



NGO Platform on the TEN-T Review (2008-2010)

We the undersigned civil organizations would like to appeal for a broadening of the scope of the review of the Trans European Transport Network (TEN-T). We are concerned that the current proposal for the CONNECT project, developed by DG TREN, aims to merely limit the review to traffic forecasts scenarios and an update of the priority projects list.

TEN-T is the most investment-intensive programme for infrastructure development in the EU. The TENs policy promotes a development model based on continuous traffic growth and the assumption that traffic growth stimulates economic growth. Fourteen years into the policy, the geographical scope is no longer restricted to the EU and our immediate neighbours, but is also laying the policy groundwork for cross-continental links. Before setting our sights on a new and even more ambitious infrastructure program we call on the European Commission, European Parliament and the Council to make a comprehensive assessment of the TEN-T progress to date. We call for a thorough analysis of the planning and implementation of TEN-T infrastructure projects since 1994 in comparison with original policy objectives, demand forecasts and cost-benefit analyses. Current TEN-T plans must be analysed in the light of recent EU commitments to limit climate change and the renewed EU Sustainable Development Strategy.

We therefore consider that the scope of the TEN-T review should cover the following areas, that we consider to be missing from the Terms of Reference for the CONNECT study:

1) **Ex-post evaluation of the completed TEN-T priority projects:** including, for example, the Oresund Bridge, Milan Malpensa airport, Channel Tunnel, and Via Ignatia in Greece. We recommend an assessment comparing projected against actual figures for

- total costs;
- planning and construction time;
- environmental and social impacts;
- traffic flows
- economic and regional development impacts.

The EC should establish harmonized standards for improved ex-ante cost-benefit analyses in order to avoid overspending on transport projects in the future (see for example HEATCO project).

2) **Analysis of the TEN-T projects' impact on climate change:** considering the EU's 2007 commitment to reduce greenhouse gas (GHG) emissions by 20-30 per cent by 2020. We consider the often-quoted GHG figures of completion of the TEN-T from the TEN-STAC study (2003) to be unrealistic, and call for reassessment of the climate impacts of the whole network under an agreed methodology.

3) **Strategic environmental assessment of TEN-T and corridors:** The SEA for TEN-T and corridors has not been performed in many countries, although since 2004 it is also explicit requirement of TEN-T guidelines. A substantial number of TEN-T projects, such



as the Vienna-Brno Motorway and Via Baltica have proven that serious conflicts with the environment could be avoided and more economically sustainable solution found if proper, independent assessments are carried out in advance. SEA could not only help to reduce the cost of the TEN-T projects and select better alternatives, but also reduce the time required for project preparation and negotiation, as issues are resolved at the outset of the project.

NGOs also request that the process of carrying out an SEA for the whole TEN-T be relaunched urgently. We also ask the Commission to evaluate the SEAs that have been carried out in Member states and provide a set of best practice

4) Assessment of the environmental impacts of TEN-T on sensitive environmental areas: Environmental NGOs, led by Birdlife International, have carried out a study of the potential impacts of TEN-T projects on Natura2000 sites using GIS data from the European Commission. The study highlights potential clashes between the two EU-funded networks and the need for an early warning system (good practice examples are outlined in the study) to avoid endangering European biodiversity. The CONNECT study should take the conclusions into account and build on them to avoid endangering not only Natura 2000 sites but also Emerald Network sites and in general valuable environmental sensitive areas in the Neighbouring countries.

5) Assessment of the impact of maritime transport on marine biodiversity. Since the last review of the TEN-T priority projects, the concept of the motorways of the sea has been heavily promoted as alternative to in-land transport as a way to decongest road and rail traffic. We are concerned whether the actual proceedings in the field of Motorways of the Sea would constitute an efficient and environmentally responsible alternative. The shift from land to sea transport will exponentially increase environmental pressure on marine biodiversity in terms of underwater noise, water pollution, ships collisions with cetaceans, and port construction/operation, among other things. Sea transport has a very high potential to improve its environmental performance and we call on the Commission to make the development of the Motorways of the Sea conditional on the use of best available technology and practice. We urge the European Commission to develop ambitious environmental criteria for the allocation of TEN-T funds to Sea ports, such as shore power installations, differentiated port dues, incentives for use of non-heavy fuel oil bunker fuels at sea. NGOs also request that an SEA of the MoS as a whole will be carried out.

6) Assessment of the environmental legislation and public participation in the neighboring countries. Promoting the TEN-T projects beyond the borders of the Union is a great responsibility for the EC. The recent development of the several projects in the neighbouring countries such as Vc Motorway in Croatia and Western High Speed Diameter in Sant Petrburg, Russia, mentioned also as priority projects in the HLG report, demonstrate that project development and implementation does not correspond with EU standards and often violate International agreements. Therefore we could see extension of the TEN-T network as positive development only if it guaranteed that together with physical infrastructure are build also good environmental and democratic practices



7) **Assessment of transport-efficient scenarios:** We consider that the TEN-T review process should also question some fundamental assumptions about future growth of transport demand and the relationship with economic growth. A new report has concluded that resource efficiency is the key to sustaining future economic growth. The need for more efficient use of resources is as true for transport as for energy. The CONNECT study should include a transport-efficient scenario, which takes market based instruments for the transport sector as well as rising fuel prices into account (road/congestion charging, ETS, crossing permits/exchanges, user charges for infrastructure) – What will be our infrastructure needs assuming that the policy instruments currently under discussion come into force? The CONNECT Study should also emphasise the impact assessment of competing infrastructure developments in different transport modes, such as Baltic Motorways of the Sea vs. Fehmarn Belt Fixed Link, Rail/Via Baltica vs. Motorways of the Sea, Rail Baltica vs. Via Baltica.

Conclusion

We urge the Commission to redirect the scope of the review of the TEN-T projects to meet the above mentioned criteria especially the impact on climate change. In its latest TERM report the European Environment Agency states that the EU would have long met its Kyoto targets if it weren't for the transport sector, whose emissions grew by 26% since 1990 while all other sectors have substantially cut down their CO₂-Emissions. The transport sector must contribute to achieving the EU climate goals. The TEN-T review could be an excellent starting point to assess the contribution of the TEN-T.

Sincerely yours,

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