

Commission's proposal for a Regulation establishing the Connecting Europe Facility¹

ACEA's comments

The main elements of the ACEA comments on the CEF proposal are:

1. ACEA supports the Commission's intention to review the current TEN-T policy, and notes the Commission's view that the development of **all transport modes** is one of the objectives of the revision;
2. ACEA regrets however that the CEF proposal, **in clear contradiction with the TEN-T revision proposal, excludes road** from the possibility of getting grants for works, and excludes road from the list of pre-identified projects in the core network corridors (these are the corridors that will benefit from the CEF funding);
3. ACEA notes that the assumption made in the CEF proposal that some modes of transport would be, by definition, more environmentally friendly than others, is not correct. **Modal shift is suitable from an environmental point of view in some very specific cases;**
4. The Commission's CEF proposal does **not propose a rigorous, clear and transparent methodology to identify and select projects** that will benefit from the CEF. The only criteria seem to be that they should be "non-road projects";
5. The Commission proposes in the CEF text that its services are empowered to adopt **delegated acts to modify essential parts** of the CEF proposal: this will **deprive in practice the EP and the Council of their powers;**
6. **Europe's transport infrastructure, especially its road network, requires funding** for key transport projects. This is particularly so in view of the huge contribution that road in particular makes to the tax revenue of the Member States.

Specific details:

1. **ACEA, the European Automotive Manufacturers Association, very much supports** the Commission's intention to review the TENs Transport (TEN-T) policy and to fund key investment to improve Europe's transport networks. Indeed, the political, economic and social context has changed since the TEN-T policy was conceived in the 1990s for an EU of 15 Member States. Such evolution justifies **a fundamental review** of the policy rather than just a review of the priority projects.
2. However, ACEA wants to express its concerns regarding the assumptions that are behind the Commission's proposal for a so called **Connecting Europe Facility (CEF)**. ACEA regrets that **road is the only mode of transport that is excluded** from the possibility of getting grants for works (article 10.2 (b) of the CEF proposal) and notes that no road project is pre-identified in the core network corridors listed in the Annex of the proposal. From a total of 101 pre-identified sections, 75 refer to rail and 26 refer to ports, IWW (Inland Waterways) and MoS (Motorways of the Sea).
3. ACEA notes that the proposed CEF is **inconsistent with the Commission's proposal for the revision of the TEN-T guidelines**², which clearly indicates that the development of all transport modes is one of the

¹ [COM\(2011\) 665 of 19.10.2011](#)

objectives that shall be pursued in developing the infrastructure of the trans-European transport network (article 4.2 of the TEN-T proposal).

4. ACEA regrets that the Commission insists on addressing transport infrastructure funding policy on the basis of “modes of transport” rather than “efficient transport” and **deplores that the Commission has based its proposal on the assumption that some modes of transport would be, by definition, more environmentally friendly than others** and should therefore be given preeminence over the others. Establishing lists of priority projects with non-road projects exclusively because they are generally perceived as more environmentally friendly than road projects is therefore the wrong approach and does not help the European Union to provide a sustainable transport system based on social, economic and environmental needs. Contrary to a wide spread belief, **modal shift is suitable from an environmental point of view in some very specific cases**, but it is neither possible nor suitable in the majority of the traffic flows³.
5. The **criteria applied by the Commission in the CEF proposal for choosing both the core network corridors and the pre-identified projects is unclear and not transparent**. Moreover the proposal made in the text (articles 20 and 25 of the CEF proposal) to empower the Commission to adopt delegated acts to modify the lists provided in the Annex causes particular concern as it **deprives in practice the European Parliament and the Council of their ability to control** closely the actual implementation of the CEF.
6. Regarding the **pre-identified projects** (Annex to the CEF proposal), and besides the usual references to the modal shift targets established in the Commission's White Paper on Transport Policy, there is **no clear justification in the CEF for this choice in economic or environmental terms**. The Commission has **failed to develop a rigorous methodology to identify and select the projects** that will benefit from the CEF. Projects should be subject to a strict environmental and socio-economic evaluation and to rigorous cost/benefit analysis. This is lacking in the proposal.
7. A confirmation of the previous paragraph can be found in the text of the proposal itself. The Commission lists the **indicators** that will be used for an assessment *a posteriori* of the performance of the CEF. Both the **reduction of greenhouse gas emissions** and the **increase in energy efficiency** will be indicators on which basis the Commission will evaluate the CEF performance. However, the Commission itself recognizes that the **methodology of calculating these two indicators "still has to be developed"** (pages 59 and 60, Annex to the CEF proposal).
8. The Commission's proposal for a CEF is based on the **assumption that rail in general and high-speed rail transport in particular are by definition better from an economic and environmental perspective**. This is an **assumption** that is challenged by experts and that **the Commission is systematically failing to support with concrete data**. Impact Assessments of both the White Paper on Transport Policy and the CEF proposal do not assess concretely the economic and environmental benefits of such mode-biased approach.
9. Europe's transport infrastructure, especially its road network, is falling behind what is required for a modern economy. This is mainly due to **lack of investment. This has contributed to bottlenecks and increased congestion and CO2 emissions**. Europe should be funding key transport projects that will not only modernize Europe's infrastructure, but will also help reducing negative environmental impacts by developing existing, new and smarter infrastructure. Europe should not be lagging behind other leading economies: **it needs funding for key transport projects**. This is particularly so in view of the huge contribution that transport and road in particular, has made and will still be making to the tax revenue of the Member States.

² [COM\(2011\) 650/2 of 19.10.2011](#)

³ [see paragraphs 27 to 31 of ACEA comments of 22 June 2011 on the White Paper on Transport Policy](#)