



**European Federation for Transport and Environment (T&E)**

**Naturskyddsforeningen i Stockholms lan (Stockholm Regional Branch of the Swedish Society for Nature Conservation)**

**Stichting De Noordzee (North Sea Foundation)**

**Bund für Umwelt und Naturschutz Deutschland (BUND)**

**Friends of the Earth International**

## **Motorways of the Sea – Implementation through Article 12a TEN-T Joint NGO Comments on the Consultation Document**

### **Background - Motorways of the Sea**

Shifting freight from European roads to the sea could be a cure against congestion and the growing environmental impact of trans-European transports. But safety risks, operational pollution from ships and uncoordinated port investments endanger the potential benefits of short sea shipping. Sea Motorways pose the dual-risk of increasing negative impacts and concentrating them on these new routes. This new idea of transport corridors must be linked to environmental criteria.

The concept of "Motorways of the Sea" is an integrated part of the Commission's 2001 White Paper on European transport policy for 2010. Waterborne freight transport is suggested in the White Paper as a means of coping with road congestion and constraints on railway infrastructure. One way to revive short-sea shipping is to build sea motorways within the framework of the master plan for the Trans-European Transport Network (TEN-T). In short, Sea Motorways are defined as a limited number of strategic connections between ports. Sea Motorways are in a list of 29 priority projects for investment, published by the European Commission. Subsidies should help to complement shipping links that are solely based on commercial conditions.

Sea Motorways are transnational maritime links that should be treated with the same importance as land links. EU Member States will be encouraged to jointly establish transnational maritime links with projects which:

- ?? can include both port and access infrastructure, electronic systems and start-up aids for new connections.
- ?? concern a limited number of ports and aims at developing transnational links to reduce congestion or link peripheral countries.

?? are proposed by at least two Member States who organise jointly an open tendering procedure.

The Commission has identified four different corridors: Baltic Sea Motorway, Western European Sea Motorway, South-Eastern European Sea Motorway, South-Western European Sea Motorway.

The adoption of Article 12a of the TEN-T Guidelines by the Council and Parliament in April 2004 gives a legal framework for the funding of the "motorways of the sea". The article gives the three main objectives: freight flow concentration on sea-based logistical routes, increasing cohesion and reducing road congestion through modal shift.

To fulfill those objectives, the initial step is a clear choice by the European Commission and Member States with regard to ports, corridors and services. Second, all involved infrastructure managers and infrastructure users need to be committed and involved in a selected Sea Motorways project. Third, to provide a real alternative solution, Sea Motorways need to address quality issues.

On this background, the Commission (DG Transport & Energy) is calling for comments on Art. 12a TEN-T and in particular the selection criteria for Motorways of the Sea.

### **Question 1:**

#### **Views on the tendering procedure mentioned in Art. 12a(4), and suggestions on its practical implementation**

Given that most of the Motorways of the Sea investments would be carried out in ports and harbour areas, a Strategic Environmental Assessment (SEA) of the planned routes, as part of the TENs network should be carried out jointly by the Member States involved and the European Commission. Given the European priority status of such investments, the Commission should take a coordinating role in carrying out the relevant assessments.

Such SEA should not only look at the environmental impact of the route itself, but also include a thorough assessment of the port developments involved, the environmental consequences of changes in transport patterns in the hinterland and a cost-benefit analysis. For example, the SEA for the Gdansk-Helsinki route would include information related to the Baltic Sea bird habitats as well as two complete SEAs for the ports.

Environmental NGOs should be part of the consultation process of these SEAs.

Under point 2.2 in the consultation document, two alternatives for the tendering procedure are spelt out. In order to ensure the commitment of all involved parties, from the construction, management and use of the Sea Motorway, Member States should issue a wider call for proposals to consortia.

**Question 2:**

**Views on the assessment and selection criteria proposed in this paper; would you add any criterion?**

Short Sea Shipping is considered a sustainable alternative for surface transport. In order not to lose this advantage, the Motorways of the sea should be set up with high environmental standards.

The selection criteria presented in 2.3 are missing an environmental perspective on Motorways of the Sea. According to the conclusions of the 1999 Luxemburg Transport Council, the 2001 Gothenburg Council and the Treaty of Nice (Art 2 and 16), environmental policy is an integral part of all policy areas. In order to fulfil this commitment, we ask for the inclusion of a set of environmental criteria.

The set of environmental criteria should include minimum requirements, for instance the use of low-sulphur fuel for operation of ships at sea and berth, the existence of environmental and risk management plans in all ports, and standards with regard to emissions to air (SO<sub>x</sub>, NO<sub>x</sub>, particulate matter, CO<sub>2</sub>), water (anti-fouling, operational discharge of ballast water) and the life cycle management of ships. Furthermore, the existence of incentives schemes for quality shipping, like differentiated port dues, shore-side electricity supply and environmental management systems should be considered as an advantage in the tendering process. Special consideration should be given to the promotion of the Clean Ship Concept, as adopted by the Northsea ministerial conference in Bergen 2002.

Sea motorways with only rail and/or waterways as hinterland connection should be given priority over sea corridors that include road freight.

If a motorway of the sea project focuses on cohesion and improving accessibility for remote regions, it often will lead to more transport. In such cases, there should be requirements to use best practice and the cleanest technology in all parts of the transport chain to assure the least possible environmental impact.

**Question 3:**

**Comments on the list of possible quality features of motorways of the sea, listed in Annex I to this document;**

New Category (Criteria under Responsibility of the European Commission):

- ?? Carrying out of a Strategic Environmental Impact Assessment (SEA)
- ?? Cost-benefit analysis

Additions to A (Criteria under State Responsibility):

- ?? Assessment of the Impact on Hinterland Connections (National Transport Plan)
- ?? Coordinated Port Planning on a Member State Level
- ?? Spatial Planning of Ports: Reducing the Spatial Impact

Additions to B (Criteria for Port Authorities and Terminal Operators):

- ?? Environmental and Safety Risk Management Plans
- ?? Environmental Management System
- ?? Economic Incentives for Quality Ships
- ?? Electricity Supply for Ships at Berth
- ?? For the Motorway of the Baltic Sea: no-special-fee system for port reception facilities according to HELCOM recommendations
- ?? Efficient and standardised Port Reception Facilities for Garbage, Waste Oil and Cargo Waste

Additions to C (Criteria for Maritime Service Operators):

- ?? Commitment to Quality Shipping and the Clean Ship Concept
- ?? Environmental Management System, i.e. ISO 14000 or EMAS
- ?? Reductions of Atmospheric Pollution on Board through Clean Fuels, Exhaust Gas Treatment, Efficient Engines and Voyage Planning.
- ?? Fuels used by maritime service operators should have no more than 1% sulphur and 0.1% sulphur for ships at berth; plus additional nitrogen oxide abatement.
- ?? Onboard Connection for Shore-side Electricity

**Question 4:**

**Concrete suggestions on the legal framework for the Motorways of the Sea consortia (joint venture agreement, European company etc.)**

none

**Question 5:**

**Do you have any other comment on this paper and its general approach?**

none

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