructure instead of creating new extensions.

A number of contributions from the environmental sector and citizens asked the Commission to address traffic avoidance in the policy review. The issue of traffic avoidance remains controversial, however. Traffic avoidance is not a feasible solution according to a number of contributors from the transport industry. One citizen proposed revising the hypothesis of transport growth over the next 20 years. Scepticism about current traffic forecasts was also expressed in contributions from some environmental groups and regional administrations. One contributor criticised the lack of reference to the EC Communication in June 2009 on the future of transport

***Question 2: What further arguments are there for or against maintaining the comprehensive network, and how could the respective disadvantages of each approach be overcome?***

Most contributors took a positive attitude to maintaining the comprehensive network. The most prominent argument was access. Having a comprehensive network is also a way to ensure connectivity in remote peripheral areas, hence improving social and territorial cohesion. It helps make progress on a wide range of issues e.g. rail interoperability and road safety. One contributor pointed to synergy by having a comprehensive network in conjunction with a priority network. Another contributor suggested applying an ‘excellence’ corridor approach to the comprehensive network, i.e. using examples of best practice to improve infrastructure performance. Another contributor welcomed the creation of a monitoring database with Member States’ input. This database would help boost the commitment of Member States. One contributor suggested using the comprehensive network as a testing ground for new solutions (including ITS applications). Regarding inland waterways, one respondent said it supports maintaining the comprehensive network because every single part of the network would be important, given the low network density.

Opponents to maintaining the comprehensive network argued that the comprehensive network consists of purely national projects and should therefore be left entirely to Member States’ responsibility. TEN-T policy should instead focus exclusively on priority projects, cross-border interoperability and port connections. The lack of penalties for Member States’ failure to complete it would render the comprehensive network inefficient. One contribution suggested dispensing with the comprehensive network as long as cohesion, structural and national funding are disbursed independently, citing the principle of subsidiarity.

***Question 3: Would the priority network approach be better than the current priority projects approach? If not, why not and what are the particular strengths of the latter? If so, what (further) benefits could it bring, and how should it be developed?***

An overwhelming majority of contributors were in favour of a network approach. This approach would help concentrate scarce resources and ensures connectivity, reduces frictions in international traffic and thereby improves cohesion. The priority network should be truly multi-modal, interoperable, coherent, sustainable and have 'European value' and it should address inter-modal connections (airports, ports, intermodal terminals), urban nodes and connections to third countries. Connections between long- and short-distance traffic should also be addressed, according to a public transport organisation and respondents from the rail sector. Some respondents from the railway (manufacturing) industry were in favour of a fully interoperable network with high-speed mega-corridors and mandatory ERTMS or at least with ERTMS as a backbone.

A number of respondents insisted on a network that gives equal priority to all modes of transport. One road transport organisation suggested that the policy review address the principle of performance optimisation for each mode of transport. Some respondents suggested that concentrating funding to remove soft or cross-border bottlenecks could yield huge positive network effects. This approach would focus on more efficient use of existing infrastructure. Respondents from the construction industry also saw the need for adequate funding of major infrastructure projects in the priority network. One intermodal organisation proposed creating a new entity in charge of the priority network, which would be responsible for supervising safety, security standards, traffic flow and interoperability design.

Opponents to the priority network approach argued that a priority network would be artificial. This approach would be risky because the effects of individual investment projects on the entire European network would be difficult to measure. They said that the network approach favoured countries in the geographical centre of Europe, which could be counter to cohesion objectives. As an alternative to a priority network, it was proposed that priority projects could form a coherent network of main routes. The air traffic management (ATM) stakeholders seem to prefer a network approach to a priority project approach. If a priority project approach should continue, it should include the European ATM Master Plan.

Concerning the method used to develop a network, many respondents wanted modern project evaluation techniques to be applied to identify projects with the highest added value in terms of economic, social and environmental benefits. According to some respondents, it is very important to use tools for project appraisal and comparison and a multicriteria analysis that takes into account economic, energy, social and environmental criteria. Some contributors stated that the concept of European added value should be the method used, rather than a Cost-Benefit-Analysis (CBA). Others favoured a transparent and harmonised CBA approach, possibly including real environmental costs.

Clarifying the assessment criteria would offer more visibility to the TEN-T policy. A rigorous method of identifying and selecting priority projects, including socio-economic evaluation, was proposed by automotive manufacturers. The road sector welcomed the approach of major traffic flows as an indicator of priority. One Member State proposed basing the priority network on current corridors and basing it on either real or projected traffic flows. Furthermore, it was proposed to create three categories according to their level of completion to assess suitability for financing. One port operator wanted not only current traffic flows but also their environmental and socio-economic impact to be considered.

