

Position Paper

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Revision of TEN-T Regulation 1315/2013- ensuring the core network

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Summary

CER welcomes the opportunity to contribute to the evaluation of the Regulation 1315/2013 on Union guidelines for the development of the trans-European transport network. TEN-T is an essential tool for the development of multimodal, green and efficient mobility in Europe and for enabling rail to unleash its full potential against the background of the European Green Deal ambitious climate targets, including the overarching goal of the European Green Deal transport-related measures which is to achieve a 90% reduction in transport emissions by 2050 to achieve climate neutrality.

With this Position Paper CER wishes to make the following statements:

- The core network criteria (e.g. 740m train length, ERTMS, electrification, 100 km/h speed, 22.5 tons axle load) should not be softened, as they are the enabler of achieving interoperability and a truly Single European Railway Area. On the contrary, their definition should be specified and interpreted to create a common understanding (same procedures and approaches) on the entire core network.
- The loading gauge is currently not included in the TEN-T Regulation. A harmonised loading gauge, where it is economically viable and technically possible, is important to promote the interoperability of rail according to the needs of the market, and in line with TSI INF requirements.
- It is crucial to complete the TEN-T Core Network by 2030, by ensuring the removal of bottlenecks, completion of missing links and cross-border projects as well as optimization of interconnection and interoperability of national networks
- The link between the Core Network Corridors (CNCs) in Regulation 1315/2013 and Regulation 913 /2010 has to be taken into account in the revision with respect to different TEN-T and RFC roles and competences. Provisions should be included in the new TEN-T Regulation, enabling the RFCs to provide input into the development of the CNC work plans.
- Urban nodes are not sufficiently integrated in the current TEN-T Network. Rail is still missing a significant number of important last mile infrastructure and multimodal connections for freight and passengers. TEN-T Regulation needs to address these issues by ensuring sufficient intermodal hubs and access points.
- Even though implementation of the TEN-T Network should be done gradually and the core network should constitute the backbone of the development of a sustainable multimodal transport network and should stimulate the development of the entire comprehensive network, it is important to sufficiently fund also the part of the comprehensive network not covered by the core network in order to avoid growing disparities.

- Sufficient CEF funds are needed to complete the TEN-T network, including the finalisation of major on-going TEN-T projects, and to support the digital transformation of rail operations, especially ERTMS on board and on track.

1. Introduction

Member States must do more to ensure completion of the rail component of the TEN-T core network by 2030 and the comprehensive network by 2050. This is not just a legal obligation upon them, but also a critical enabler of shifting more goods and people to climate-friendly transport by rail.

Transport infrastructure policy at EU level is a vital instrument for the promotion of important transport projects, the overall development of cross-border and regional infrastructure as well as cohesion and social inclusion. The TEN-T Regulation enables a network approach and should enhance connectivity, simplicity and interoperability at borders while providing a true EU added value. The Trans-European Transport Network (TEN-T) is an essential structure for the development of multimodal, green and efficient mobility across European borders and beyond. The TEN-T structure permits to better recognize missing links and capacity bottlenecks to be eliminated, to enable rail to unleash its full potential being the greenest and safest mode of transport.

CER welcomes the current evaluation and revision of the Regulation 1315/2013 on Union guidelines for the development of the trans-European transport network (hereinafter: TEN-T Regulation). In view of the European Green Deal's ambitious climate targets, the TEN-T policy is needed to ensure modal shift thus achieving a 90% reduction in transport emissions by 2050. TEN-T policy should support modal shift from air connections to a European high speed railway network.

With this Position Paper, CER wishes to present its position on the current TEN-T Regulation, highlighting the main concerns and expectations for the European railways.

2. Technical Specifications

For rail, the improvements of the technical specifications lie at the heart of the transport policy. In addition to being compliant to the Technical Specifications for Interoperability for Infrastructure (TSI INF)¹, the rail infrastructure in the comprehensive network must be fully electrified and equipped with ERTMS by 2050 being in line with the relevant Technical specifications for Energy (TSI ENE) and Command, Control and Signalling (TSI CCS). The core network requires a nominal track gauge of 1435 mm, and freight lines must be equipped to allow the running of trains with 22.5 t axle load, 100km/h speed and 740m length by 31 December 2030.

Moreover, the loading gauge is currently not included in the TEN-T Regulation. A harmonised loading gauge, where it is economically viable and technically possible, is important to promote the interoperability of rail according to the needs of the market. These provisions should be in line with TSI INF requirements.

It is crucial that the core network criteria (e.g. 740m train length, ERTMS, electrification, 100 km/h speed, 22.5 tons axle load) are not softened, as they are the enabler of achieving interoperability and a truly Single European Railway Area. On the contrary,

¹ (see [INF TSI](#))

their definition should be specified and interpreted to create a common understanding (same procedures and approaches) on the entire core network.

