



Position of the European Sea Ports Organisation

in contribution to the Public Consultation accompanying the Impact Assessment for the revision of the TEN-T Regulation (EU)1315/2013

April 2021

1. Introduction

The European Sea Ports Organisation (ESPO) welcomes the opportunity to participate in the public consultation on the review of the Regulation 1315/2013 on Union Guidelines for the development of the trans-European transport network.

In 2019, ESPO had submitted a position paper on the evaluation of the TEN-T guidelines, of which many points remain valid.¹ The current paper aims at reiterating and complementing the main points of the existing position, responding to the questions raised in the Commission's current public consultation and addressing the developments that have been occurring over the last two years.

ESPO remains **a strong supporter of Europe's transport infrastructure policy framework** as set out in Regulation (EU)1315/2013, recognising seaports as strategic nodes of the network. While the rationale and basic aims of the TEN-T policy should not be changed, ESPO fully endorses the upcoming revision as a way to make the network more robust. The revision will have to address new market realities, new societal challenges, in particular the green and digital transitions, new political objectives, a resilient recovery and the changing role of European seaports.

European ports play a critical role in the supply and distribution of goods and in keeping the European economy running, as has been demonstrated over the last year. As gateways to the world, being at the crossroads of supply chains, hubs of energy, industry and blue economy, ports can substantially contribute to a sustainable, digital and resilient European recovery.

In order to fulfil their roles as **engines of growth and recovery**, it is important to support and step-up investments in European seaports enabling them to remain resilient and fit for a sustainable and digital future. Port investment needs in infrastructure and enhanced capacity will also remain valid, notwithstanding short-term volume drops experienced during the pandemic. Moreover, maritime ports need to modernise and adapt basic infrastructure and create additional capacity to serve the new responsibilities, such as in the area of circularity, sustainability and energy provision. The expected diversification of supply chains and nearshoring of industry will also change connectivity needs and possibly increase interest in ports as location to accommodate certain industries. **Investing**

¹ <https://www.espo.be/views/ten-t-review-consultation>

in Europe's seaports must be seen as investing in strategic and critical infrastructure, which should account for a larger share of the Connecting Europe Facility II than the 4% under the previous CEF².

2. The changing role of ports

The European Union is highly dependent on seaports, both for trade with the rest of the world and for trade between Member States. 74% of goods (in tonnes) imported and exported and 37% of intra-EU transport flows make use of seaports.

In addition to freight transport, about 400 million passengers embark and disembark in EU ports every year on average.

As crucial nodes in the supply chains, connecting maritime and hinterland transport of goods and passengers remains the core task of European seaports. However, they are **increasingly taking up new responsibilities** and are involved in new services. These related to sustainable energy production, transport and supply, circular economy, blue economy sectors, carbon capture, utilisation and storage, as well as industrial ecology, to name some.

As **multimodal hubs**, European ports play a critical role in facilitating sustainable transport alternatives and reducing road congestion.

As **hubs of energy**, seaports will be a partner in Europe's energy transition through the transport, production, provision and storage of alternative fuels and off-shore activities.

As **hubs of industry**, seaports directly bring together industry, trade lanes and hinterland distribution, avoiding unnecessary additional transport.

As **hubs of circular economy**, European ports can facilitate a more sustainable and circular use of materials and waste between the different actors in the port area (both onshore and at sea) and enhance the circular use of waste and energy between port a city.

As **hubs of employment**, ports are a major employer for the region and beyond. They will thus play an important role in the EU's recovery.