Organisations and companies from peripheral regions said that the core network must consider the needs of (ultra-) peripheral regions with low population density. One European association said that more reliable data was needed to devise a proper methodology. Some respondents wanted the network effect to be the main selection criterion. One contribution from the aviation sector suggested using capacity standards, whilst minimum service levels were proposed by the inland waterway sector. Concerning railways, some regional administrations wanted to focus on node capacity, not only on the capacity of routes between nodes.

Some respondents wanted the priority network approach to be based on existing priority projects. Similarly, one local administration insisted that completing the current 30 priority projects should remain a priority. A new priority network should not put the old 30 priority projects into question. Some respondents wanted business demands to be taken into account; others feared that too much focus on business needs would undermine cohesion objectives. Planning should also take into account invulnerability to natural disasters and environmental assessments should involve many stakeholders at all levels, according to an environmental organisation.

The integration of long-distance traffic and urban traffic was important to the rail and partly the air transport industry. Respondents from the inland waterway sector suggested not funding projects where parallel alternative connections exist (e.g. rail vs. water). A shift from modal priority projects to cross-modal green corridors would be needed. Some community groups against the Brenner project expressed their aversion to high-speed corridors. They argued that in countries with a high-speed rail network, the modal share would typically be dominated by road, whereas in countries without a high-speed network, there would be a high modal share of rail.

***Question 4: 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?***

The contributions received were pretty much divided as to whether or not to support the idea of a conceptual pillar. A significant number of respondents did not fully understand the concept, its principles and its added value, which should accordingly be clarified further. Arguments in favour were that the conceptual pillar would strengthen the bridge between the TEN-T review and other EU proposals. It would, for example, address co-modality, interoperability, inter-modality, ITS, environment and energy in the TEN-T framework. It would combine freight, ERTMS and Green Corridors in one single network and it would make it possible to monitor trends in demand and technology.

ATM stakeholders see the "conceptual pillar" as the basis for the link between Community Transport policy objectives as set out in the Single European Sky policy including SESAR and its infrastructure policy. Through a "conceptual pillar" the focus would shift from national level to a network concept considering the needs of all users. Some contributors asked for objectives of the conceptual pillar to be spelled out and criteria laid down in the TEN-T Guidelines. Those sceptical to the conceptual pillar argued that it could undermine the selection and funding of main routes in the priority network. One respondent proposed not including a conceptual pillar into the core network but rather into the comprehensive network, as a testing ground for new solutions.



***Question 5: How can future challenges in the sectors of waterborne and air transport (especially ports, inland waterways and airports) as well as the 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 treatments in the TEN-T policy? What further aspects relating to different transport sectors/common transport policy issues should be given attention?***

For airports the priority was seen in establishing airports as truly multimodal interconnection points, thus reinforcing inter-modality and the integration of airports in the inter-regional, but also regional and local transport networks. The TEN-T policy should allow for the development of airports in line with the Community Policy on Airport Capacity and support the implementation of Community security policy. According to respondents from the maritime and the aviation sector, it is important to improve hinterland connections of ports and airports, notably rail and waterways. According to many respondents, ports and airports should also be the connecting points to include the external dimension of the TEN-T.

The inland waterway sector and a high number of administrations are keen on promoting investment in waterways in order to improve hinterland connection of ports. Their main argument is that rivers offer huge capacity for both passenger and cargo traffic and the investment needed to benefit from this potential is low. The road sector cautions against favouring one mode of transport over others.

According to an environment-related group, the TEN-T analysis should not only focus on current traffic flows but also on future modal shifts. The Commission could do so by using environmental assessments when setting up a priority network. One respondent identified possible conflicts of interests between infrastructure optimisation under NATURA 2000 aspects and CO<sub>2</sub> emission reduction aspects. In this case, the respondent felt that CO<sub>2</sub> emission reduction considerations should prevail.

A high number of contributors, especially rail industry operators, remain divided on the issue of separate treatment of passenger and freight traffic. Although most contributors deemed a separation to be desirable, an argument against separation is that in dense networks, co-existence of both freight and passenger traffic on tracks cannot be avoided. Two contributors highlighted the fact that the policy goal should be to build infrastructure at the least cost for a maximum usage. Costs for separate infrastructure would be high and separation is therefore unrealistic. An argument in favour of separate treatment was put forward by one business undertaking which wrote that the role of the public sector would be much stronger in passenger transport, whereas in goods transport the public sector is just providing for the prerequisites of freight business, which is almost solely operated by the private sector. Hence, the two sectors should be treated separately in some cases.

