

ASECAP ANSWER ON THE CONSULTATION OF THE REVIEW OF THE TEN-T GUIDELINE

ASECAP welcomes the revised text of the TEN-T regulation establishing sustainable transport framework which tackles climate and environmental emergency. These two issues put transport at the heart of the European agenda. The COVID-19 crisis and the present conflict between Ukraine and Russia add another perspective, stressing once again the importance of road transport to allow the movement of people, emergency services and goods.

ASECAP members would like to congratulate the Commission for having added in the revised text the following main points:

- TEN-T regulation must allow the transport network to be more resilient, efficient and effective in terms of climate objectives, connectivity, digitalization (implementing Green Deal and Climate change objectives to reduce the greenhouse gas emissions by 90% in the transport by 2050).
- Integrating the need to contribute significantly to reduce CO₂ also in cities, which means to develop new mobility solutions in urban and metropolitan area with zero emission

ASECAP members fully share these objectives. They are strongly committed to reach carbon free objectives for a sustainable road infrastructure. ASECAP would like to take the opportunity of the consultation to provide some recommendations which could be taken into account in the TEN-T revised regulation.

Considering the high priority to safeguard the environment

ASECAP members would like to underline their strong commitment to environmental protection and that motorway concessionaires are already taking numerous actions to minimize the environmental impacts of a motorway throughout its lifecycle, like:

- noise protection for the most exposed local residents;
- protection of water resources;
- stimulate recycling for Infrastructure pavement repairs and worksites employing eco-materials and recycling;
- energy restraint and generation of renewable energy;
- make the infrastructure resilient.

Protecting biodiversity and flora

ASECAP members commitment to biodiversity starts at the motorway design stage for recent motorway, when comprehensive studies of existing biotopes and species are made:

- implementation of a plan to preserve or relocate habitats;
- improvement of old motorway sections to restore ecological continuity thanks to eco-bridges, eco-pipelines and facilities for animals;
- protection fauna species;
- use of sustainable materials, which allow controlling water and noise pollution.

Reducing carbon footprint of road infrastructure in urban and inter urban network

To face those challenges, toll road infrastructure operators are willing to invest to decarbonize road transport to reach the target of carbon-free emission by 2050 by:

- investing on road infrastructure to reduce externalities (congestion, emission savings and removing “barrier effect” of surface street by moving upper car traffic underground on urban tunnels);
- constructing by-passes to avoid long trip drivers to cross the city;
- developing solutions for a better use of the infrastructure with managed lanes to access the cities, dedicated lanes for mass public transport, carpooling, multimodal hubs, easy links with inter urban motorway... where there are important needs and no satisfying proposals, especially in important metropolitan area with large cities;
- introduction of infrastructure for alternative fuels (electricity, hydrogen, methane; AFIR regulation);

Stimulating actions to improve the carbon footprint of transport sector and other road users:

- optimizing the entire transport system to improve urban and inter-urban mobility,
- developing robust alternative fuel network both for car and public transport (electrical fast charging stations, H₂ -infrastructure for buses and coaches) in order to make the shift to deploy faster carbon free vehicle (including autonomous vehicle);
- supporting multimodal approaches and answer issues of mobility by unfolding new services
- investing in the multi-lane free flow electronic tolling collection system, which has a significant influence on reduction of annual fuel consumption and consequential reduction of emissions of CO₂, NO_x and PM,
- upgrading tolling systems to stimulate use of vehicles with less emissions of CO₂.

Sustainable construction, operation and asset management

The maintenance of the infrastructure during all its cycling life is of paramount importance, as reminded in the TEN-T regulation. Nevertheless, there is no specific reference to the tools allowing sustainable maintenance of road infrastructure. The following aspects should be considered or reinforced and integrated in taxonomy criteria:

- assessment and development of potentials to improve the CO₂ footprint of road-infrastructure over the entire life cycle;
- establishment of concepts and measures to ensure sustainable supply chains in the construction and operation of road infrastructure

Taking into account growth of huge metropolitan areas

ASECAP members are convinced that the development of a sustainable Trans-European Transport Network (TEN-T) should considerer the mobility chain and the associated services in their entirety, linking territories and answering to urban mobility needs. Urban nodes are a key element in ensuring the effective completeness of TEN-T. The emergencies mentioned above make it necessary to better develop multimodal mobility solutions as mentionned in the revised text of TEN-T regulation. The development of low-carbon urban public transport represents a major ecological challenge for solving the problems of pollution and congestion concentrated in urban nodes. Their interconnectivity is therefore essential and must be more strongly encouraged. Connections between long-distance international transport infrastructure with local, regional and national transport within urban nodes are essential to increase efficiency of the TEN-T network and to help eliminate bottlenecks. The text does not emphasizes it in right way, but rather tends to oppose once again railway versus road transport, while they should be seen as complementary. ASECAP and its members see themselves as mobility partners, connecting regions and people in Europe and abroad.

Road safety remains one of top priorities : Saving life and reducing serious accidents provides high social return.

