



**Mr Cosmin Boianiu**  
Permanent Representation of Romania to the  
European Union  
107 Avenue de Cortenbergh  
B - 1000 Brussels  
BELGIUM

17 May 2019

Dear Deputy Permanent Representative,

**RE: Streamlining measures for advancing the realisation of the TEN-T network**

BusinessEurope has long stressed the importance of a solid EU-wide transport network to support a well-functioning Single Market and contribute towards Europe's competitiveness. As demand for transport services is only becoming greater, so does the need to expand and improve Europe's transport infrastructure. Completion of the trans-European transport network (TEN-T) on time must therefore be an absolute priority.

The availability of sufficient funds for TEN-T projects is imperative, which is why BusinessEurope has been calling for an increased budget for transport infrastructure under the renewed Connecting Europe Facility. At the same time, an effective regulatory and administrative framework for the implementation of projects is also crucial. However, in many Member States a fragmented approach leads to unnecessary delays, costs, and uncertainties, which in turn discourages much needed private investment.

For instance, in Hungary eight separate permit granting procedures must be completed, in Romania six/seven, and in the Czech Republic at least four. Multiple permitting authorities are also involved – up to seven in the case of Romania and up to six for projects in Hungary. Moreover, many projects on the TEN-T's core network are cross-border, where there is no established coordination between Member States.

The Commission's proposal for a Regulation on streamlining measures for advancing the realisation of the TEN-T network is therefore strongly needed and has been welcomed by BusinessEurope in a previous position paper (17 October 2018). The introduction of national single competent authorities, the integration of different procedures under a single comprehensive decision, the establishment of an overarching procedural timeframe, and enhanced cross-border coordination are all considered to be effective measures.

**While we understand there is support among Member States for the objectives of the proposal, BusinessEurope is concerned that work in the Working Party on Transport, Intermodal Questions and Networks will unduly water down some of the proposal's core elements.** We accept that some additional flexibility may be needed to ensure that the proposed framework will be implementable within national systems.

**However, we strongly urge that this flexibility does not go so far as to undermine the effectiveness of the proposal in achieving its goals.**

As an example, introducing the option for Member States to restrict the role of the single competent authority to just coordination between the different authorities, without granting it any extended decision-making powers, would reduce its effectiveness. Under such a 'collaborative scheme' the single competent authority does not have the ability to avoid overall authorisation delays resulting from delays by other authorities. This is particularly troubling where sequential authorisation is needed in which case the entire process can come to a halt. Experience under the TEN-E Regulation has shown that when given the option, the majority of Member States (15) opted for such a 'collaborative' option. Additionally, we consider that a regulation is the most appropriate form of legislation to ensure that its aims are achieved.

We trust in your support and stand ready to cooperate on this important issue.

Yours sincerely,



Markus J. Beyrer