

OPEN CONSULTATION ACCOMPANYING THE IMPACT ASSESSMENT FOR THE REVISION OF THE TEN-T REGULATION

ASECAP CONTRIBUTION

The European Commission has launched an online open consultation accompanying the impact assessment for the revision of the TEN-T regulation to allow interested stakeholders to express their views.

ASECAP members welcome the revision of the TEN-T regulation. The context in which this consultation takes place has changed a lot since the first TEN-T regulations in 2013. The climate and environmental emergency, as well as the health and economic crises, have put transport at the heart of the European agenda. The Green Deal and the recent Strategy for sustainable and smart mobility are the most obvious illustrations.

ASECAP members would like to recall that TEN-T regulation must allow the transport network to be more resilient, efficient and effective in terms of climate objectives, connectivity and digitalization (implementing Green Deal and Climate change objectives to reduce the greenhouse gas emissions by 90% in the transport by 2050).

ASECAP members are strongly committed to reaching carbon-free objectives with 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.

ASECAP members support EU policy to make transport more sustainable by:

- stimulating actions improving transport sector carbon footprint,
- optimizing the entire transport system,
- supporting multimodal approaches and answer issues of mobility by unfolding new services and better use of the infrastructure (urban accesses, dedicated lanes for mass public transport, carpooling, multimodal hubs,...) where needs are in demand and the least satisfied, especially in important metropolitan areas of big cities.

Reducing CO2 emissions

Investing in new mobilities and creating safe and green connected motorways' network in Europe:

- Develop robust alternative fuel network (electrical fast-charging stations, H2-infrastructure)

- Welcome and develop strategies and concepts to use the road network itself for the generation of renewable energy
- Equip the structuring road network so as to transform it into an infrastructure able to dialogue with vehicles and influence CO₂ emission;
- Adapt and develop pricing measures in urban areas to reduce congestion
- Enhance traffic regulation to avoid congestion and minimize pollution emissions. This measure has been widely deployed on some motorway and needs to be extended,
- Welcome and privilege new motorizations (electric vehicles, etc)

Organizing connections between the motorway network and the cities and conurbations:

- Introducing traffic management/charging schemes to access big cities (access toll roads, congestion pricing cordon, dedicated managed lanes...)
- Delegate the management of penetrating channels up to the exchange multimodal points;
- Guarantee the modernization of these sections as well as their daily maintenance;
- Have the road users contribute to the creation/improvement of public transport systems and multimodal exchange platforms.

ASECAP members are convinced that the development of a sustainable Trans-European Transport Network (TEN-T) should consider 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. 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 transport infrastructure with local, regional and national transport within urban nodes are essential to increase the efficiency of the TEN-T network and to help eliminate bottlenecks.

Investing in the future of territories by guaranteeing the watering of the territories through the mobility infrastructures that are the most in phase with local transport services:

- Complete the current EU road network,
- Develop or complete the interchangers required for better irrigation of the territories.
- Implement and upgrade the drop lines easing the local transport services from the motorway network,
- Ease the new mobility usages via exchange platforms easily accessible (carpooling, local long-distance buses),

Enhancing road safety

ASECAP would like to recall that road safety, both for driver and staff working to maintain the infrastructure, remain priority of the toll road operators. Key recommendations would be knowledge and best practice sharing as well as to continue coordinated efforts made by policymakers and industry to manage the increase of traffic flows and to improve safety and reduction of congestion on the 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:

- Reduce further 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 shared by all stakeholders contributing to addressing the challenges related 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 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), based on mature and proven technologies.
- confirm their readiness to contribute to ambitious but always realistic deployment scenarios, namely for C-ITS. 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.

Saving life and reducing serious accidents is providing a high social return.

Considering the high priority underline to safeguard the environment

ASECAP vision of the motorway of the future consists of a set of solutions that could be also integrated into the TEN-T to extend the reach of that approach and take it forward to minimize the environmental impacts of a motorway throughout its lifecycle:

- 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 whereas already existing (regional/national) measures should be taken into account to avoid huge stranded investments.

Protecting biodiversity and flora

Protection of biodiversity should be also integrated into the TEN-T regulation. ASECAP members commitment to biodiversity starts at the motorway design stage for the recent motorway when comprehensive studies of existing biotopes and species are made:

- plan to preserve or relocate habitats is implemented.
- Improve old motorway to restore ecological continuity thanks to eco-bridges, eco-pipelines and facilities for animals
- Protect fauna species
- Use sustainable materials, which allow controlling water and noise pollution

Sustainable construction and operation

- Assessment and development of potentials to improve the CO₂ footprint of the road infrastructure over the entire life cycle.
- Concepts and Measures to ensure sustainable supply chains in the construction and operation of road infrastructure

General consideration & conclusion

- ASECAP believes that the TEN-T regulation should define sustainable funding mechanisms to implement those measures and reach the desired goals.
- Existing and proven charging mechanism as well as their underlying technologies, e.g. 5.8 GHz tolling technology must be protected.
- 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 the allocation of tolling revenues has allowed the development of efficient safe road infrastructure with a 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 the user/payer principle, which is a sustainable financing scheme.

- Provisions related to CO₂ emission class with reduction charging and eventual free charging for electrical vehicles have to ensure that the relevant part of the cost allocated to this category of vehicles (the infrastructure costs) are covered. These toll variations / exemptions will neither solve traffic congestion nor remove cars or truck from the road. Lower toll rates for electric vehicles should be allowed on high-density area and can be part of an integrated urban pricing policy, including new elements easing sustainable accesses to cities: managed lanes, high occupancy vehicles lanes, dissuasive parking, carpooling, bus rapid transit, etc.
- 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, toll road infrastructure operators are ready to invest to boost new mobility schemes and contribute to the decarbonization of road transport to reach the target of carbon-free emission by 2050.
- New road projects should be subject to an impact assessment determining its impact in transportation infrastructures located in the influence area of the new facility. The assessment should be based on economic, environmental and social criteria, measuring variables such as time savings, operational costs savings, environmental and social savings, as well as on wider economic effects like impact on GDP, employment, on public funds and public debt and deficit...
- Investors can act in long-term liaison with administrations to ensure the pursuit of sustainable goals through long-term public/private partnerships. 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 public or private concession models and should be encouraged in compliance with the regulation.
- ASECAP would like also to highlight that EU support/EU funds are always an important investment trigger especially when it comes to new technologies and innovations. ASECAP would therefore highly welcome a dedicated budget for innovative road projects, especially when it comes to CO₂ reducing activities, within European transport and mobility support programs, like the CEF 2 program.

About ASECAP:

ASECAP is the European Association of Operators of Toll Road Infrastructures across 21 member countries representing 142 companies employing more than 50.000 direct jobs and 200.000 indirect jobs. They operate, maintain, manage a network of more than 88.000 km with a long-term vision that ensures the highest quality standards to make the road infrastructure safest thank to the user/payer principle providing sustainable financing.

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