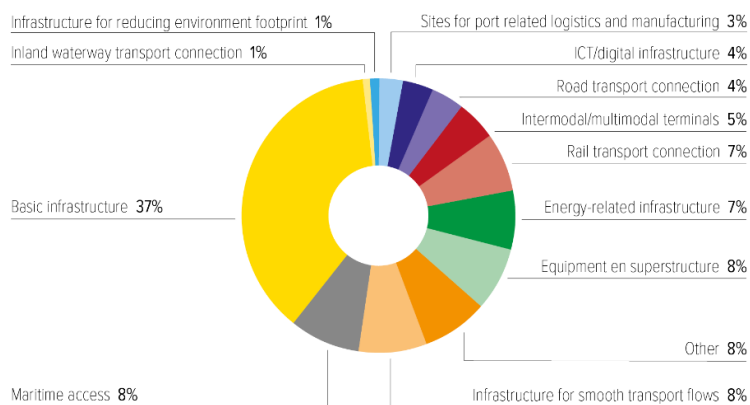
More than 90% of Europe's seaports are part of or in close proximity to urban agglomerations. By developing towards multi-sectoral clusters and bringing different parts of the economy together, Europe's **urban seaports bring more and more added value to urban agglomerations and become instrumental in alleviating urban congestion and pollution**. They provide cities a direct access to large volumes of cargo and can offer citizens sustainable transport connections.

Throughout the border closing and travel restrictions caused by the COVID-19 pandemic, European seaports have remained operational and have been **agile and flexible to adapt to the new circumstances**, in order to ensure the supply of essential goods and medical equipment to Europe's citizens. They have proven to be an essential and strategic part for a resilient European transport system and for functioning supply chains with third countries.

² The Infrastructure Needs and Financing Challenge of European Ports
https://www.espo.be/media/Port%20Investment%20Study%202018_FINAL_1.pdf

3. Basic infrastructure needs remain, but additional diverse infrastructure needs come on top

In 2018, ESPO carried out a study on the “Infrastructure Investment Needs and Financing Challenge of European Ports”, analysing the project pipelines of European port managing bodies. While the analysis revealed a broad range of project types, it confirmed the continued importance of basic infrastructure. Investments in basic infrastructure, maritime access infrastructure, and transport-related infrastructure (transport connections to rail, road, inland waterways) to deliver their core tasks make up 65% of all port projects submitted by port authorities.³



Percentage of projects planned per port infrastructure category 2021 – 2027
Source: ESPO Port Investment Study 2018

As diverse European ports are in terms of their geographical location, their different maritime cargo and passenger flows, the sectors and industries present in the port area and in terms of their hinterland connections, as diverse are their infrastructure needs.

These needs are not only driven by capacity expansion and traffic growth expectations, but also a variety of other factors. This holds true also for basic infrastructure investments, which are not necessarily driven by increased capacity needs, but also by changing sustainability and efficiency requirements, changing traffics or commodities and new roles of port managing bodies.

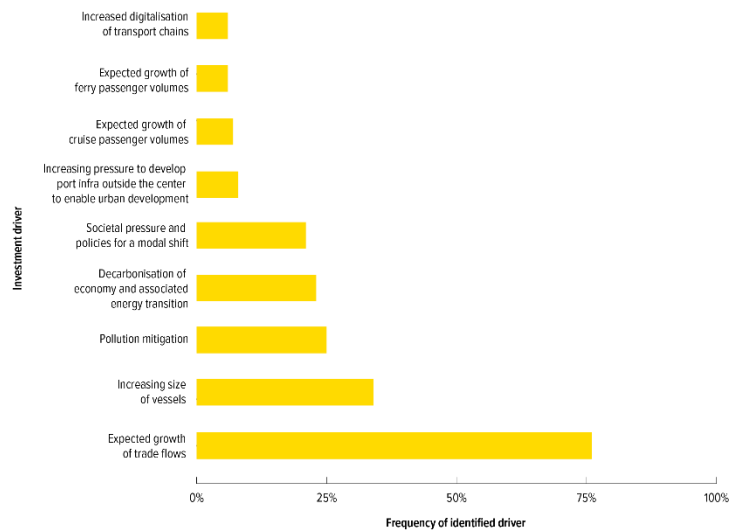
In terms of changing traffics for example, geopolitical changes and the required new connections play a role. The withdrawal of the UK from the Union is one example, which is driving infrastructure needs to accommodate new maritime connections between Ireland and Europe’s mainland.

The energy transition will have a substantial impact on the transported goods. The transport of fossil fuels will decline substantially, whereas the for example the transport by pipelines or of containerised cargo is likely to increase further. These changes in the transported commodities require infrastructure adjustments in the ports, as well as in the hinterland.

In relation to the new roles of port managing bodies, new or upgraded basic infrastructures might become necessary in order to accommodate off-shore activities and services to off-shore platforms.

