CPMR RESPONSE TO THE CONSULTATION ON THE MID-TERM REVIEW OF THE 2011 WHITE PAPER ON TRANSPORT

A. RESPONDENT DETAILS

1. Are you answering as an individual or on behalf an organisation / Institution?
☐ I am answering as an individual
☒ I am answering on behalf an organisation / Institution

2. Please specify your main field of activity:
☐ Individual citizen
☐ National public authority
☐ Central public authority
☐ Local public authority
☐ Private company
☐ Consultancy
☐ International organisation
☐ Workers organisation/association/trade union
☐ Industry association
☐ Other interest group organisations association
☐ Research organisation/ University
☒ Other (please specify)

2.1. Please specify “Other”
International organisation that brings together 160 European maritime regions, representing all of Europe’s sea basins, the islands and the outermost regions

3. If you work for a company, please give an indication of its size:
☐ Micro company (less than 10 employees, up to €2 million turnover, or balance sheet up to €2 million)
☐ Small company (less than 50 employees, up to €10 million turnover, or balance sheet up to €10 million)
☐ Medium size company (up to 249 employees, up to €50 million turnover, or balance sheet total up to €43 million)
☐ Large corporation (250 employees or more, more than €50 million turnover, or balance sheet total of more than €43 million)

4. Please indicate whether the organisation /company you represent deals primarily with transport issues:
☐ Yes  ☒ No

5. Main transport area(s):
☐ Road transport
☐ Rail transport
☒ Maritime transport
☐ Inland waterways transport
☐ Air transport
☐ Urban transport
☐ Transport logistics services
☐ Manufacturing of transport equipment
☒ Multimodal /all transport modes
☐ Other (please specify)

6. Transport segment represented:
Between 1 and 2 choices
☒ Passenger transport
☒ Freight transport

7. Please provide your country of residence / establishment:
If answering as an individual, please provide your place of residence.
If answering on behalf of an organisation/Institution, please provide the place of establishment of the organisation/Institution

FRANCE

8. Can you please identify which organisation or association you represent?
The Conference of Peripheral Maritime Regions of Europe

9. Please indicate if your organisation is registered in the Transparency Register of the European Commission
☒ Yes
☐ No

9.1. Please enter your registration number in the Transparency Register
(Numbers only)
554642368807

10. First Name
PATRICK

11. Last Name
ANVROIN

12. Address
CRPM
13. City
35000 Rennes

14. Email
Patrick.anvroin@crpm.org

15. May the Commission contact you, in case further details on the submitted information in this questionnaire are required?
☒ Yes
☐ No

16. Contribution received from this survey may be published on the European Commission’s website, with the identity of the contributor. Do you agree to your contribution being published under your name?
☒ My contribution may be published under the name indicated
☐ My contribution may be published but should be kept anonymous
☐ I do not wish any of my contribution to be published
B. ANALYSIS OF THE SITUATION

1. The aim of this section is to obtain stakeholders' views on the most important challenges affecting the transport sector in the EU. How do you rate the importance of the challenges for the transport sector in the EU in the upcoming years?

<table>
<thead>
<tr>
<th>Challenge</th>
<th>Not at all important</th>
<th>Slightly important</th>
<th>Fairly important</th>
<th>Very important</th>
<th>No opinion</th>
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<tbody>
<tr>
<td>Oil dependency</td>
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<td>Air and water pollution</td>
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<td>Administrative and regulatory burden</td>
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<tr>
<td>Infrastructure development</td>
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<tr>
<td>Financing of infrastructure</td>
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<tr>
<td>Safety</td>
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<tr>
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<tr>
<td>Passenger rights</td>
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<tr>
<td>Working conditions</td>
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<tr>
<td>Social responsibility</td>
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<td>Internalisation of external costs</td>
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<tr>
<td>Affordability of transport services</td>
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<td>Accessibility to transport services</td>
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<tr>
<td>Competition from third countries</td>
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<tr>
<td>Increasing competitiveness</td>
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<tr>
<td>Urban mobility</td>
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<td>☐</td>
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<tr>
<td>Management and control of increasing traffic</td>
<td>☐</td>
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<td>☐</td>
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<tr>
<td>Cross-border transport services</td>
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<tr>
<td>Innovation</td>
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<td>☐</td>
<td>☐</td>
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<tr>
<td>Technological change</td>
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<tr>
<td>Multimodal transport</td>
<td>☐</td>
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<td>☐</td>
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</tbody>
</table>
2. Please elaborate on your answers to the above statements and indicate any other challenges that should be taken into account.