However, experience has shown that there are challenges in implementing these criteria. According to the Court of Auditor's report², deployment of ERTMS so far is slow and represents a patchwork. Many of the infrastructure characteristics defined in the TEN-T Regulation for all transport modes have not been properly achieved. For example, the technical requirements of the core network for rail, such as full electrification and 740 m trains, are unlikely to be implemented by 2030 as foreseen. In addition, the transition of the technical standards of the current Regulation is rather slow, and as a result rail is far from being fully interoperable, thus limiting the modal shift. The technical obligations for the core network will be challenging to be reached in 2030 (train length, electrification, ERTMS). The EU budget needs to be designed to undergird the obligations of the regulation.

Finally, the revision of the TEN-T Regulation should include a provision encouraging Member States to support the infrastructure upgrading which allows running trains with a loading gauge for the carriage of 4m trailers, with a length of 740 meters and 22.5 tons axle load throughout the Core TEN-T network. (Based however on the customer needs and following a thorough case-by-case analysis demonstrating a positive business case).

3. Bottlenecks, cross-border and missing links

Even though the TEN-T Regulation addresses in theory challenges such as removing bottlenecks, completing missing links and optimizing interconnection and interoperability of national networks, in practice, a lot has already been done but still not enough to tackle these issues. Adequate efforts are needed for the timely completion of the TEN-T core network by 2030 in particular for cross-border projects and their access routes.

It is crucial to include important missing infrastructure routes and cross-border connections in the TEN-T core network during the revision of Regulation 1315/2013. (For instance the newly established Rail Freight Corridors).

4. Interconnection and interoperability of national transport networks

An increased area of focus for the revised Regulation should be on the necessity to improve and simplify the interconnection and the interoperability of national transport networks at their interfaces (political borders as well as interfaces between different infrastructure managers) in order to increase the efficiency of cross-border (or "cross-interface") transports by removing technical and administrative barriers.

Specific funds should be made available for this purpose to adapt the technical infrastructural interfaces, to realize digitalized exchange of data, to harmonize operational rules and requirements to human operational resources or to introduce

² Special report no 13/2017: A single European rail traffic management system: will the political choice ever become reality?

technological tools to bridge the gaps where the harmonization is not economically achievable.

5. Coherence

The TEN-T Regulation must be coherent with other relevant EU policies. For instance, there should be coherence between TEN-T Regulation and Regional development and cohesion policy. In addition, TEN-T projects should be coherent in promoting accessibility for all users and therefore support implementing existing EU rules on transport infrastructure accessibility, such as Regulation 1300/2014 (TSI PRM) for the rail sector.

The link between the Core Network Corridors (CNCs) in Regulation 1315/2013 and Regulation 913 /2010 has to be taken into account in the revision with respect to different TEN-T and RFC roles and competences. The RFCs form the rail freight backbone of the TEN-T network. Their geographical alignments reflect market needs for rail freight. Therefore the alignments are partly different from the alignments of TEN-T-corridors.

Provisions should be included in the new TEN-T Regulation, enabling the RFCs to provide input into the development of the CNC work plan, including their investment needs for all core lines and core terminals designated to a RFC. Provisions concerning the relation between RFCs and CNCs should not undermine the CNCs' main responsibility for drafting the investment plans, and should in no way infringe on the roles and competencies of the RFCs.

CNC work plans define the projects to be realised and also should contain general provisions about the dimensioning and planning of infrastructure according to the market needs of the sectors.

6. Core Network nodes and routes

The Regulation has been effective in identifying and defining the most strategic nodes, including nodes connected with multimodal links. However, urban nodes are not sufficiently integrated in the current TEN-T Network. Rail is still missing a significant number of important last mile infrastructure and multimodal connections for freight and passengers. This is especially the case for rail freight where the origin and destination are rarely found on the core network. The TEN-T Regulation needs to address these issues by ensuring sufficient intermodal hubs and access points to conventional rail freight on corridors to allow long-distance transport via the most efficient mode. European urban nodes should be interconnected in a sustainable way. To this aim, it should be further considered how TEN-T can give a relevant contribution to urban mobility through infrastructure projects to address missing links and bottlenecks and deployment of concepts to increase intermodality.

Another challenge is that in high density nodes, there is not enough capacity available for rail. The subject of nodes is essential and yet seems secondary today, both in terms of TEN-T objectives and in the allocated budget. Furthermore, it should be necessary to:

- Define the concept: the term node should be better defined and better take into account all the components (quality, capacity, robustness, and performance,

intermodality), for both passenger and freight traffic. It should be also necessary to define freight terminals and logistic platforms.

- Allocate sufficient budget for rail urban nodes.
- Check the list of the rail urban nodes of the core network and assess whether it should be expanded.

There is also an urgent need to improve the competitiveness of medium-distance passenger rail compared to aviation as a viable alternative for short-haul flights. To reduce the air transport emissions, the TEN-T Regulation must therefore promote climate-friendly alternatives like rail and the creation of a European high-speed network that is interoperable, linking European capitals and major cities, connecting urban nodes and airports and supporting the development of an international passenger service market.

7. Network Planning

The TEN-T Regulation introduced a number of important changes to the European transport policy such as a move away from a patchwork to a network approach through the core network corridors as an implementation tools, and a two-layer network structure consisting of a core and comprehensive network.

