



**CPMR
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***Ms Violeta BULC
European Commissioner for Transport
European Commission
DG Mobility and Transport
200, rue de la Loi
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Rennes, 16 January 2018

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Dear Mrs Bulc,

I should like to take the opportunity at the start of this new year to convey to you my best wishes, both on behalf of the 160 Maritime Regions of the CPMR and from me personally.

This year is crucial for the future of EU Transport Policy, as the Commission will be unveiling its legislative and financial framework proposals, particularly through the CEF Regulation for the post-2020 period.

We will be presenting ourselves a set of proposals on the overall MFF next March, but I would already like to share with you our Regions' priorities on transport ahead of the European Commission's internal debates that will precede the publication of legislative proposals. We are also hoping for an update of the 2011 Transport White Paper to take account of the industry's evolving challenges and to bring this document in line with how this policy area wants to be reoriented.

The CPMR supports the Commission's initiatives to reduce the transport sector's impact on climate

The transport sector continues to experience increasing GHG emissions. This is unacceptable and incompatible with both the Paris Summit commitments and the 2011 White Paper guidelines.

Maritime regions are the first to be affected by global warming. We therefore support the Commission's action with international shipping (IMO) and aviation (ICAO) bodies to come up with global binding rules. We also support the implementation of the polluter pays principle for road transport. The revision of the Eurovignette Directive is a step in the right direction, provided that the arrangements for implementing it do not penalise the peripheries and are adapted to regional circumstances.

The CPMR also supports the level of priority given by the Commission to innovation, digitisation and multimodality, as these help transport and logistics to be more efficient and consequently reduce emissions.

These priorities will need to be reflected in the future CEF regulation.

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But EU transport policy must also make improving accessibility one of its priorities

As stated in the 2011 White Paper, “restricting mobility is not an option”. The CPMR defends the **right to mobility** of persons and goods, regardless of their geographical location. This basic right, set out in Article 4 of the TEN-T Regulation, must be reflected in the CEF.

The CPMR regrets therefore that since 2014, the CEF has been implemented to the detriment of peripheral and island regions located away from the priority corridors. These regions are disadvantaged by centralised and competition-based implementation through calls for projects. Only those regions situated along the corridor routes take part in advisory forums, and the regional authorities have no real means of intervention except through their national authorities, which contravenes the principle of **subsidiarity**.

The review of the CEF regulation must help to **rebalance support geographically** and **improve governance**.

CEF and TEN-T core network reviews must go hand in hand

Although the regulation only plans for this to happen from 2023, the EU cannot do without a **TEN-T review in the short term**. The criteria set out in the current regulation are leading to the definition of a core (priority) network that actually reduces possibilities for mobility for the peripheries and the islands. **Criteria** need to be reviewed and made more **flexible**. This will result in core network **maps** that take account of regional priorities.

Starting in 2018, the CPMR's geographical commissions, structured around Europe's sea basins, will be working on reviewing these maps.

This also means anticipating the consequences of **Brexit** on transport flows, which risk marginalising territories such as Ireland. If the TEN-T in 2020 remains the same as in 2017, its credibility as a key instrument for programming European transport networks will be undermined.

Besides the Motorways of the Sea, an EU short sea shipping policy fostering modal shift is still to be defined

Modal shift to short-sea and medium-distance shipping needs to be encouraged, since it helps to reduce emissions. Surprisingly, the 2011 White Paper does not encourage shipping as an alternative to road transport for distances under 350 km. It therefore will need to be updated on this point.

The European Commission regards Motorways of the Sea as “the maritime dimension of the TEN-T” as defined in Article 21 of the Regulation. The CPMR has long called for this Article 21 to be updated to make it more **accessible to comprehensive network ports**, and so to the **peripheries and islands**. It reiterates its demand, **whether this involves changing the implementation** by means of a delegated act adopted by the Commission **or improving this article** as part of the TEN-T Regulation review.