THE QUESTION OF ACCESSIBILITY IS OF PRIME IMPORTANCE FOR THE PERIPHERAL AND MARITIME REGIONS. This should be a priority of EU transport policy. But neither the 2011 White Paper nor the recent decisions on the TEN-T and the CEF give accessibility the important place it should have given the principle of territorial cohesion and of various provisions in the Treaty. Even when the texts (TEN-T, CEF) adopted in 2013 under the co-decision procedure stipulate that the needs of the peripheries must be considered, the calls for project proposals that implement these texts often omit to take account of these stipulations. It is around this observation that CPMR’s current campaign on accessibility has been developed (The CPMR’s position on this question, adopted in February 2015).

WHAT IS STRIKING IN THE CURRENT INSTRUMENTS IS THE INSUFFICIENT CONSIDERATION GIVEN TO THE ISLANDS AND THE OUTERMOST REGIONS. They must benefit from a high level of priority during the strategy review.

THE OTHER PRIORITY CRITERION FOR CPMR IS SUSTAINABILITY: maritime safety and the necessary support for sustainable maritime transport in order to reduce greenhouse gas emissions. The 2011 White Paper did away with the encouragement for modal shift, discouraged the use of maritime transport for journeys of less than 300 km; and the Marco Polo programme was then abandoned.

EU legislation has, moreover, introduced additional constraints on maritime transport with the Sulphur Directive. As all the studies show, this is already leading to a modal shift in the opposite direction: freight is increasingly transported by road, to the detriment of the peripheral ports and is worsening congestion in the central regions.

Over and above the regulations, EU funding for infrastructure and services needs to be reviewed: the CEF and the interventions of regional policy are not sufficient to deal with the challenges of equipping and ‘greening’ the sector, and the Juncker Plan will in reality favour the most profitable projects to the detriment of the peripheral projects where a high volume of flows is not possible. The question of infrastructure charging therefore needs to be examined at EU level as a matter of urgency. New sources of funding need to be imagined to encourage sustainable modes of transport and help the least accessible territories. The EU is falling behind significantly on this point.

CPMR has responded to two recent consultations by DG Move on these questions: see its contributions, attached (Marco Polo, April 2014, maritime transport, April 2015).
C. ASSESSMENT OF THE APPROACH TAKEN
The White Paper presents a long-term vision for transport with specific targets that are to be reached through various initiatives. Although, the impacts of the White Paper initiatives have in most of the cases not been visible so far, we would like to know your general impression on the approach taken. The objective of this section is also to verify if the strategy is well-balanced and properly addresses the challenges for transport sector and if it brings value added to transport policies in the EU.

1. What is your assessment of the following aspects of the White Paper?

<table>
<thead>
<tr>
<th>Aspect</th>
<th>Very low</th>
<th>Low</th>
<th>High</th>
<th>Very high</th>
<th>No opinion</th>
</tr>
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<tbody>
<tr>
<td>Progress achieved so far</td>
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<tr>
<td>Relevance of the priorities set</td>
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<td>☐</td>
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<tr>
<td>Level of ambition</td>
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<td>☒</td>
<td>☐</td>
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<tr>
<td>Clarity of the strategy</td>
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<tr>
<td>Coherence of the strategy</td>
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<tr>
<td>Cooperation with MS</td>
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<tr>
<td>Involvement of stakeholders</td>
<td>☐</td>
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<tr>
<td>Communication of the strategy</td>
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<tr>
<td>Costs of implementation</td>
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</tbody>
</table>

2. Please elaborate on your answers to the above statements.

Among the four areas of action in the White Paper, the CPRM as an organisation has been particularly mobilised on the TEN-T initiative and on funding. The answers below therefore refer to these aspects.