Some contributors from the maritime sector stated that infrastructure should be prepared for the use of gigaliners and long trains. Another from the public transport sector suggested using extra-reserved lanes for buses on motorways. Some contributors, especially the rail industry but also some administrations, called for integration of urban transport into the TEN-T policy. Other contributors, however, explicitly dismissed focusing on urban traffic. Urban policy should respect the subsidiarity principle, according to Chambers of Commerce. According to a respondent from the rail sector, the connection between long- and short-distance traffic would be improved by the installation of more parking space at train stations. The road freight sector points to the necessity to install further rest areas on corridors. Special focus should be given on the transport of hazardous goods, notably in urban areas, according to local administrations.

***Question 6: How can ITS, 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?***

Most contributors share the Green Paper's position on infrastructure management and the role of Information Technology Systems (ITS), including Information and Communications Technology (ICT). ITS would be a good supplement to classical infrastructure investment but should not become an alternative according to some respondents. Other respondents asked the Commission to give preference to ITS and traffic management over hard infrastructure.

However, there seems to be a general consensus among respondents that ITS remain very important for improving the functioning of all transport systems and to boost the importance of energy efficiency and environmental sustainability. If ITS could be used for all modes, and if they were able to operate swiftly across modes, this would lead to cleaner, safer and more efficient transport. ITS are necessary for the efficient connection of intermodal nodes with the various transport modes in order to guarantee efficient flows without administrative constraints. ITS would help achieve high utilisation rates on corridors and reduce congestion.

A number of respondents asked the Commission to provide guidance on harmonising ITS standards. Other respondents, however, wanted to let the market decide which technology loses or wins, citing technology neutrality. According to these respondents, it would be risky for States to embrace a one-sided approach favouring a single technology. In this context, some respondents favoured a bottom-up approach to ITS deployment in TEN-T to be economically viable. A high number of contributors discussed liability, access and ownership of data. Many respondents thought that these issues should be further discussed.

One railway undertaking suggested paying more attention to the application of Open Source solutions to ERTMS (unbundling of hard- and software). In general, many contributors thought that traffic management information should be made available to users. This would then require standardised multimodal information systems for both freight and passenger transport, and possibly a new management structure. The EC would then have to address users' fear of losing control of their data. The comprehensive network should be the geographical basis for selecting ITS pilot projects, according to one contributor. Some respondents said it was important to support interaction of ITS between hard and soft infrastructure. Harmonisation of ITS across Europe and across modes of transport would be desirable to ensure interoperability. One business organisation wanted TEN-T funds to be concentrated on major ITS, such as EGNOS, GALILEO, ERTMS and SESAR.

According to respondents from the air transport sector, the TEN-T needs to take full account of the Single Sky policy, including the ATM Master Plan and SESAR. One railway company highlighted the benefits of ERTMS/ETCS (European Train Control System) level 3, which would ensure the optimum functionality of the ETCS. Works to implement the Single European Sky (SES) and SESAR were fully supported by most respondents from the aviation industry and a chamber of commerce. Some respondents from the rail sector stated that ITS in the railway sector should not be reduced to ERTMS, but should equally include research into tracing wagons and optimising traffic systems. One railway company stated that ERTMS should not be a goal in itself. The Commission should therefore not set technological feasibility as a target but economic efficiency.

ITS should be developed for connections throughout the whole mobility chain to support the effectiveness of public transport. This could include mobile phone user information systems, integrated ticketing and optimised timetable systems for interchanges. ITS should be used for communication to connect TEN-T with public transport through passenger information, disruption messages etc.

Connections of long- and short-distance traffic would support co-modality in passenger transport, according to one respondent from the public transport sector. According to an organisation from the road sector, exemplary ITS applications are eCall, Real-Time Passenger Information, Road User Charging, Fleet Tracking Systems, and other land-based ITS applications. Concerning road infrastructure, many respondents saw a high potential for ITS in facilitating road user charging schemes. This would in turn improve demand management and have positive environmental effects, especially if external costs are internalised, according to one national administration. One regional administration suggested that ITS development within the road sector should be financed by users themselves rather than publicly.

The waterborne and rail transport sector have had a positive experience of ITS in the past. According to one respondent from the inland waterway sector, implementation of RIS contributed to efficiency of waterborne transport. As far as the rail sector is concerned, ERTMS is said to have fostered interoperability and harmonisation. One respondent asked to make tracking and tracing freight systems compulsory in the EU.

***Question 7: 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?***

Some contributors suggested that shifting borderlines between infrastructure and vehicles should not be made a priority in either the short or the long-run. One Member State says that innovation should be stimulated but not duplicate the objectives of other European programmes such as Research & Development. A road association suggested developing cooperative systems between infrastructure and vehicle (V2I) and between infrastructure and users. One Chamber of Commerce suggested extending the concept of infrastructure to include vehicles and technological components associated to the infrastructure.

