Dear Mrs Siclari,

I am writing to you regarding the consultation document on the EIB transport lending policy.

I believe it is important that the EIB updates its policy by integrating the principle of co-modality. It is specially concerning that one of the "guiding principles" of the current lending policy of EIB is based on the following:

"Funding railways, inland waterways and maritime projects (in particular Motorways of the Sea) will continue to be a priority as these are intrinsically the most promising in terms of reducing greenhouse gas emissions per transport unit. The same applies to urban transport and inter-modal hubs."


EIB has to avoid addressing its lending policy on the basis of "modes of transport" but on the basis of "efficient transport" and should not base its policy on the assumption that some modes of transport would be, by definition, more environmental friendly than others and should therefore be given preeminence over the others. Prioritising non-road projects because they are generally perceived as more environmentally friendly than other 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 flows. In freight transport for instance, to a great extent the environmental performance of one mode against other depends on the utilization of its maximum capacity, which depends on the volume and the weight of transported goods, the need for loading and unloading, the density of its network, source of energy, energy need loaded compared with unloaded and specific needs with respect to the commodity to be transported.

I am attaching a recent study on this topic PE International, that may be helpful for you.

I remain at your disposal for any further information that you may require.

With kind regards,

Fuensanta Martinez Sans
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