IN Volvement of Stakeholders is satisfactory (as seen by the participation of the Regions in the Corridor Forums), but the Regions have been given little room for manoeuvre in negotiating: decisions are for the most part taken by DG Move and national government ministries, and the system of calls for project proposals under the CEF allows a Member State to block a regional project.

The Strategy is very clear, but is in part wrong, in CPMR’s opinion. For the territories that are left on one side, the rationale behind the strategy – massification and concentration on the nine priority corridors – can be seen as a lack of ambition.

The Strategy therefore lacks territorial coherence as well as a medium-term vision. It does not envisage giving lagging-behind Regions the tools that would enable them to benefit from the future developments in logistics: congestion of maritime areas, which will necessarily require a redeployment of traffic; opportunities such as the Panama Canal expansion or the Transatlantic Trade and Investment Partnership; presence of the outermost regions in the sea basins close to other continents (Caribbean, Indian Ocean, Macaronesia, etc.); development of mining and forestry in Northern Sweden, etc.

Lastly, the ‘neighbourhood’ dimension of the strategy is insufficient; the EU needs an efficient network, but not one which stops at its borders, whether Eastern, Northern or Southern.

3. Do you think that the most urgent challenges are adequately addressed in the White Paper? Is the list of priorities in the White Paper well-balanced?

The challenges mentioned are pertinent, but some important challenges have been overlooked. CPMR had highlighted these omissions from the White Paper as early as September 2011 (see the document).
4. Do you see any contradictions/incoherencies in the objectives or in the implementation of the White Paper?
Reducing greenhouse gas emissions and limiting congestion are two of the three objectives in the White Paper. But unless we promote a better territorial balance, congestion will not be reduced, and unless we promote sustainable maritime transport, greenhouse gas emissions will not be reduced.

The priority given to the central Regions under the implementation of the CEF is therefore contrary to two of the three objectives.

5. Are the impacts resulting from the current implementation of the White Paper fairly distributed? Are there any regions, stakeholders, modes of transport that are affected differently than others?
From the point of view of the maritime regional authorities, the impacts of the White Paper are not very visible. They therefore expect a change of course towards a more balanced implementation of the CEF, to be reflected in the future calls for project proposals: taking into account of the areas that are remote from the nine priority corridors, the grey areas between the corridors and the comprehensive network.

They want to see stronger support mechanisms for maritime transport services, including through innovative measures such as the Ecobonus and appropriate application of the polluter-payer principle.

Maritime transport sector players are partners of the Regions: port authorities, ship owners. They also want to see these changes.

6. Are the White Paper initiatives and other European policies compatible with each other? Are the Member States policies compatible with the White Paper?
CPMR does not have an overall response concerning the compatibility between EU initiatives and the policies of Member States, and will be interested to see the results of this consultation on this point.

CPMR HAS ADOPTED A POSITION ON THE RISKS REPRESENTED BY THE JUNCKER PLAN, in particular in the event that part of the CEF funds is allocated to the European Fund for Strategic Investments: see attached statement. Private sector funding will obviously not be invested as a priority in projects where a lack of high-volume flows cannot guarantee profitability in the short term. Peripherality will clearly not be an asset in terms of the choices made for the allocation of EFSI funding.

