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North Sea Commission response to Green Paper on *TEN T: A Policy Review – ‘Towards a Better Integrated Trans European Transport Network at the Service of the Common Transport Policy’*, as adopted by the Executive Committee on 27 March

About the North Sea Commission and the North Sea Region

Founded in 1989, the North Sea Commission (NSC) is one of six Geographical Commissions under the umbrella organisation CPMR (Conference of Peripheral Maritime Regions) whose purpose is to raise the profile of maritime and peripheral regions in Europe. The North Sea Commission was established with the aim of encouraging cooperation and partnerships between the regions around the North Sea, raising the profile of the North Sea region and promoting it as a major economic basin. Currently the NSC has 36 individual members from 7 countries (Denmark, France, Germany, Netherlands, Norway, Sweden, and the UK). See more information on:

<http://www.northseacommission.info/home.html>

The North Sea region is diverse in terms of geography, and is characterised by coastal areas, mountain regions, islands, sparsely populated areas and cities, while also being rich in natural resources such as oil, gas and fish.

The countries around the North Sea (Belgium, Denmark, France, Germany, the Netherlands, Norway, Sweden and the United Kingdom) constitute a potential market of over 252 Million consumers. Industry and consumer demand create huge traffic flows, of both imports and exports which are increasingly using the North Sea. Road congestion in Europe and the established benefits of short sea shipping as a sustainable part of the logistics chain creates demand for the extension of the North Sea short sea network. The North Sea is one of the busiest maritime regions in the world and central to this activity is short sea shipping. In 2006, short sea shipping in the North Sea Region totalled some 599 million tonnes. Regular liner services and ferries operate fast, reliable and flexible connections that carry a wide range of cargos in a wide range of vessels.

- The NSC welcomes the initiative to launch a consultation on a Green Paper (GP) as a basis for revising the TEN-T guidelines in 2010. We very much agree with the stated needs and reasons for the review, bringing the TEN-T more in line with recent development & trends, as well as for strengthening the role of TEN-T in promoting sustainable growth, accessibility and combating Climate Change (CC).
- The NSC agrees with the main profile of the GP, applying a comprehensive, integrated, coherent and forward-looking perspective with greater emphasis on added European value, sustainable development, stronger market & demand-orientation, more flexibility and focus on the interaction between infrastructure and transport services. We also welcome the focus on Intelligent transport systems (ITS) and new technologies as a bridge between “hard”

infrastructure and the vehicles, with a potential for optimising capacity of the transport system and paving the way for more environmental and safer transport solutions. We furthermore believe that the future TEN-T guidelines should take full advantage of the opportunities offered by ITS tools in improving security from theft, damage and loss of cargo.

- The NSC believes that the future TEN-T policy should give clearer priority to investments in the most sustainable transport modes, such as rail, Short Sea Shipping (SSS) and inland waterway, also including investments in ports and terminals facilitating shift towards such sustainable modes, as well as in their respective hinterland connections. Support for routes which connect ports to the hinterland and more distant regions and markets is important both in terms of accessibility to coastal areas and for the competitiveness of ports. This will in turn facilitate more and better trans-European movement of people and goods. As for road investments, priority should be given to investment in safety equipment and facilities for use of more sustainable fuels (e.g. filling stations for bio-fuel, electricity and hydrogen).
- The NSC agrees with the proposal to define quality and performance standards for the network in terms of capacity, safety, intermodality, interoperability and sustainability. The network is only as strong as the weakest part of a multimodal transport chain. These weaknesses usually appear as “bottlenecks”. Concentration of effort in identifying and removing these bottlenecks may be one way to quickly raise the overall standard and capacity of the wider Community transport network.
- The NSC welcomes the recognition within the Green Paper that the needs of both passengers and freight must be taken into account in reviewing the TEN-T programme. While it is true that there are different needs for passenger and freight transport the TEN-T programme should possibly concentrate on the areas where synergies can be derived. Furthermore, there is a tendency to assume that freight is homogenous. This is not the case and the NSC would urge the European Commission to take into account the different needs of container and bulk freight movements as it develops its proposals for the future of the TEN-T network.
- The NSC underlines the importance of completing the existing 30 priority projects and that new routes are not introduced in the meantime. The priority routes display substantial recognised benefits for the EU and the disadvantages inherent in not completing these projects are significant. The Motorways of the Sea “project” is regarded to be of a more universal & permanent character, and should therefore be integrated in a future priority network (or whatever option is selected on the basis of the current consultation).
- The NSC believes it is important that TEN-T takes into account all forms of alternative fuels and technology developments, including those, f.ex bio-fuels, natural gas and electricity, which will be able to come on stream much more quickly (than f.ex hydrogen) and will therefore contribute to the EU’s environmental and climate change objectives over a shorter timeframe. The realisation of the full benefits from sustainable fuels cannot be



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achieved without significant investment in the support infrastructure across rail, road and maritime modes

- It is important that the TEN-T guidelines are based upon a consistent, fair and transparent framework which can then be used to determine whether projects are eligible for funding in order to ensure a level playing field for all infrastructure users.
- The NSC supports proposals for widening the financial tool box for TEN-T, also exploiting PPP solutions and user charging. The latter should however only be applied in areas with sufficient traffic potential. As for Community financial instruments, one should consider developing a mechanism that would assess a TEN-T project, and then internally decide what level of funding would be made available from which instrument, based on the contribution the project would make to the aims of each initiative. The creation of such a mechanism would then allow Community funds to be directed to the most appropriate projects in a more streamlined manner
- It is vital that the future TEN-T guidelines are consistent with core Community policies as expressed in the Gothenburg and Lisbon agendas, including the policies on Energy & Climate Change, Integrated maritime policy and Territorial Cohesion.