The road sector wanted the Commission to foster ITS development through policies to remove legal barriers (liability issues), common standards and free access to data. One respondent from the aviation sector presented its current vehicle-infrastructure project (AIM — Application platform for Integrated Mobility) in Brunswick, Germany. One railway undertaking said that ERTMS equipment consists of 70% on-board equipment and 30% track-side equipment. Therefore, they argued, ERTMS on-board equipment should be able to benefit from TEN-T and national funds. Similarly, other respondents from the rail sector said that the shift of control technology from infrastructure to the vehicles calls for more funding for vehicles. One Member State wanted to focus on the interrelation between GALILEO and ITS in all modes of transport. It believes that integrated intelligent in-vehicle safety systems should be used more.

A new idea was expressed by a regional organisation, which stated that technological innovations also foster the creation of new organisations that aim to optimise technology. Creating a network or centres to control traffic could be a useful proposal, according to one respondent from the construction industry. Some contributors did not see any fundamental

shifting borderlines at all. One respondent viewed the whole discussion as semantic and perceived a risk in mixing up the railway liberalisation concept with the concept of ‘shifting borderlines’. The first concept promoted the separation of infrastructure provision and operational use whilst the latter focused on bringing infrastructure and operational users closer.

***Question 8: Would this kind of core network be ‘feasible’ at Community level, and what would its advantages and disadvantages be? What methods should be applied at the design stage?***

In general, Option three, namely the two-layer option for the TEN-T network, was perceived as the most feasible of the three options. A remaining question is the right balance between a bottom-up and a top-down approach. One regional administration suggested letting Member States propose projects for the priority network as this would increase acceptability of the network. Other contributions strictly opposed the existing system of project proposals by Member States, citing inefficiency. Many respondents perceived the risk of an ‘Europa der zwei Geschwindigkeiten’.

Peripheral and rural areas must be taken account of. If the issue of peripheries is properly addressed, the core network would be feasible according to a high number of respondents. A transparent and comprehensive methodology for selecting corridors is equally important to one respondent. One Member State deemed the problematic part of the core network to be its conceptual pillar as it hinders the continuity of planning and implementation of traditional infrastructure projects. For some respondents, feasibility of the core network may be increased by involving stakeholders and experts in policy forums that interlink politicians, public and specialists at an early stage. According to ATM stakeholders, a feasible network policy would need to consider that infrastructure investment across all sectors of the industry is to be reflected in the TEN-T guidelines, including both ground and airborne assets and all user groups, including general/business aviation and also the military.

***Question 9: How can the financial needs of TEN-T as a whole in the short, medium and long term be established? What form of financing — public or private, Community or national — best suits what aspects of TEN-T development?***

A high number of contributors suggested meeting the financial needs of TEN-T through increased participation of users in the costs of construction and operation. Proposals suggested earmarking revenue by including transport sectors in the EU ETS, the Eurovignette, EIB loans, infrastructure charging or kerosene tax, the latter being proposed by only one contribution. The harmonisation of track access charging systems in the rail sector is deemed highly desirable by some respondents. The structuring and the multiannual contracting of track access charges would be needed to mobilise private funds.

Regarding the involvement of the private sector, responses were fairly divided. Those advocating the involvement of private investment mainly pointed to insufficient public spending behaviour. Private investment would be an ideal supplement to public funds. One Member State was very much in favour of using private investment. Sharing knowledge and expertise in designing major transport projects or setting up and running PPPs.

Private-sector involvement would be a useful method of delivering TEN-T projects. A clear scope and risk definition would be needed to attract private investment. One business organisation said that the contribution of private investment and private risk capital in terms of asset provision was not recognised in the Green Paper. Those sceptical about private involvement cited the inability of peripheral regions to attract private investment and the inexperience of several countries. Similarly, some argued that PPPs were not suitable for all projects as if they were a 'passe-partout' but needed to be assessed on a case-by-case basis.

PPPs may even raise the overall price of project, according to one respondent from the rail sector. Respondents sceptical about private-sector participation stated that private involvement within the rail sector would only be effective in a few specific projects, e.g. high-speed rail. One respondent suggested taking into account the fact that socio-economic costs and benefits often differed from a private investor's evaluation. One Baltic Member State proposed that where infrastructure is based on business needs, a high share of private involvement is possible and desirable. One local administration stated that shifting borderlines between infrastructure and vehicles increases the opportunities for PPP financing. An aviation research institute said that private-sector investment would be limited to business cases with marketability. In cases such as Galileo, where a long phase of preparation precedes market penetration, private investment would be hard to attract.