³ ESPO port investment study
https://www.espo.be/media/Port%20Investment%20Study%202018_FINAL_1.pdf

The increasing sustainability concerns and requirements might also require rebuilding or upgrading existing basic infrastructure.



Relevance of investment driver
Source: ESPO Port Investment Study 2018

4. The main goals of EU Transport Infrastructure policy

As multimodal transport nodes, European seaports depend on a well-functioning TEN-T network and therefore fully support the objective of establishing an efficient, sustainable, digital, and safe European transport network, providing accessibility and connectivity to all EU regions. The main priority for ESPO is **the finalisation of the Core and Comprehensive network**, by facilitating cross-border connectivity, removing bottlenecks, closing missing links and by connecting the different transport modes in a seamless way.

Even if seaports are situated in one Member State, they are Europe’s gateways for trade with other EU Member States and third countries and serve a hinterland and a catchment area which goes beyond their local and national borders. Given their international reach, both in terms of maritime transport and hinterland transport, ESPO believes that **seaports should be considered cross-border actors**. Port projects which create a value for the society that exceeds the national borders, by increasing connectivity on the sea side and by enhancing the connectivity with the wider hinterland and economy, as well as increasing the sustainability of the transport and logistics chain, **should be prioritised on an equal basis with cross-border land transport infrastructure projects**.

In addition to the completion of the network, **the efficient use and the modernisation of the existing network** becomes more and more relevant, which will be necessary to meet the challenges for environmental sustainability and digitalisation of the transport network. European ports believe that the greening and digitalisation of transport should be primarily defined by Europe’s transport policy and that the objective of the TEN-T guidelines should mainly focus on providing the necessary infrastructure and facilities, recognising the requirements set in the relevant transport legislation.

5. A strong maritime dimension: levelling the playing field

In order, to complete the TEN-T network, it is necessary to pay **special attention to the maritime dimension** and to put it on an equal footing with the land-based network. Promoting short-sea shipping (SSS) connections will be important to reach the modal shift target of the Sustainable and Smart Mobility Strategy⁴, as well as to support a diversification of supply chains and near-shoring to third countries sharing sea basins with the European Union.

Short-sea shipping should be recognised in the TEN-T regulation as a transport mode on equal footing with the other modes. European ports consider that any **maritime link between comprehensive ports, core and comprehensive ports, or core ports should be recognised under the TEN-T Regulation**.

In particular, ESPO believes that the current **Motorways of the Sea (MoS) project requirements are too complex** to utilise the full potential of Motorways of the Sea. Some of the requirements seem to be more appropriate as a priority for a given call (f.e. application by at least two Member States), than as a feature of the maritime dimension of the TEN-T network. Short-sea shipping should be strongly facilitated as an equally important transport mode for intra-European transport, both in terms of cargo and passengers, next to rail, road and/or inland waterway transport. In this regard, **short-sea links within one Member State** should also be incorporated, including those short-sea links that are part of a corridor.

European maritime ports can serve as **enablers of re- and near-shoring of production, as enablers of more diversified supply chains** and as locations for strategic reserves and/or production. Motorways of the Sea and short-sea shipping can accompany this development as flexible solutions for the necessary new transport connections and as a resilient mode in times of border crossing restrictions. In the framework of nearshoring, the strengthening of MoS links with third countries neighbouring the EU will become increasingly important.

The **withdrawal of the UK from the European Union**, has removed the so-called land bridge, connecting Ireland via the UK with mainland Europe, from the TEN-T maps. Increased administrative and customs procedures make this link less cost-effective. ESPO supports the agreed adjustments of the affected corridors, and stresses the **importance of new maritime connections and MoS links**, connecting Ireland directly with mainland Europe. ESPO also favours a re-definition of the EU-UK maritime links as EU-neighbouring connectivity.

To reach the European Commission's objective **to increase transport by short sea shipping by 25% by 2030 and by 50% by 2050** (compared to 2015 levels), as set out in its Sustainable and Smart Mobility Strategy, **enabling and supporting European policies and initiatives are needed**. European ports are concerned that neither the EU Green Deal Communication and the accompanying Action Plan, nor the Sustainable and Smart Mobility Strategy include sufficient initiatives to this end.