Member States should aim to ensure completion of the core network by 2030 and the comprehensive network by 2050. To realise the completion of the TEN-T Network, it is essential to provide sufficient financial means for projects along the TEN-T Corridors. The budget allocated to the completion of the TEN-T network is lagging behind the actual need in terms of funding.

Currently, there is lack of complementarity between the TEN-T core network and the rest of the comprehensive network. So far the implementation measures have focused almost exclusively on the core network and only in a weakened form on the rest of the comprehensive network. Consequently, there is a growing disparity between the two networks, especially in terms of interoperability standards required in *Regulation (EU) No 1315/2013*. Even though implementation of the TEN-T Network should be done gradually and the core network should constitute the backbone of the development of a sustainable multimodal transport network and should stimulate the development of the entire comprehensive network, it is important to sufficiently fund also the part of the comprehensive network not covered by the core network in order to avoid growing disparities and to strengthen the resilience of the overall TEN-T network, which is of particular importance for rail freight.

The focus of policies at European and Member State level should not only be on new and expansion projects, with the target to ensure enough capacity for the current transport demand as well as to trigger additional transport demand in future. It should also focus on the modernisation and enhancement of the current network, since the existing infrastructure in many EU member states is in very poor condition. Expansion or new construction projects can only be effective with a well maintained existing network which ensures quality of services, predictability of TCR/construction works and well-functioning border crossings.

It is important to speed up the completion of the TEN-T Network in order to comply with the deadlines outlined in the TEN-T Regulation, without applying additional financial and bureaucratic costs for the sector. Therefore, Member States should be incentivized to speed up the permitting and construction processes of rail infrastructure projects in order to ensure timely implementation of infrastructure projects along the TEN-T Corridors.

8. Financing

One of the key challenges to expand further capacity and interoperability is an efficient, harmonised and synchronized rollout of ERTMS/ETCS and related operational rules across Europe.

- For rail, the Connecting Europe Facility (CEF) is the key financing instrument for bridging missing links and removing bottlenecks on the TEN-T Core Network Corridors, thus increasing the competitiveness and market share of the European rail system. CEF funds are needed to complete the TEN-T network (or extend it when justified by market needs), including the finalisation of major on-going TEN-T projects, and to support the digital transformation of rail operations, especially ERTMS on board and on track.
- The CEF II (2021-2027) must reflect actual needs of railway infrastructure in a realistic way: an increased EU-funding will be necessary for the network-wide ETCS implementation. Especially for the ETCS-equipment of the rolling stock an increased funding scheme is needed to ensure an efficient rollout of ETCS. Within the regulations of EU-funding schemes, more flexibility is needed e.g. less restrictive time frames for usage of funds. This would allow a more efficient and result-oriented allocation of funds.
- With ETCS technology, functions of the control and safety technology, which are still fulfilled by the infrastructure today, are migrating into the rail vehicles. Since the modernization of the infrastructure and the modernization of the vehicles are mutually dependent, incentives for vehicle retrofitting are an instrument for making the advantages of the ETCS infrastructure available more quickly.
- Sufficient funding from CEF Digital is crucial to support 5G connectivity for FRMCS along the Core Network Corridors. Furthermore, it is crucial to secure sufficient EU-wide harmonised spectrum for the Future Railway Mobile Communication System (FRMCS), which is critical for rail operation with ETCS and for the further digitalization and automation of rail operation with strongly increased connectivity needs. Furthermore, the EU needs to enable and foster harmonized migration paths to FRMCS. With regard to this, CER asks the decision-makers to prioritise the implementation of uninterrupted 5G coverage for FRMCS by the responsible IMs on the core network corridors, for applications in areas such as remote monitoring of railway assets, passenger security, automated railway operations or digital and automated freight.

Additionally, investing in regional rail transport is equally important to support the complementarity of main corridors with secondary rail lines and therefore the Cohesion Fund is of great significance for the development of TEN-T.

An overview of rail investments' wider socio-economic benefits is provided in this CER [factsheet](#).

CER would also like to stress that the CEF 2021-2027 must be correlated with the future TEN-T revision taking into account possible geographical changes on TEN-T Network and shall reserve funds for these changes.

EU governments and the EU should now recommit to robust public investment into TEN-T (deployment of ERTMS, electrification etc.) so that building firms and rail infrastructure suppliers know that despite the crisis of the COVID-19 outbreak, they can maintain – or even increase – capacity. Rail can and must play a key role in the recovery of the European economy after COVID-19, enabling at the same time to maintain and achieve ambitious climate policy objectives of the New Green Deal.

About CER

The Community of European Railway and Infrastructure Companies (CER) brings together railway undertakings, their national associations as well as infrastructure managers and vehicle leasing companies. The membership is made up of long-established bodies, new entrants and both private and public enterprises, representing 71% of the rail network length, 76% of the rail freight business and about 92% of rail passenger operations in EU, EFTA and EU accession countries. CER represents the interests of its members towards EU policy makers and transport stakeholders, advocating rail as the backbone of a competitive and sustainable transport system in Europe. For more information, visit www.cer.be or follow [@CER_railways](https://twitter.com/CER_railways) on Twitter.

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