Project financing through Eurobonds remains controversial. Whereas some respondents view this possibility as incentive for strengthening the existing financial platforms, others argue that the EU would go beyond its mandate and escape parliamentary control. Issuance through Eurozone States would weaken the stability and growth pact. Such borrowing would benefit States with poor budgetary discipline.

Respondents from the rail sector suggested addressing the difference in construction life cycle between road and rail projects. Road projects would usually need 2 to 3 years, whereas rail projects would typically need 6 to 8 years for completion. Thus, rail projects would often be impeded because they did not fit into the 7-year budget period of TEN-T.

Other new ideas included:

- Establishing a European infrastructure fund/supranational body to coordinate funding;
- Devising a European scoreboard to record year by year the state of implementation of Priority Projects and the funds committed and disbursed by Member States and the EU on each project. This tool would aim to fine tune investment from EU and Member States;
- Taking into account the amounts of funds per capita that each Member State has invested over the past years for evaluating eligibility and performance of future projects (a Member State proposal);
- Distance-related charging should be avoided as this approach entails geographic discrimination, according to one business organisation.

***Question 10: What assistance can be given to Member States to help them fund and deliver projects under their responsibility? Should private-sector involvement in infrastructure delivery be further encouraged? If so, how?***

Generally, a huge number of contributors proposed increasing the rates of co-funding. One Member State asked for more flexibility regarding the total amount of support to projects. Similarly, a high number of contributors reiterated the need for combined funding from Cohesion, Structural, EIB, and TEN-T funds where possible to maximise the effect of overall Community funding. But combining cohesion, regional, EIB funds with TEN-T funds was also criticised by some respondents as this could blur the specific goals of each programme. A number of respondents were in favour of lowering the administrative burden linked to the disbursement of TEN-T funds.

One organisation suggested that Community funding should only be disbursed when a Member State faces higher costs than other Member States. One regional administration and one Member State underlined the benefits of a credit with preferential interest rates and guarantees via commercial banks. One respondent suggested that the EU create a 'sovereign European debt' from which Member States could receive loans. The EU should be more flexible towards MS with a ratio of debt: GDP over 60%. Some contributors proposed to generally improve instruments of the European Investment Bank. Others proposed to take on board only projects which are economically feasible. A railway organisation suggested creating a European scoreboard to record year by year the state of implementation of Priority Projects and the funds committed and disbursed by Member States and the EU on each project. One member state welcomed an exchange of knowledge and experience within NETLIPSE project on managing large projects.

Regarding private-sector participation, a number of contributors made constructive proposals on how to encourage private involvement. One respondent from the private sector identified the lack of guarantee mechanisms and clear rules of risk sharing under PPPs. In this context, one Member State wanted to encourage States to launch small-scale PPPs as pilot projects and to draft European standardised PPP guidelines on experience, selection, negotiation and implementation in a European standardised toolkit for PPPs.

A business organisation suggested that projects could be advised by private companies to make private financing more likely. One Member State proposed benefitting from leverage effects and mobilising private capital by launching PPP projects. More specifically, by increasing the rate of support from EU funds for PPPs, private investors could be attracted. A railway organisation deemed PPP projects to be linked to long-term visibility and guarantees given over return on investments, which necessitates use of the user-pays principle. Another respondent from the railway sector stated that the LGTT (Loan Guarantee for the Trans-European Transport Network) was very useful but should be adapted to the complexity of rail PPPs.

***Question 11: What are the strengths and weaknesses of existing Community financial instruments, and are new ones needed (including 'innovative' instruments)? How could the combined use of funds from various Community resources be streamlined to support TEN-T implementation?***

Respondents considered the fixed 7-year budget, clear project eligibility rules, higher subsidisation thresholds from Cohesion Fund and Structural Funds and the focus on prioritised transport infrastructure to be an advantage. The inability to combine financing from different funds was cited as a weakness (*Remark from the EC: This is probably based on a misunderstanding of the rules, see the TEN-T financing regulation EC/680/2007, Article*

7(2) and Article 13(2b)). In this respect, the concept of a one-stop shop for financing is cited in one contribution. As further weaknesses were cited low TEN-T subsidisation thresholds and the fact that subsidies do not increase along with cost.

A few respondents found the incentives for investment coordination between neighbouring countries to be insufficient. Furthermore, some Member States pointed to problems in securing national funding by the beneficiary of the EU grant. One local administration believed that, in addition to the costs of infrastructure provision, variable costs (cost of infrastructure operation) should also be taken account of in the Cost-Benefit-Analysis. One respondent from the rail industry believed that, while TEN-T budget prioritises the rail sector, ERDF, cohesion and Member State funds seem to prioritise road transport; they therefore perceive a lack of complementarity and coordination. A railway undertaking stated that EIB loan rates do not appear to be enough of an incentive to create leverage. One regional administration deemed the consideration of peripheral regions under the CF and ERDF to be inadequate.