Nevertheless, the EU must go further than just Motorways of the Sea to encourage the modal shift of goods from road to sea. This also means **supporting the launch of maritime services** that offer a sustainable alternative to road transport for short and middle distances between two Member States, including for bypassing conurbations or mountain ranges. The TEN-T and CEF regulations must henceforth allow these financial incentives, in compliance with European competition rules. The CPMR once again invites the Commission to speed up - and shape - its reflection on this type of **new tool based on supporting transport demand** (instead of the offer as was allowed by Marco Polo).

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If the renewed CEF regulation respects these principles of territorial and modal balance, climate action and good governance, the CPMR considers that the CEF budget must be at least maintained at its current level in the post-2020 budget perspectives.

You will find in annex to this letter a **summary presentation of the changes** that we propose to make to the current Regulation in order to give concrete form to these principles.

We would be happy to discuss any of these topics with you at your convenience.

Yours sincerely,



Vasco CORDEIRO
President of the CPMR
President, Government of the Azores

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Desired changes to the CEF Regulation

1 – CEF contribution to climate action

1.1 – Revise upward the indicative percentage of the CEF budget granted to the decarbonisation target, currently set at 5% (Annex 1, Part IV, b)

1.2 - Enhanced support for the development of maritime transport

1.2.1 - Harbour work

Given that ports are by nature cross-border facilities, increase the ceiling for subsidies for harbour works to 40% (instead of 20%). The rate shall vary between 20% and 40% depending on their level of accessibility set on the basis of the **new annex to the regulation defining the accessibility criterion**. (See point 23)

Ports belonging to the global network shall all benefit from the 40% rate, as shall ports in the remote, outermost, island and peripheral regions.

1.2.2 - Better targeted support for Motorways of the Sea (MoS)

The current regulation provides for a single rate of 30% for actions to support MoS. The CPMR proposes a rate of between 30% and 50% depending on the level of accessibility of the ports involved in the projects (see new annex on accessibility). Remote, ultraperipheral, island and peripheral regions shall all benefit from the 50% rate.

123 - New instrument for maritime transport services

New provisions within the regulation, to be defined together with professionals, should be designed to **support the launch of maritime services** offering a sustainable alternative to road transport for short and middle distances. This new tool would be based on providing **support for transport demand**, in compliance with European competition rules.

2 – CEF contribution to improving accessibility

2.1 - Introduce accessibility as the fourth sectoral objective in the revised regulation (*Article 4.2 of the current regulation*)

This objective would be aimed at improving accessibility and connectivity for all EU regions, especially remote, outermost, island and peripheral regions.

It would be given an indicative percentage of the revised CEF budget.

2.2 - Secure the share of the budget dedicated to the TEN-T global network

The revised CEF regulation should dedicate a **minimum % (floor rate)** of its budget to completing the TEN-T global network, **instead of a ceiling rate** (currently set at 5%).

2.3 - Introduce a cross-cutting accessibility criterion

An annex to the revised Regulation would set criteria, scales and a modulation of the CEF co-financing rates depending on regional circumstances. Earmarking would be introduced to ensure a level of support for the least accessible categories of territories. (*In line with the planned earmarking for the global network*)

2.4 - Review the routes of priority corridors

The corridor routes (Annex 1 of the CEF Regulation) shall be reviewed to create a better balance in the coverage of EU territory. The CPMR made [detailed proposals](#) on this point in June 2017.

3 - Improve governance in the implementation of the CEF

Without undermining the current efficiency with which the CEF is managed, governance will be improved in its implementation to better address territorial challenges.

3.1 - Delete the Commission's statement included in the foreword to the current Regulation which entitles only Member States to put forward projects for funding

3.2 - Introduce an article specifying the participation of regional authorities in the committee procedure for selecting projects, and in various implementation measures that interfere with their prerogatives

3.3 - Coordinate support measures from different EU instruments to fund infrastructures

Some types of transport infrastructure projects are currently eligible under several European funds, mainly the CEF, Cohesion Fund and ERDF (including Interreg). If this situation persists after 2020, the new regulations for the post-2020 funds must ensure the same co-financing rates for the same type of project across all the funds.

Completion of the TEN-T (core network in 2030 and global network in 2050) must be a goal shared by all relevant Directorates-General of the European Commission, in particular DG Move and DG Regio. This involves DG Regio participating in the planning of priority corridors and their connections with the global network and with infrastructures at regional / local level.