

TEN-T Guidelines Regulation

NGO priority recommendations for dialogues

February 2013

Environmental NGOs emphasise that, with very long lifetimes for transport infrastructure, today's decisions on EU transport spending will set the path for transport beyond 2050 and into the next century. Decisions taken now, in the context of EU spending plans to 2020, will either lock Europe into further emissions and carbon-intensive development, or set us on a more sustainable course.

In light of the MFF negotiations, EU policy-makers must make plans to deal with a major funding gap and maximise value for money. Regrettably, each Institution has added to the project wishlist. There will not be enough funding for all the projects in the CEF annex or TEN-T maps to get off the ground. As a result tough choices lie ahead. These can only be resolved by first defining the selection criteria according to objectives.

The first question must no longer be *'Where to draw lines on the map?'* but rather *'Where to draw the line between projects which offer real EU added value, and those that don't make the cut?'*¹

This briefing focuses on how to make the most of the limited funds available, and to avoid the major cost-overruns and delays that have plagued TEN-T policy to date. A clear framework is needed with workable criteria to assess and prioritise projects, including all costs, benefits and risks, especially those for the environment and climate.

How to draw the line: Set the right priorities in the TEN-T Guidelines

OBJECTIVES (Article 4, also Article 2, Article 7): Ensure consistent support for the EP approach including efficiency, sustainability and user benefits as objectives and require funding proposals to be screened against *all* of these objectives.

We would prefer replacing cohesion as the 4th objective as proposed by the EP with innovation (as per Article 39), to ensure applicability across the EU. More significant transport funds for cohesion objectives are already available via regional funds (CF and ERDF).

Sustainability in particular must include the quantified reduction of greenhouse gas emissions, support for clean transport and environmental protection. Sustainability, including GHG emissions reduction, is included as one of the key objectives of TEN-T policy in the Commission proposal (Article 4), but we are concerned that there will be a delivery gap unless this is explicitly required in the Guidelines. Support "consistent and co-ordinated environmental protection" (EP AM55 (Article 4(b)iii))

RESOURCE EFFICIENT NETWORKS (Article 5): Support mandatory socio-economic cost benefit analysis, strategic environmental assessment including climate impacts.

The concerns of the Council should be resolved by clarifying that the responsibility lies with national governments to ensure these considerations are explicitly included from the earliest stage of planning.

1 A [2013 study](#) for the European Parliament (Fraunhofer-Institut, KIT, ProgTrans) is highly critical of an "inverted" planning process for TEN-T, which first selects political priority projects and draws lines on a map – but neglects to examine whether the projects are necessary or viable, either financially, environmentally or in terms of public acceptability until a late stage.

Support requirement for corridor development plans to include “measures to be taken in order to mitigate negative environmental impacts” (EP AM159, Article 5.1(e)) to give due consideration to all impacts.

We note largely positive experience so far with EU technical assistance to help project preparation. We recommend expanding this to help further with the relevant assessments (SEA, EIA including climate impacts, cost-benefit analysis) at national and regional level. This will improve cost-effectiveness, quality of planning and project delivery.

MANDATORY SOCIAL COST BENEFIT ANALYSIS AND CLIMATE IMPACT ASSESSMENT (Article 3.1 (ra) and (rc) & Article 54(b)(new): Support EP amendments 52, 54, 168.

The Commission proposal to amend Directive 2012/628 on Environmental Impact Assessment does NOT adequately address these vital questions for major transport infrastructures; it will not deliver quantified climate impact assessments within EIA, which are necessary for accurate cost-benefit analysis. As the recent EP study (Fraunhofer et al, 2013) emphasises, independent traffic forecasts are vital for an accurate economic feasibility assessment, as well as the impact analysis.

Quantitative assessment of lifecycle greenhouse gas emissions for major transport projects must be required (EP AM 54).² This is the only means to check delivery against the decarbonisation targets of the Transport White Paper (2011) and Roadmap for a Low Carbon Economy (2011). Support EP AM168 requiring the Commission to develop and adopt methodologies for SCBA, CIA and EU added value by delegated act by 2014, whilst minimising administrative burden.

PRIORITIES FOR THE COMPREHENSIVE NETWORK (Article 10): Support the EP’s emphasis on greenhouse gas reduction and energy efficiency, as well as low- and zero-carbon energy sources and mitigating harmful effects.

DEFINITION OF EU ADDED VALUE (Article 3.1(e)): Support the EP definition including “significant and measureable improvement [...] as regards sustainability, efficiency, competitiveness and cohesion”. To bring into line with the Objectives in Article 4.

INNOVATION FOCUS (Article 39): Incentivise new technologies and innovation, with priority for decarbonisation. The non-exclusive list should include (renewable) electricity supply, improved transport management systems (EP AM 139) and reduction of all external costs (EP AM 141).

Finding the right balance between waterways protection and development

NO NET LOSS APPROACH to biodiversity (Article 17 & 18): Support the EP approach which offers better safeguards to sensitive sites and habitats, particularly free-flowing waterway sections.

Good governance and transparency

EARLY CONSULTATION AND AVAILABILITY OF INFORMATION (Article 54(a)(new) – EP AM 164 & 167): Support clear EP recommendations on transparency of information and timely public consultation.

Public consultation from an early stage of planning is vital to engage public support and identify solutions, as well as avoiding costly legal challenges and delays as has hampered TEN-T projects across the EU to date. It is appropriate for the Commission to present guidelines and a best practice manual to facilitate and expedite the process for national authorities.

² E.g. see the carbon footprinting tools developed and used by the [European Investment Bank](#) and [Asian Development Bank](#) for ex-ante appraisal of investments in major transport projects, which set a clear precedent.