ASECAP would like to recall that road safety, both for drivers and staff working to maintain the infrastructure, remains a priority of the toll road operators. Key recommendations would be to continue coordinated efforts made by policymakers and industry to manage the increase of traffic flows and to succeed improvement of safety and reduction of congestion on TEN-T road network. Even though the motorway network remains the safest road infrastructure, ASECAP's members are convinced that the TEN-T regulation should lead to :

- further reduce the number of road fatalities and injuries throughout the EU, towards "vision zero", contributing to the achievement of the European Commission's policy orientations on road safety;
- safeguard a realistic view by all stakeholders involved in addressing the challenges relating to the design, construction and labelling of a pan-European network of secure truck parking (based on the general safety and security situation of the country) and rest areas, which will necessitate practical management to increase driver and cargo security;
- develop reliable and smooth traffic as essential characteristics of the full exploitation of current and future gains in road transport's resource efficiency. This requires efficient traffic management, underpinned by smart pricing and a pragmatic organization of interoperability;
- digitalize the infrastructure to operate their networks as efficiently and intelligently as possible translating relevant data into structured information and targeted actions;
- support the development and deployment of Intelligent Transport Systems and in particular cooperative systems that connect infrastructure to infrastructure (I2I) and infrastructure to vehicle (I2V);
- confirm their readiness to contribute to ambitious but always realistic deployment scenarios, namely for C-ITS focusing on already approved technologies and complying with the principles of "interoperability" and "backward compatibility".. This requires dynamic cooperation and coordination between road infrastructure operators, public authorities, vehicle manufacturers and road users, i.e. between all the essential links of the value chain that produces efficient, safe, smart and sustainable transport – as a service of a given quality, at a certain price.

Concluding consideration

ASECAP believes that the TEN-T regulation should define sustainable funding mechanisms to implement those measures and reach the desired goals additional.

- important investments are still needed to offer a safe, reliable, multimodal and sustainable transportation system, especially in periurban and urban growing areas;
- we believe that the source of funding should be sustainable in time, and as such it should be encouraged (in order not to burden future generations with debt repayments) and ideally come from road users, that benefit from the infrastructure and generate externalities.
- tolling/charging is not only a mechanism to finance the needed investments on road infrastructure (to build, enlarge and make resilient the EU road network and adapt it to the digitalisation and green evolutions) but it is also a key mechanism to manage the traffic demand, boosting the transition to cleaner, safer, connected and automated vehicles and to place the right incentives to our mobility;
- we would like to recall that earmarked tolling has allowed the development of efficient safe road infrastructure with high-level of services, long-term optimization, proper maintenance and investments. These infrastructures achieve the best level of quality, safety and protection of the

environment and biodiversity, based on user/payer principle which is a sustainable financing scheme. The financing subject should be highlighted in the TEN-T regulation,

- Tolling / user financing regimes are the key to complete proposed TEN-T network and to ensure sustainable mobility solutions
- Revenues of toll regimes as well as investments supporting sustainable road transport should be considered as taxonomy conform
- more investments for mobility are needed as European cities are increasing in size and population. Time for commuting, congestion, air pollution and noise are increasing everywhere in Europe. To face those challenges, important investments will be needed to boost new mobility schemes and contribute to decarbonization of road transport to reach the target of carbon-free emission by 2050;
- investors can act in long-term liaison between administrations to ensure the pursuit of sustainable goals through long term public-private partnerships. The framework could rely on a transparent mechanism with an entity bearing and managing most of the risks, having an economic incentive to ensure that infrastructure, is resilient. This sustainable mechanism can be transferred to future generations in the same or better conditions. It has already been tested by concession models, public or private, and should be encouraged in compliance with the regulation.
- the private sector has the capacity to mobilize significant capital for investments in transport infrastructure. For this reason, policymakers should recognise the role of PPP model and mention it in the TEN-T guidelines as sustainable financing scheme.
- Regarding innovation and Intelligent Transport Systems (ITS) we would like to remind that ASECAP members are at the EU forefront and that interoperability and backward compatibility are of decisive importance for us to secure investments. Likewise, the protection of the 5.8 GHz DSRC technology (used e.g. for toll collection or the digital tachograph) against interferences from wireless internet access applications under discussion in vehicles and / or along motorways.
- Finally, with regard to "Greater coherence of TEN-T with military mobility network", we would like to state that the demands made by military stakeholders regarding clearance profiles and vehicle weights (up to 130 to max permissible weight) cannot be generally met. The existing infrastructure complies with certain dimensions and load classes and offers only very limited options for adaptation, especially with regard to tunnels and bridges.

About ASECAP:

ASECAP is the European Association of Operators of Toll Road Infrastructures across 20 member countries representing 135 companies employing more than 50.000 direct jobs and 200.000 indirect jobs. They operate, maintain, manage a network of more than 86.000 km with a long-term vision that ensures highest quality standards to make the road infrastructure safest thank to the user/payer principle providing sustainable financing. ASECAP members are shouldering their responsibility as mobility providers linking inter-urban and metropolitan areas, playing a major role by moving people for their daily trips to go to work, school, hospital.... ASECAP members are strongly committed to reduce carbon footprint of road infrastructure and reach vision zero target set up by the European Union and United nation.

Contact persons:

Malika Seddi –Secretary General (m.seddi@asecap.com)
EU transparency register : 76903725494-68