GREENING OF MARITIME TRANSPORT
CPMR welcomes the EU’s determination to make maritime transport more sustainable with regard to human health and ecosystems. However it fails to understand why the financial consequences of the additional costs incurred by maritime transport operators have not been taken into account or anticipated by the European Commission. The Sulphur Directive (monitored by DG Environment) was adopted in 2012 and gave rise to an IMO decision in 2008. The consequence of this has been a modal shift in favour of the more polluting road transport. It is not a matter of calling this Directive into question, but of regretting that the European Commission has waited for six years before thinking about global financial provisions to help the sector deal with the financial challenges (adapting vessels, equipping them to operate on LNG, etc.). CPMR represents the Regions on the European Sustainable Shipping Forum set up in 2014 by DG Move to debate the impact of the Directive and more broadly the greening of maritime transport. This Forum – at the request of CPMR and of France – will in 2015 produce a guide to the different sources of EU funding available to help the sector tackle the ‘Sulphur challenge’. It is difficult to understand why there has been such a delay.

TEN-T AND NEIGHBOURHOOD POLICY
CPMR welcomes the cooperation established between DG Move and DG Near, which resulted in an agreement, signed on 21 April 2015, on the extension of the TEN-T core network to the Western Balkans. This ‘good practice’ was made possible also thanks to the political will of the two Commissioners concerned, and could usefully be reproduced in the context of the EU’s other neighbourhood areas.

7. Overall, do you think that the White Paper on transport has made a difference? What are the main achievements of the White Paper strategy?
Overall, the White Paper has not helped to improve the situation of the peripheral Regions. Moreover this was not one of its objectives.
D. EXPECTED IMPACTS AND IMPLEMENTATION
The White Paper set a long-term vision for the EU transport system and a 10 year programme which should help achieving the transport policy objectives. Given the wide areas of intervention we would like to know your opinion, if the proposed mix of measures and the approach taken are appropriate. We would also like to verify if the goals set are a good benchmark for the transport policy or they need to be revised. In addition, this section should provide us with your opinion on potential obstacles and catalysts for the implementation of the White paper strategy.

1. How do you assess the impact of the White Paper initiatives proposed, adopted and implemented so far by the Commission in the following areas?

<table>
<thead>
<tr>
<th>Initiative</th>
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<th>Low</th>
<th>High</th>
<th>Very high</th>
<th>No opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>A single European transport market</td>
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<tr>
<td>Promotion of quality jobs and working conditions</td>
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<td>Secure transport</td>
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<tr>
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<tr>
<td>Research and innovation in transport</td>
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<tr>
<td>Promotion of more sustainable behaviour</td>
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<td>Integrated urban mobility</td>
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<td>Funding framework for transport infrastructure</td>
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<td>Smart pricing and taxation</td>
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<tr>
<td>External dimension</td>
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</table>

2. Please elaborate on your answers to the above statements.
CPMR does not have sufficient evidence to respond in detail to this question, but will be interested in particular to see the responses of sector stakeholders.

3. Are the White Paper initiatives coordinated well enough to deliver the expected results? Please explain.
On the implementation of the TEN-T, there is a need for coordination between the actions of the CEF, the ERDF and the Cohesion Fund regarding the implementation of the Action Plans for the nine corridors, but also regarding the implementation of the whole network: core and comprehensive.
CPMR will be attentive, especially during the next meetings of the Corridor Forums, to see that the coordination and the necessary collaboration between the DGs concerned are effective and efficient, and that the Regions are indeed involved in the programming.

4. Are the ten goals useful benchmarks for the EU transport policy? Please explain.
Goal 3 (‘shift 30% of road freight above 300 km to rail and waterborne by 2030’) needs to be reviewed, because it implies that waterborne is not adapted for journeys of less than 300 km. This is not true, since Short Sea
Shipping offers an alternative to road transport in many situations and for short distances: bypassing of congested urban areas, etc.
This is also a very negative ‘political’ signal which runs counter to the objective of sustainability.

BASICALLY, THERE IS ONE GOAL MISSING: THAT OF IMPROVING ACCESSIBILITY. CPMR, with the support of ESPON, is ready and willing to work with the European Commission on translating this 11th goal into concrete and budgeted terms.
A 12th goal could be to adapt EU Transport Policy to external challenges: near and far neighbouring areas, developments in global logistics.

5. Do the current goals for transport respond to the strategy's overall objective of more sustainable and competitive transport?

See response for C6

6. How do you assess the importance of the aspects listed below as potential obstacles to the implementation of the White Paper strategy?