6. Greening the TEN-T network

The **greening of shipping is a priority for European ports** and they are facilitating the greening of the sector mainly by investing in alternative fuels infrastructure and on-shore power supply. As more and

⁴ COM(2020) 789

more options and pathways for greening are being explored, it becomes more difficult for a port to accommodate these different solutions or to make the right choice in order to avoid stranded assets. ESPO stresses that **the revision of the TEN-T, the revision of the Alternative Fuels Infrastructure Directive and FuelEU Maritime need to be closely linked**, both in terms of timing and contents, to ensure coherent legislation for infrastructure providers and users. The approach should remain technology neutral in order to respect the diversity of ports and their maritime customers and to encourage and allow also future solutions.

European seaports consider that the only way to ensure a rapid deployment of OPS and to avoid a waste of public funds is to **focus on deploying OPS where it makes sense, namely where it delivers cost-effective reductions of greenhouse gas emissions and air pollution at berth**. Together with its members, ESPO has put forward a framework that can guide ports and policy makers in developing an effective and intelligent approach for OPS⁵, which will be an important consideration for the revision of the Alternative Fuels Infrastructure Directive.

In addition to facilitating the greening of shipping, European ports continuously strive to improve the sustainability of their own operations, as well as of the overall port area. To reduce negative externalities or to improve the efficiency of infrastructure and logistics chains, investments in upgrading or moving existing infrastructure are necessary in certain cases.

Furthermore, the decarbonisation and greening of the European economy as a whole will require **infrastructure adaptation in seaports in order to accommodate new commodity flows and new products**. To illustrate this, ports that serve as landing point for off-shore energy will need to ensure their infrastructure (quays, access lanes to the port, etc.) supports the handling of the necessary transport and operations of the relevant cargo, such as the larger blades for wind energy.

European seaports are **increasingly taking up new responsibilities** and are involved in new services, such as sustainable energy production, transport and supply, circular economy, blue economy sectors, carbon capture, utilisation and storage, as well as industrial ecology. These activities support the further decarbonisation and greening of the transport system and the port area, but will require the adequate infrastructure and possibly extra capacity in order for European ports to offer their full potential.

7. Adjustment of the network

ESPO **supports the concept of the dual-layered core and comprehensive TEN-T network with multimodal corridors**. In order to enable a timely completion of the network, European ports believe that no major changes should be made to the TEN-T network, but that minor adjustments are needed to account for changing realities.

The TEN-T network should provide and support the needed infrastructure to accommodate the actual traffic flows. The guidelines therefore need to be flexible enough to account for changing traffic flows, as for example caused by the withdrawal of the UK from the Union.

The TEN-T Regulation establishes in article 20, paragraph 2 a) and b) a set of **quantitative thresholds for identifying which maritime ports are part of the comprehensive network**. In order to be included

⁵ [https://www.espo.be/media/ESPO%20Communication%20-%20Towards%20an%20intelligent%20legislative%20framework%20for%20Onshore%20Power%20Supply%20\(OPS\)_1.pdf](https://www.espo.be/media/ESPO%20Communication%20-%20Towards%20an%20intelligent%20legislative%20framework%20for%20Onshore%20Power%20Supply%20(OPS)_1.pdf)

in the comprehensive network, the seaport's freight or passenger volume has to exceed 0,1 % of the total EU volume handled in all maritime ports of the Union. The criteria for being a core TEN-T port are laid down in the staff working document SWD(2013)542, setting the cargo threshold of exceeding 1% of total EU volumes, but no threshold for passenger flows.

The UK's maritime ports handled 486.1 million tonnes of cargo in 2019, which amounts to about 12% of the total cargo volume handled annually by European ports in 2019. In terms of passenger traffic, UK maritime ports handled about 6% of the total EU passenger volume. Following the withdrawal of the UK, the EU volumes which form the basis for identifying core and comprehensive ports are changing significantly. **ESPO calls on adjusting the current TEN-T thresholds to ensure a stable core and comprehensive network**, while also highlighting that transport volumes should not be the only decisive factor. The role of a port for the respective Member State should also be taken into consideration.