Although two regional administrations saw no need for new financial mechanisms, but instead suggested extending and reviewing current EIB mechanisms and easing and supporting PPP, many respondents made proposals for new financial instruments. An intermodal organisation proposed tax relief for investment completed in advance, a bonus scheme for projects resolving bottlenecks and penalties/bonuses/peer pressure for Member States lagging behind. Another proposal was to divide funds between study research phase and real infrastructure building.

One environment-related organisation proposed a system of ex-ante certification of projects in view of their TEN-T status, which could be based on criteria such as the contribution to climate change objectives. In general, some respondents proposed creating new guarantee mechanisms. One railway undertaking proposed issuing ‘project bonds’ with EIB guarantee of payment. Another new instrument could be a national ‘sustainable transport fund’ funded by revenue from the internalisation of external costs of transport. Two citizens suggested that maximum funding thresholds should be fixed on a unit basis. This would provide an incentive to build the cheapest infrastructure. One railway organisation deemed a PPP expertise centre (EPEC) to be a useful platform for exchange on PPP issues. One organisation from the road sector proposed establishing a PPP fund, managed by PPP experts, which would give higher value for money. This fund would allocate support directly to PPP schemes.

One organisation from the maritime sector suggested that a strategic ‘corridor management body’ (or what is referred to as the ‘Governance body’ in the rail freight corridor proposal of the European Commission) would be best to manage or coordinate the allocation of funds and grants according to a cost-benefit analysis, with the Commission overseeing. One regional administration thought that the various existing funds could be combined, which would allow a more efficient allocation of support (taking account of the objectives and the sector concerned).

***Question 12: How could existing non-financial instruments be improved and what new ones might be introduced?***

A common consensus seems to be to boost the role of European Coordinators as they have proven valuable in the past. One local administration proposed assigning one coordinator to each TEN-T project. Other local administrations proposed choosing a single coordinator for two corridors when there is a crossing point. However, one Member State opposed more EC coordination; project delays would not be solved by stronger coordination. According to an intermodal association, the EC should be directly involved, especially on cross-border

projects, to make coordinators' work more effective. One Member State proposed that Coordinators extend their mandate to the comprehensive network. One environmental organisation expressed the view that coordinators could ensure that high-quality environmental impact assessments are conducted. Representatives of the railway sector recommended appointing a European manager for rail infrastructure.

Corridor coordination is largely viewed positively. However, one Member State opposed public financial support to such business-driven projects, as these projects should be able to attract private investors instead. The Open Method of Coordination was deemed useful as a governance approach by many contributors, as it helps to inform the public better on the progress of projects.

Transparency of data, sharing best practices and establishing performance data were called for. Better accessibility of TEN-T and Natura 2000 GIS data and transparency of information on traffic data forecasts would also improve environmental assessments, according to an environmental organisation. One railway undertaking proposed facilitating access to technical data describing technical and economic parameters of TEN-T corridors. Progress reports on corridors or an observatory on implementation were desirable according to a regional administration. The TEN-T-EA was proposed as a platform for best practice by the rail infrastructure industry. This would serve to increase communication on the progress made by different projects.

Regarding new non-financial instruments, the Commission's proposal for benchmarking was largely supported. Several respondents proposed mandatory deadlines for project implementation to be imposed on Member States. Technical assistance, such as the JASPERS initiative, was also proposed. This could help the Commission to rank projects by their European value-added in view of receiving Community funding. One Member State suggested that all projects of common interest should be subject to a harmonised cost-benefit analysis. They indicated certain national CBA and HEATCO guidelines as an appropriate basis for TEN-T wide application.

According to one municipality, coordination at the level of urban regions should be given more attention. One intermodal organisation proposed creating a new entity in charge of the priority network. This entity would be responsible for supervising safety, security standards, traffic flow, interoperability design etc.

***Question 13: Which option preferred?***

This question is dealt with in the following paragraph 3.



### **3. Structural options for shaping TEN-T**

An overwhelming majority of respondents expressed a preference for Option 3, hence for a dual structure of a comprehensive and a core network. In many cases, this preference was given alongside proposals for adjustment or changes. A significant number of respondents did not specify any preference or hesitated between options.

For instance, one railway undertaking proposed starting off with Option 1 and then switching to Option 3 in the long run. One air transport organisation proposed combining Options 2 and 3 to create a new fourth option. Organisations that favoured Option 1, the status quo, were two railway undertakings, one regional administration and one citizen. Option 2, a single layer approach, was favoured by one member state, a railway undertaking, a local administration, a research institute, a maritime organisation and a special interest group.