<table>
<thead>
<tr>
<th>Approach taken (objectives, division of competences, areas of intervention, timing,...)</th>
<th>Very low</th>
<th>Low</th>
<th>High</th>
<th>Very high</th>
<th>No opinion</th>
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</thead>
<tbody>
<tr>
<td>Tools chosen (design of initiatives, legal form, scope,...)</td>
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<tr>
<td>Different policies at MS level</td>
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<td>✔️</td>
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<tr>
<td>Lack of support from the stakeholders</td>
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<td>Conflicting priorities</td>
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<td>✔️</td>
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<tr>
<td>Insufficient financial means</td>
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<td>✔️</td>
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<tr>
<td>Insufficient consideration of local specificities</td>
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<td></td>
<td>✔️</td>
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<tr>
<td>Social costs</td>
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<td>✔️</td>
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<tr>
<td>Economic costs</td>
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<td></td>
<td></td>
<td>✔️</td>
</tr>
</tbody>
</table>

7. Please elaborate on your answers to the above statements and indicate any other potential obstacles to the implementation.

From CPMR’s point of view, the two main key obstacles are insufficient consideration of local specificities and insufficient financial means.
The EU clearly needs to give greater consideration to the issue of conflicts between the priorities (health and environment versus competitiveness).

8. What factors have stimulated the implementation of the White Paper strategy? Have the proposed approach and tools been optimal?

E. WAY FORWARD

Considering the review of the 2011 White Paper, we would like to receive your feedback on the focus of the strategy for its further implementation and improve its effectiveness and efficiency.
1. **What would best be done at the EU level to ensure that the strategy delivers results? What would best be done at the Member States level?**

At EU level: the strategy needs to be fundamentally reviewed, as indicated in the previous responses.

To ensure effective and efficient results, the strategy needs to be based on strong collaboration between the DGs concerned, in support of DG Move. The example of the positive cooperation between DG Move and DG Near is an illustration of this potential for synergy.

The strategy needs to take account of the growing importance of the macro-regional strategies, in which the ‘transport’ dimension is crucial. It should take greater account of the global context.

2. **How could Member States be better encouraged to follow and implement the common transport policy set in the White Paper?**

With regard to infrastructure, practices vary from one Member State to another concerning the involvement of regional authorities in decision-making and implementation. It is clearly important to publicise best partnership practices (and DG Move can contribute to this).

A very concrete provision should for example be adopted in the next CEF calls: Member States should not be allowed to block a project submitted by a Region.

3. **What adjustments within the strategy would you suggest to improve its efficiency and effectiveness?**

See D4

4. **How could the strategy be better linked with other EU policies?**

See E1

### F. OTHER QUESTIONS

1. **Are there any other issues you would like to highlight in relation to the White Paper?**

   **THE MOTORWAYS OF THE SEA** (introduced by the European Commission in its 2001 White Paper) have not been explicitly mentioned in the above comments. They are a priority for the maritime Regions, and CPMR is looking forward to jointly organising with the European Coordinator, Brian Simpson, a conference on adapting the MoS to the different territorial situations, on 25 September 2015 in the Balearic Islands.

   The way in which the European Commission (in agreement with the Parliament) will format the future Motorways of the Sea will provide indications on the possible adaptation of the White Paper strategy to the needs of the territories and the sector.

   **A COORDINATOR FOR THE “OTHER PARTS” OF THE TEN-T:** The CPMR believes that the areas located far from the TEN-T core network and the 9 CEF corridors should benefit from the action of a specific European coordinator. It is therefore asking the European Commission to appoint an additional coordinator whose action will be useful in the short term to ensure a balanced implementation of the TEN-T and in the medium turn to help prepare the TEN-T review.

2. **Please give reference to any studies or documents that you think are of relevance for this consultation, with links for online download where possible.**

   CPMR is a decentralised organisation with a number of Geographical Commissions. The North Sea Commission and the Intermediterranean Commission have also responded to this consultation (attached).