

EFIP's response to the Commission Staff Working Document SEC(2011)101 final on the planning and implementation of the new TEN-T policy

On 19 January the European Commission issued a new Commission Staff Working Paper setting out a concrete proposal for the planning methodology and implementation of the new TEN-T policy. This document can be considered as the “guide book” for drawing up the future TEN-T maps.

Since inland ports are essential nodes in the co-modal inland transport network, it is clear that the European inland ports are to play an important role in the upcoming TEN-T policy. EFIP has been following the upcoming review of the TEN-T policy actively and has contributed to the 2009 and 2010 consultations. Based on its response given to the 2009 and 2010 consultations of the European Commission regarding the future of the TEN-T, it has examined this new “methodology paper” of the European Commission.

In general

The European Federation of Inland Ports welcomes the review of the TEN-T policy and gives it full support to the rationale of this review, namely:

- modernise the network and boost its genuine integration into the internal market,
- take into account the new EU territory by better linking East and West
- the need to decarbonise transport
- put more emphasis on nodes (inland and seaports, urban nodes).

The European Federation of Inland Ports welcomes the attention that is given to inland ports in the definition of the comprehensive and core network as foreseen in the Annex II.

The European inland ports consider this as a recognition by the European Commission of the crucial role inland ports are playing and are prepared to play as high quality nodes:

- in the integration of transport modes
- in facilitating co-modal operations
- by enhancing the links between national networks, in particular in cross-border sections of the TEN-T network, that are often “transport no-mans-land”
- through their hinterland hub function to and from the big seaports

- as sustainable transport node (access and exit gate, logistic hub) between the long distance transport and the urban last mile.

More specific remarks

- EFIP urges each Member State to submit to the European Commission all the inland ports and inland waterways meeting the thresholds for inclusion into the comprehensive network.

In the long run, such an inclusion into the TEN-T network can only benefit the ports, the waterways and consequently the Member States. The policy put forward by the European Commission in support of better identifying the “nodes” in the network needs the support from the Member States.

- EFIP acknowledges the fact that the Commission is basing its threshold criterium for admitting inland ports into the comprehensive network (500.000 tonnes) on the inland waterway transport volumes. The European inland ports consider the 500 000 tonnes as a fair threshold but encourage the Commission to consider as well the multimodal performance of inland ports. The railway transshipment volumes should also be taken into consideration, above all for inland ports on waterways with potential/ in development which cannot meet the thresholds on the waterside, with the current state of the infrastructure. In these cases there should be some room for flexibility. The Romanian ports on the inland waterway sector of the Danube illustrate this problem. Even if they have an important seasonal traffic, their average waterborne traffic volumes often do not meet the criteria at this moment.
- Some further clarification of the category “multimodal platforms” seems to be desirable. The relation between “multimodal platforms” and “inland ports” remains unclear at this moment.
- EFIP hopes the Commission will confirm its intention to consider not only individual ports but also clusters of ports for inclusion in both the comprehensive and the core network. Increasingly, inland ports are working together to enhance their role as hinterland hub towards the big seaports. In some cases, inland ports are developing a cross-border cooperation. This cross border cooperation is not only creating interesting synergies between inland ports, but can put the finger on and contribute in solving the remaining interoperability problems which can exist in cross border sections of the TEN-T network. Next to this cross-border function, any functional co-activity or common effect on the network should be considered as criteria for identifying these inland port clusters.
- EFIP fully supports the inclusion of inland ports which are laying in a primary node, EU capital or MEGA’s. Some further clarification of the concept of “MEGA’s” seems however necessary.
- Urban nodes should play an important role in the core network. It should however be clear that these urban nodes can only play a “core” role in the TEN-T network if they have the infrastructure and/ or the potential for accommodating network links, interconnecting transport

nodes and enhancing multimodality and if they play their role in connecting long distance transport with regional and local transport.

- EFIP backs the idea to include inland ports at the crossing of two core links as secondary nodes in the core network.
- For EFIP it is essential that a review scenario is developed, which gives inland ports with a growth perspective/potential the possibility to be integrated in both the comprehensive and the core network in the future. The proposed methodology is working with volume thresholds and taking stock of the current situation. To encourage the development of an efficient, multimodal and sustainable TEN-T network, the definition of the comprehensive and the core network should include a “dynamic” element. Inland ports that are developing as multimodal transport nodes and building up their throughputs steadily should be given the perspective to adhere to the TEN-T network (comprehensive and core network) once they meet the criteria.
- EFIP pleads for a complete network approach when developing and improving the core inland waterway corridors. Attention has to be given to the integration of these inland waterway corridors into the overall TEN-T network and to the fluid link and interconnection with existing infrastructure and primary nodes in the network.
- Finally, EFIP stresses the importance of aligning the Cohesion fund allocation with the TEN-T priorities, avoiding as such that the Cohesion fund in the field of transport would feed other transport projects and priorities than the ones proposed and supported by this TEN-T review.