### **4. Positions within different transport modes**

Although the revised TEN-T network ought to be an integrated network, we break down the positions by transport mode to analyse the differences and common opinions.

#### **4a) Road**

The road sector was represented by major contributions from the European Road Assessment Programme, European Road Federation, International Road Federation, European Automotive Manufacturers Association, International Road Transport Union, National Union of Road Hauliers from Romania, AB Volvo, EARPA and AISCAT.

The sector called for a methodology for network planning based on socio-economic evaluation, not solely on environmental aspects. A forced modal shift away from the road should be avoided. All transport modes should have equal priority. PPPs were generally viewed in a positive light by the road sector. Few contributions stressed the need for support of innovative systems such as new propulsion systems.

Safety issues were a major concern. One contribution proposed evaluating TEN-T road infrastructure by road safety standards and establishing a ranking of roads by benefits from improvements in safety standards. Regarding ITS, it was proposed to develop cooperative systems between infrastructure and vehicles (V2I) and between infrastructure and users. One international federation proposed that ITS development should be accompanied by policies to remove legal barriers (liability issues), common standards and free access to data. In any case, ITS could not fully replace traditional infrastructure investment, as underlined by one respondent.

The creation of a European Roads Agency to manage funding for road infrastructure (safety, ITS, etc.) was suggested by one European Federation. The contribution also proposed appointing a single person to oversee all problems related to road safety, referred to as 'Mr/Mrs Road Safety'. Another major concern of the road freight sector seems to be the provision of parking space and rest areas along roads and in urban areas.

Contributions favoured Option 3 if any option was favoured. Some respondents had no preference.

## **4b) Rail**

Respondents from the rail sector included major undertakings such as PKP, DB, SNCF, NMBS/SNCB, FDS, Finnish Main Railways, Caminhos de Ferro Portugueses, SZDC and ALSTOM as well as national and European organisations such as Rail Freight Group, ASTOC, UNIFE, CER, European Rail Infrastructure Managers and the European Railway Agency.

In general, the sector was very positive about the comprehensive network apart from two undertakings. The positive attitude was partly due to the sector's past experience with the comprehensive network, as it is said the comprehensive network had fostered interoperability and harmonisation in the railway sector.

There was no general consensus in the rail industry on whether or not to promote ERTMS within the TEN-T network, with some undertakings highlighting economic aspects to be taken into account where necessary. ERTMS should be the backbone of the future core network or even mandatory, according to the rail manufacturing industry.

Connections between urban and long-distance traffic were important to the rail sector. ITS could play a major role here by means of user-information systems. All rail operators called for more funding into vehicles in addition to funding for hard infrastructure. On-board equipment should therefore be eligible for TEN-T funding (*Remark from the European Commission: this funding is already possible, see Regulation EC/680/2007, Article 6(2)(ii)*).

Some respondents were sceptical about handling passenger and freight transport separately, whilst others were positive.

Some respondents called on the Commission to take account of differences in construction life cycles between transport modes regarding TEN-T funding. At present, the relatively short-term planning for EU funding would favour the financing of road projects as these projects typically have shorter completion periods than railway projects. The Commission was also asked to take steps on the issue of harmonising infrastructure user charging. Revenues generated by internalising external costs should be used to finance TEN-T projects, possibly by creating a new 'Sustainable Transport fund'. A 'Sovereign European Debt' was proposed by a French undertaking. It considered it necessary to be more flexible in funding terms for Member States with high debt/GDP ratios. The rail sector did not express overwhelming support but remained sceptical about PPPs.

The various stakeholders in the industry remain divided regarding their preferences for one of the three planning options, although a large majority preferred Option 3. One undertaking hesitated between options 1 and 3. Another undertaking did not indicate any preference.

## **4c) Aviation**

Ten replies were received from different air transport stakeholders. The response given by the Industry Consultation Body should be highlighted (the official advisory body for the Single Sky policy, advising the Commission on behalf of all air transport stakeholder groups). In addition, contributions were received from CANSO (International Association of Air Navigation Service Providers), the Association of European Airlines, the European Regional Airlines association, the Airport Council International, Deutsches Zentrum fuer Luft- und

Raumfahrt and others, including one manufacturer, airports, a national air navigation authority and one environmental group.

The sector for air transport should be included in TEN-T policy, reflecting the importance it has for European economic prosperity and global competitiveness. Stakeholders would also like to see that reflected in adequate (=more) funding for air transport, considering the difficulty to reach the set policy and performance objectives through private financing only.