As the status of being a Core or Comprehensive port often defines the application of other EU legislation⁶, European seaports consider a stable network highly important. The calculation of the thresholds should therefore take into account sufficiently long periods in order to avoid volatility of the network and sudden changes in the status of a given port.

Traffic flows will also be impacted by an increasing diversification of supply chains and the resulting near-shoring. European ports **support the extension of the TEN-T network with those neighbouring countries with which the Union has signed a high-level agreement on transport infrastructure networks**. Maritime connectivity should be promoted across the Baltic sea basin, the North Sea basin, the Black sea basin and the Mediterranean, as well as to and from the EU's outermost regions, through investments in European seaports and further encouragement of Motorways of the Sea links with third countries.

In addition, the **energy transition** will also impact cargo flows of Europe's ports. While oil and coal will be decreasing, new container flows and pipelines transport are likely to increase sharply. These developments will **impact on ports' needs in terms of port infrastructure adaptation, connectivity and hinterland links**.

In terms of horizontal priorities, **being a core or comprehensive port is not always the defining factor whether certain infrastructures are necessary**. Comprehensive ports can face equally important needs to facilitate the green transition in transport and/or to make the logistics chain more efficient by implementing or improving digital infrastructure.

Since 2013, European seaports are increasingly involved in a process of cooperation, clustering and merging. With this development, ports respond to the overall scale increase in the maritime, transport and logistics sectors. Moreover, by bringing ports with complementary functions together the integration process between different ports, also with inland ports, can contribute to enhancing the efficiency of the transport network, which is one of the main aims of the TEN-T policy.

ESPO believes that **clustering and cooperation of ports should be encouraged and recognised in the TEN-T policy**. Fully merged ports with a single economic integrated plan should be recognised as one port within the network. In some cases the clustering, cooperation and merger between different ports in Europe, both top-down and bottom-up, risks to cut across the initial identification of "core"

⁶ E.g. The 2017 Port Service Regulation, which provides a framework for the provision of port services and common rules on the financial transparency of ports, applies to core and comprehensive ports. Ports have to apply this Regulation since March 2019.

and “comprehensive” ports. This development may require the TEN-T policy to approach ports not only in function of their “comprehensive” or “core” status and volume criteria, but to consider them as well in view of their function in and contribution to the TEN-T network and/or on the TEN-T corridor(s). This does not necessarily mean that the respective TEN-T status of the individual ports of the merged entity, including the requirements on their hinterland connections, should be changed.

The TEN-T review needs to take into consideration that merged ports have created new entities. Therefore, Annex II should reflect mergers of ports by listing both the name and locations of the different parts.

8. Ports as strategic nodes

In the current TEN-T guidelines, **maritime ports have been rightly defined as strategic nodes of the transport network**, connecting all modes of transport. Port managing bodies connect deep sea and short sea shipping with rail, road, inland waterways and pipelines and provide digital solutions to the stakeholders of the port ecosystem, enabling efficient logistics chains. Port managing bodies can therefore be considered as genuine community managers, accommodating and connecting all modes of transport.

Whereas ports are recognised as strategic nodes in the current TEN-T guidelines, they are mainly considered as a component of maritime transport infrastructure and their infrastructure requirements are defined in that section of the TEN-T guidelines. ESPO believes that **the multimodal character of ports should be strengthened in the regulation**, as they do not only include maritime infrastructure components, but also transport infrastructure such as roads, bridges, tunnels, junctions, parking areas, pipelines, freight terminals and logistic platforms, railway tracks, sidings and marshalling yards.

In addition, more than 90% of Europe’s seaports are part of or in close proximity to urban agglomerations. By developing towards multi-sectoral clusters and bringing different parts of the economy together, **Europe’s urban seaports** bring more and more added-value to urban agglomerations. They **become instrumental in alleviating urban congestion and pollution through sustainable hinterland connections**. The ports provide cities a direct access to large volumes of cargo and provide a sustainable entry and exit for citizens and tourists. They should therefore be **considered as an essential requirement for TEN-T urban nodes, where TEN-T ports and recognised urban nodes overlap**.