Particular areas of concern:

Cohesion

Transport policy has got a significant territorial impact and could, if designed properly, contribute positively to territorial cohesion. The NSC believes it is of utmost importance that cohesion concerns (e.g. long distances from markets & service centres, permanent geographical handicaps and small goods- and passenger potential) are taken duly into account in the upcoming revision of the TEN-T guidelines. We are therefore pleased to observe that “cohesion benefits” are included as a criterion in the Cost/Benefit-analysis to precede the selection of projects of common interest (p.14). It is however important that the “cohesion criteria” gains sufficient weight in the over all equation in line with the “traffic volume criteria”.

This means that priority projects / core networks (whatever option is chosen on the basis of the consultation on the TEN-T Green Paper) should also comprise connections to and within peripheral and maritime regions.

For the TEN-T policy to promote territorial cohesion it is vital that secondary transport networks and hubs are strengthened in order to improve accessibility to peripheral areas, as well as for alleviating congestion on the most congested parts of the transport network.

A relaxation of the State Aid guidelines to allow for wider use of PSO's in upholding transport services to peripheral areas, also across borders, would also promote territorial cohesion and should be considered in the context of the broader perspective on infrastructure policy introduced in this Green Paper.



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Regional Airports are of vital importance for the accessibility of peripheral regions, and the slot allocation rules at international hub airports should ensure that existing services to peripheral regional airports can be retained and developed, and new routes encouraged to operate.

Maritime dimension

The North Sea is one of the busiest maritime regions in the world and central to this activity is short sea shipping. In 2006, short sea shipping in the North Sea Region totalled some 599 million tonnes.

The NSC agrees to the statement on the Motorways of the Sea (MoS) concept on p.6 that “The complexity of procedures for obtaining public financial support and the lack of clear objectives and criteria have however hindered any broad implementation of the concept so far”. It is a fact that potential users perceive MoS under TEN-T to be difficult to use. On this background we expect the European Commission to take actions to ameliorate the situation, and make the MoS instrument more user-friendly. We would also encourage the Commission to benefit from the findings of relevant projects under the Interreg IVB North Sea Region Programme, such as StratMoS and Dry Port in this respect – projects specifically designed to facilitate the use of MoS by the industry. We would also recommend that the Commission works even closer with the various stakeholders in maritime transport undertaking a fundamental review of the MoS concept so that short-sea shipping is supported and not constrained.

The Commission must however be careful that any measures it introduces in support of MoS services do not provide an unfair advantage to some ports over others (avoid distortion of competition)

Concerning MoS, the NSC believes that the Commission should as far as possible try to harmonise criteria, schedules and procedures for the TEN-T and the Marco Polo II programme – offering a more harmonised interface in relation to potential users and exploiting synergies of funding. Such an approach would also fit the ambition of the Green Paper to address the dynamic interaction between the infrastructure and service perspective, as well as strengthening market orientation.

The NSC also believes that stronger emphasis should be put on the cohesion objective for MoS in the TEN-T guidelines, with a view of drafting more concrete criteria for MoS projects in peripheral areas with weaker traffic flows and longer distances, including wider opening for participation of small and medium-sized ports (under the current guidelines, participation in MoS projects is restricted to Category A ports).

External dimension

With Norway as a member country, neighbouring Russia, the NSC would like the future TEN-T guidelines to put stronger emphasis on the external dimension – fully reflecting the 2007 Communication from the Commission on “Guidelines for transport in Europe and neighbouring



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regions”. Of the five transnational axes identified in this Communication, the NSC is particularly concerned with extending the Motorways of the Sea network along the Norwegian coast all the way to the Barents Region and North-West Russia, and with the Northern axis connecting the northern EU with Norway to the north. The foreseen connection to the Barents region linking Norway through Sweden and Finland with Russia is also regarded as important.

The NSC believes that such important links to neighbouring countries should be integrated in a future core network to ensure that the network corresponds well with “functional” transport corridors” going beyond EU borders. It is thus important that the infrastructure for international transport and the legislation governing the use of these routes by different transport modes are designed in a harmonised manner – streamlining customs procedures and reducing administrative obstacles.

Governance - The role of the regions

The NSC underlines the importance of consulting closely with the regions through the Green Paper as, although TEN-T projects are submitted by national governments, implementation will inevitably involve regional and local organisations.

Conclusion

Concerning the possible options for further TEN-T development listed in item 4, Question 13, the NSC has a certain preference for option 3 – Dual layer structure with the comprehensive network and a core network, comprising a geographically defined priority network and a conceptual pillar helping to integrate the various transport policy and transport infrastructure aspects.

We believe that option 3 has the greatest potential for developing a coherent and flexible TEN-T network with high European added value, facilitating sustainable development and territorial cohesion.

The inclusion of a “conceptual pillar” should provide the programme with the flexibility to adjust to market conditions, and network pressures as they develop in the longer term. This “pillar” also provides a convenient layer for the application of “Open Method of Coordination (OMC) which appears to have been generally regarded as beneficial in other sectors. At the same time, we believe it’s important to ensure that this pillar is clearly defined with unambiguous objectives to ensure fair implementation across the EU.

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