ATM and airports remain the focal points for air transport in the TEN-T. The TEN-T would need to take full account of the Single Sky policy, including the ATM Master Plan and SESAR. All aspects were already set out there, including the European network approach, the performance scheme, including efficiency and environmental objectives. ATM is seen as part of the conceptual pillar, with the ATM Master Plan and the functional air space blocks as priority projects. Public support was requested to implement the ATM Master Plan in order to respect the need for synchronisation and consideration of negative business cases to achieve network benefits. On-board equipment for ATM infrastructure and the needs of all user groups, including general/business aviation and the military should be explicitly included.

For airports, the emphasis was placed on intermodality, and on integrating urban, regional and long-distance networks at airports. Overall the TEN-T should include hubs as well as regional airports, given the importance of airports for regional development, cohesion and international cooperation and competitiveness. Regional airports are said to be especially important for the transport of perishable products produced in peripheral regions.

One respondent asked to favour rail infrastructure and to apply demand-led measures together with the internalisation of external costs and environmental assessment of projects.

There was general support for the proposed third option regarding the TEN-T concept: a comprehensive network approach together with a core network, comprising a geographic pillar (the 'physical network') and a conceptual pillar ('business approach' and ITS). This was viewed in the context of creating a successful European network through regional/local implementation.

#### **4d) Waterborne transport**

This summary report takes the waterborne transport sector as a whole because some contributions could not be clearly associated to either inland waterways or maritime transport. Waterborne transport is the best represented mode of transport in terms of number of contributions. Major contributions from ports were submitted by Marseille Port, Duisport, Bundesverband oeffentlicher Binnenhaefen, Zentralverband der deutschen Seehafenbetriebe, European Sea Ports Organisation, Federation of European Private Ports Operators, Nationale Havenraad, Union des Ports de France, Unione Interporti Riuniti, Port Authority of the Bay of Algeciras, Port of Gijon and Port of Valencia. Shippers were represented by the European Shipper's Council and the Swedish Shipper's Council. We also received contributions from European Barge Union, European Community's Shipowners Associations, CPMR North Sea Commission, North Channel Partnership, BIMCO, DG MARE/CPMR and the MIF Group Transport Shipping Services. Voies navigables de France and Inland Navigation Europe were representing the inland waterway sector, together with some ports organisations.

In general, the sector took a very positive view of further developing the concept of Motorways of the Sea within the TEN-T planning network. One association considered the comprehensive network as unsuccessful in the past and therefore not worth maintaining.

Some respondents stressed the need to pay more attention to intermodal connections for freight transport, notably rail and inland waterways to ports, when revising the comprehensive network. The priority network was seen positively, especially by the inland waterway sector. This priority network would ease the integration of inland waterways into the European transport network. Intermodal hubs were seen as an important part of this network.

Almost all contributions wanted ports (in the same way as hub airports) to be nodes of the priority network. One port operator and its affiliated national port organisation did not want the current market situation to determine a priority network but instead wanted criteria such as environmental and socio-economic impacts and the North-South equilibrium to be considered.

In order to achieve a better integration of transport and environmental policy objectives, it should be acknowledged that projects that have been granted TEN-T status fulfil 'Imperative Reasons of Overriding Public Interest' (IROPI) criteria, according to a European organisation. *(Remark from the Commission: TEN-T planning shall be done in full respect of all relevant Community legislation on the environment, including Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora).*

Most respondents, especially from the maritime sector, stressed that no preference should be given to any mode of transport but a fully co-modal priority network should be established. Congestion avoidance was identified as an important issue. One national inland ports organisation suggested considering eco-efficiency by improving existing infrastructure rather than developing new infrastructure. The use of longer and heavier vehicles/trains was suggested to address the underperformance of specific corridors. ITS deployment was viewed very positively.

The implementation of RIS (River Information Services) is said to have contributed to efficiency improvements of waterborne transport. User charging would become easier and more uniform with ITS. ITS would equally improve efficient connections between European ports and rail and inland waterways and thereby guarantee efficient flows without administrative constraints. One port authority even suggested making tracking and tracing freight systems compulsory in the EU.

PPPs were not seen as a solution to tackle funding scarcity by some contributions. Motorways of the Sea would require public financial intervention in order to be viable. However, PPPs may be used to support public investment. Financial resources could be generated by internalising external costs, according to some contributors.

Regarding preferences for the proposed options, one contribution favoured option 2, whereas most others preferred Option 3. Some contributors were either indifferent or did not indicate any preference.

## **5. Taking the process forward**

The results of the open and forward-looking contributions to the public consultation will feed into the TEN-T policy review process, both at the network planning and implementation stages. In the course of the next few years, this process may lead to legislative proposals and proposals for other Community action in this field. It will be linked to relevant transport policy action within and across the different transport sectors. One of the main legislative proposals planned as a follow-up to the Green Paper is a revision of the Community Guidelines for developing a trans-European transport network. This proposal is expected to be supplemented by legislative proposals on Community funding.