Last-mile connection often remain a bottleneck and seamless connectivity, using all transport modes, for both freight and passengers, is crucial both to connect the port and the city and to reduce congestion and unnecessary externalities. **As producers, suppliers and facilitators of clean energy solutions European ports can also support the urban nodes in their decarbonisation efforts**. They can create synergies between the industries in the port, and bring production and labour closer to the urban agglomerations and centres of consumption.

To address the capacity needs, port managing bodies often use so-called dry ports/terminals within a few kilometers outside the port area, extending the port gateway to the hinterland. The TEN-T guidelines will be an important tool to increase the terminal capacity across the network, which is necessary to boost the intermodal transport.

9. Last-mile a first priority

Furthermore, it is important to **define the connections to seaports in coherence with their TEN-T status**. When a port is defined as a TEN-T core port, the land-based transport connections, including the last-mile connection, should equally be part of the TEN-T core rail network, core road or core IWT network.

In order to facilitate multimodal transport chains, more emphasis needs to be placed on the multimodal connecting points, **recognising the role many seaports are playing as strategic multimodal nodes**. The future TEN-T regulation should therefore put a stronger emphasis on seaports as multimodal transport nodes.

To boost rail freight, ESPO **strongly support the alignment of the Rail Freight Corridors, ERTMS Corridors and the TEN-T corridors**. For European ports, both the rail connections to the national network, as well as across borders are important for their operations. The ports depend on external authorities and stakeholders for the development and management of the rail infrastructure and services outside the port area. To enable smooth cross-border freight transport by rail, operational and technical barriers still need to be removed and the allocation of high-quality freight train paths to and from European ports increased, including high-quality diversion routes in cases of planned or unforeseen disruptions on the network.

In that context **it is important, to clearly define the “last mile” in a coherent way across European and national transport legislation**. In some European seaports, the national rail infrastructure manager is responsible for the rail infrastructure inside the port area, in other Member States, the port managing body is the rail infrastructure manager inside the port area, and mixed systems exist as well. The **definition should** remain neutral on the governance model of the rail infrastructure inside the port area and **focus on the connection between the loading/unloading terminal on the national network to the loading/unloading terminal inside the port area**.

The major share of inland waterway freight passes through European seaports. In order to strengthen inland waterway transport, **investments in inland waterway infrastructure in seaports, as well as adequate inland waterway links to and from seaports are essential**. In line with the infrastructure for other transport modes, for inland waterway transport a **dual network approach** should be explored with higher standards for the most frequented inland waterways and a focus on navigability for a possible complementary comprehensive network.

In the context of sustainable transport, **pipelines, used for transport within and beyond the port area, should also be recognised as a sustainable mode of transport** when reviewing the TEN-T guidelines. In view of the energy transition, transport by pipelines of energy products and commodities will become a more widely used sustainable alternative.

10. European seaports are critical for a resilient transport system

The TEN-T network must be considered as Europe’s lifeline and backbone of the internal market, which has to remain open, also in crises periods, enabling the efficient transport to final destinations of the cargo. In general, the **TEN-T core network corridor status has to be legally strengthened in order to avoid that its development is hampered by individual Member States or regions**. Increasing the transport network’s resilience means addressing both the capacity of the network, the efficiency

of operations and the use of existing infrastructure as well as efficient and adequate border inspection services for passengers and goods. ESPO **strongly supports the strengthening of the European TEN-T Corridor Coordinators and stronger implementation and enforcement at the European level.** Diverging Member States' investment or infrastructure priorities should not block or slow down the completion of the European transport network. National infrastructure plans should take into account and align where relevant with the corridor workplans of the European Coordinators.

Since the start of the COVID-19 crisis, Europe's ports have been doing everything possible to ensure the continuity of their operations and thus the security of supply. European ports have successfully activated contingency plans, demonstrating their role as essential and critical infrastructures, being crucial in the supply of necessary goods. By being fully operational, flexible and by adapting quickly to the circumstances, **European ports have contributed to the resilience of supply chains to the benefit of European citizens and Europe's economy as a whole.**

However, it should be clear that the recognition of the strategic and critical role of European ports is not limited to the context of the current pandemic crisis. The increasingly instable geopolitical circumstances also have an impact on European ports and are therefore equally relevant in this context.

