



ANSWER TO EU CONSULTATION ON TEN-T

BACKGROUND

Considering the importance of Regulation (EU) No 1315/2013 on Union guidelines for the development of the TEN-T, the Conference of Peripheral Maritime Regions deemed crucial to contribute to the public consultation launched by the European Commission in April 2019 as part of its review of the implementation of Regulation's implementation.

This contribution from the CPMR looks into the following points:

- The importance of the Regulation itself;
- The objectives of the Regulation;
- Its governance and implementation;
- Its Planning Methodology;
- Motorways of the Seas.

GENERAL APPROACH

- 1. The TEN-T Regulation is dear to the heart of Regions.** It is of utmost importance that we have a transport infrastructure policy at the EU Level in order to enable sustainable development and promote competitiveness and territorial cohesion in the EU and beyond. Additionally, it is key that this policy has a transversal dimension and functions in close relation with Energy and Climate related EU Policies.

OBJECTIVES OF THE REGULATION

- 2. THE CPRM shares the objectives of the Regulation as stated in its Article 4 of the current Regulation.** These objectives (cohesion, sustainability, efficiency and increasing the benefits for the users) should remain.
- 3. Territorial Accessibility must remain a key priority of the Regulation.** It is mentioned both as an objective of the TEN-T (Article 4.1.a(i)) and a general priority in the development of the comprehensive network (Article 10.1.a). This principle also governs the spirit of important derogation related to Motorways of the Sea and Ports (Article 20) that contributes to enhance the connectivity of peripheral regions. The Regulation should be more ambitious. Territorial accessibility should be **an objective of the Core Network too.**

4. **A measurable objective on territorial accessibility could be added to the Regulation.** It would consist for instance in aiming that no location of the comprehensive network should be further away that a certain travelling time to the nearest point of the Core Network.
5. **Contributing to EU efforts against Climate Change should be explicitly integrated into the objective of sustainability.** The regulation could have higher objectives in terms of sustainability in order to eventually enable a full decarbonisation of transport while paying due attention to the objective of strengthening territorial accessibility.
6. **Reducing congestion and pollution in European nodes should be an objective of the Regulation.** It could also encourage modal shift towards sustainable transport modes strengthening the efforts to protect marine environment and aim for a more balanced traffic between centres and peripheries. The Regulation should aim at giving people/goods the ability to travel/transport by improving the efficiency of any transportation and reducing the time taken and costs required.
7. **While it is crucial that the Regulation has high objectives in terms of sustainable development and clean mobility, it should be more flexible** in order on one hand to better respond to future changes of flows of goods and persons, technologies, environment, and on the other hand to avoid a one-size-fits-all approach in terms of transport modes and energy sources in order to better adapt to specific situations (eg. Railways ill-adapted to full electrification).
8. Considering the objective of completing the Core Network in 2030, and the importance of ensuring continuous and sustainable mobility in the EU, **the Regulation should put a greater focus on the completion of missing cross-border links.**
9. **Special attention should be paid to new EU borders in the Regulation.** Although it is still unclear what Brexit will look like and how it would impact transport connections – in particular in the North Sea and Atlantic Regions (e.g. the need to re-configure the North Sea – Mediterranean Corridor and the Atlantic Corridors), the Regulation should meet the potential challenges it will generate on connectivity, especially for Ireland while ensuring that vital existing links between UK's coastal counties and the EU are maintained. The impact of UK withdrawal on Regions that are not bordering the UK should be monitored.
10. **The Regulation should also encourage the efforts towards EU external border.** It should aim at ensuring a maximum continuity of the network between the EU and its neighbouring countries. Additionally, a greater attention should be payed to EU maritime borders in the Regulation.

GOVERNANCE AND IMPLEMENTATION

11. It seems more and more unrealistic that the Core Network and its corridors will be fully implemented by 1 January 2030. Corridors suffer delays in their implementations and several bottlenecks remain. **The Regulation should ensure a more efficient implementation of the corridors.** Different options could be considered, such as strengthening the role of the Corridors' forums and of the Coordinators for instance.

12. Member States involved should also take steps to further streamline administrative procedures, such as procurement and permitting procedures in cross border infrastructure projects. There is furthermore a need, where it is possible and relevant, to raise awareness and increase the capacity of authorities and transport stakeholders to apply innovative financial instruments, e.g. blending schemes, for funding of transport infrastructure
13. In order to ensure a better coordination between the Core Network Corridors and the Comprehensive Network, **Regions that are only on the comprehensive network should be invited to participate in the forum of the nearest corridor(s).**

PLANNING METHODOLOGY

14. The CPMR underlines that the criterion to establish the relevance of a port (or an airport) cannot be limited to its passenger or transshipment statistics. The CPMR underlines that its strategic and territorial importance must be taken into account. In the comprehensive network, **articles 20.2.c, 20.2.d for ports and 24.2.a for airports ensure that territorial importance of transport infrastructures must be maintained** in order to ensure that the comprehensive network reaches its objectives in terms of territorial cohesion. Additionally, the CPMR invites the European Commission to consider also **better taking into account the strategic territorial importance of ports for the Core Network complementing the current quantitative approach by a more qualitative approach to transport infrastructures.** Indeed, the criterion B3(P) of the Planning Methodology is rather vague. It refers to “façades or coastlines relevant at European scale” but limits the definition of relevance to a single example.

New measurable criterions could for instance be based on the following elements (this list is not exhaustive):

- For ports with fisheries as main activity, the volume of fish landed;
- Distance to a border (internal or external);
- Population in the urban area of the port by looking into smaller scale than the 88 nodes, that would however represent an important urban area;
- Share of modal shift from/to rail in the port’s activities;
- Role of the port in Regional economic development (share of export of Regional productions for instance);
- Contribution to the development of marine renewable energies, including offshore wind;
- Role of port in terms of maritime safety;
- Role of port in terms of defence and dual use between civilian and military to echo the new CEF priority on military mobility.

15. In the planning methodology, the European Commission uses NUTS1 Regions scale for exemption from statistical transshipment data for ports to be part of the Core Network. **The CRPM suggests that this exemption is brought down to NUTS2 Regions to better cope with the objective of territorial cohesion and accessibility. In a NUTS2 Region without ports in the Core Network, it would mean that the most important port of the comprehensive network**

in terms of transshipment volumes would be upgraded to the core.

MOTORWAYS OF THE SEA

- 16. Motorways of the Sea (MoS) should have a political goal in the regulation.** Article 21 of the Regulation that describes MoS is limited to a list of eligibility criterion that is not sufficient to provide a strong objective that should go further than “*achieving a European maritime space without barriers*” considering the role MoS can play to contribute, for instance, to enhance territorial accessibility in peripheral maritime regions, reinforce the connections between islands and the continent, develop sustainable maritime transport while protecting the marine environment.
- 17. In order to strengthen the visibility and political support to Motorways of the Sea, the CPMR invites the European Commission to include MoS to the TEN-T maps.** It would put MoS on the mental maps of every stakeholders working on TEN-T. Apart from depicting MoS links on the maps, it is also important to make the eligibility criteria more favourable to ports on the comprehensive network and to increase to co-financing rates for MoS projects.



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The Conference of Peripheral Maritime Regions (CPMR) brings together some 160 Regions from 25 States from the European Union and beyond.

Representing about 200 million people, the CPMR campaigns in favour of a more balanced development of the European territory.

It operates both as a think tank and as a lobby group for Regions. It focuses mainly on social, economic and territorial cohesion, maritime policies and accessibility.

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