In addition, **European seaports are strategic assets which are much desired as investment by certain third countries** to gain geopolitical influence in Europe. Investments into essential and/or critical European port infrastructure of general interest, which enable effective participation in the management or control of a company, should therefore be assessed from that perspective.

In terms of **climate resilience**, waterborne transport and ports must be prioritised in climate resilience and adaptation efforts. European seaports are first in line to be hit by the consequences of climate change, including rising sea levels and extreme weather. Therefore, it is important, that the upcoming climate adaptation strategy recognises the adaptation needs of seaports.

11. Enhancing the digitalisation of the port ecosystem

Digitalisation has the potential to increase the efficiency, safety, security and environmental performance both in the port as well as in the whole transport and logistics chain. A more efficient supply chain brings significant gains for ports, who function as multimodal nodes, where maritime, road, barge and rail transport converge. Port managing bodies can in this respect **support and help to facilitate the ongoing digitalisation process, as they are often a neutral matchmaker** between all parties involved in port operations, the ship-port interaction and hinterland connectivity. They can help to create data hubs and provide interconnectivity and digital services to stakeholders in the transport and logistic chain.

The COVID-19 crisis has given a **boost to the digital transition in transport and logistics**. It has showed that digitalisation can also be seen as an important tool in managing the health crisis. Digital technologies have enabled many workers in the transport and logistics sector to continue to perform their jobs, while reducing the need to have close contact between them. Moreover, the social distancing measures have required quick solutions for **contactless interaction** in the transport and logistics chain. The short-term accelerated transition to **paperless operations** must be further consolidated. For maritime passenger transport, resilient recovery measures will be based on co-existence with pandemic threats. It will require policy makers to properly assess the short-term measures and prepare for a sustainable, responsible but workable longer-term strategy.

In order to fully exploit the potential of digital technologies, many ports are developing their traditional **Port Community Systems (PCS)** into data sharing platforms. The larger and advanced PCS's are more than just portals; they facilitate from a neutral position data exchange between all port stakeholders (both public and private) and make use of state-of-the-art technology. European policy should continue to support PCS's, which can play a pivotal role in enhancing the digitalisation of the transport and logistics chain, as they can become data hubs where all stakeholders can bring together data, allowing a more efficient and secure logistics chain and connecting industry. Furthermore, ports are also increasingly building up their 'digital twins', which give them a dynamic virtual representation of the port. A 'digital twin' allows ports to optimise operations in the port as well as its connections to the hinterland, while at the same time, due to its efficiency gains, contributing to reducing CO2 emissions in the transport and logistics chain.

However, in order to fully exploit the potential of the digital transition in ports, **proper digital infrastructure and data transmission capabilities have to become available** such as high-capacity broadband, WIFI and 5G. It will be important to keep the smaller ports on board in the digital transition. This will require adequate investments allowing these ports to be step by step ready for a digital future.

The growing dependence on **digital solutions and data-driven operations must go hand in hand with a cybersecurity and -resilience framework**. Developing a policy that protects business continuity and mitigates the risks of cyber-attacks, without curtailing the rapid pace of digital innovation, must be seen as one of the major objectives.

Substantial investments in cybersecurity infrastructure will be needed. In this context, ESPO believes that the transport envelope of the Connecting Europe Facility, both the modernisation pillar (actions relating to smart, interoperable, sustainable, multimodal, inclusive, accessible, safe and secure mobility), as well as the military mobility pillar, should be used to enhance the resilience of Europe's port infrastructure to cybersecurity threats.

12. Policy coherence & synergies

ESPO stresses the importance of coherence between European transport infrastructure policy and European transport policy. Both the **timing and contents of the Alternative Fuels Infrastructure Directive, FuelEU Maritime and TEN-T need to be closely linked**. Being at the crossroads of supply chains, hubs of energy, industry and blue economy, **maritime ports are at the centre of different strategies and rely on coherent policies for the different sectors**.

European ports can play a positive role in the decarbonisation of the EU economy beyond the port area. Ports are producers, suppliers and facilitators of clean energy solutions. As such, they support and require **close synergies between TEN-T and TEN-E in particular**, but more broadly coherence and synergies between European transport, energy and environmental policy.