



Brussels, 30 November 2022

President of the EU Council of Ministers for Transport, Mr Martin Kupka

EU Ministers responsible for Transport

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Minister Leonore GEWESSLER,
Minister Eamon RYAN
Minister Georges GILKINET
Minister François BAUSCH
Minister Clément BEAUNE
Minister Kostas ACHILLEA KARAMANLIS
Minister Aaron FARRUGIA
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Minister Trine BRAMSEN
Minister Yiannis KAROUSOS,
Minister Raquel SÁNCHEZ JIMÉNEZ

CC: Commissioner for Transport Adina Vălean

Open letter of European rail associations to European Transport Ministers ahead of the Transport Council of the 5 December

European Transport Ministers will gather on 5 December for their EU Council meeting. On this occasion they will discuss *inter alia* the current proposal for a revision of the TEN-T Guidelines Regulation, with the possibility of reaching an agreement on a Council General Approach.

European rail and public transport stakeholders are following developments on the matter with great attention and are concerned that the good ambitions of the Commission will be lowered by an agreement within the Council that, on the one hand maintains the fundamental structure of the proposal and, on the other, risks to provide too frequently for the possibility of uncoordinated flexibility and diverging national exemptions.

The right balance must be struck between the necessity of a harmonised upgrading of lines and the reasonable application of a socio-economic cost-benefit approach. Although it is understandable that in certain limited cases Member States may prefer to have the possibility to diverge from continental standards when these require investments with low or even negative returns, it nonetheless remains true that the objective of providing for a fully interoperable EU-wide rail network remains paramount.

We wish to reiterate that the revision of the TEN-T network and standards must, by all means, enable railways to act as the backbone of European mobility (meaning both the movement of people and freight), increase infrastructure capacity by building better physical infrastructure and deploy the necessary technology for an ever more digitalised infrastructure capacity management. This will be needed to increase the quality of rail services in both the passenger and freight market, foster modal shift and contribute to the decarbonisation of EU mobility on a continental scale.

Our associations jointly underline the following points to national Ministers:

- i) Regarding **ERTMS** deployment, the Council appears to be setting 2050 as a new deadline for the comprehensive network, and only where it is deemed necessary by the Member State concerned. This deadline will further delay the possibility to count on a fully interoperable rail infrastructure, but the wording also makes the deadline considerably less binding. On the contrary a clear path must be designed towards full ERTMS deployment in the shorter term – i.e. by 2030 for the core and 2040 for the non-core network respectively.
- ii) Ensuring rail infrastructure allows the transport of **4m-high containers and semitrailers** is vital for rail freight as they represent the new standards for which the infrastructure requirements must adapt to **P/C 400**. If one wants to address market needs and boost intermodal transport, such requirement should apply to intermodal transport and to at least a predefined list of international rail freight routes of the TEN-T core network (the Rail Freight Corridors or a substantial subset thereof) including their most important rerouting lines and connecting lines to/from transshipment terminals, to be agreed by Member States based on consultation with the rail sector. The Council seems however to prefer an approach that limits too much the need for respecting the P/C 400 profile, endangering the possibility to transport modern containers and semi-trailers and to boost rail freight and intermodal transport.
- iii) We hope that the Council will maintain the orientation of the legislative proposal with regard to the inclusion of important missing infrastructure routes and cross-

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border connections in the TEN-T core network, and the identification of additional **multimodal freight terminals as well as new urban nodes**. Particularly regarding urban nodes and the airports located in the core network, the establishment of rail passenger connections should be prioritised in order to provide efficient and environmentally friendly links for passengers. We are confident that the Council will recognize the importance of connecting **inland and maritime ports** to rail infrastructure on the core and comprehensive network by 2030 and 2050, respectively.

- iv) It is crucial to ensure that an appropriate amount of **alternative fuels infrastructure** will be deployed in the TEN-T network segments where electrification is not possible or for which could be granted a derogation for the electrification requirement according to TEN-T relevant provisions. Therefore, the Alternative Fuels Infrastructure Regulation should be fully aligned with the TEN-T Regulation in order to maximize its impact.
- v) Furthermore, the text does not sufficiently address **high-speed** rail infrastructure. While it does recognise the importance of connecting at higher speed European capitals and major cities, it does not provide the clarity the sector needs in this respect. If continental rail travel is to become a suitable alternative to aviation and contribute more specifically to the replacement of short-haul flights, then Ministers should understand the political importance of setting with the revised TEN-T Guidelines Regulation a path that will lead us towards the construction of an EU-wide high-speed rail network.
- vi) We would also like to take this opportunity to stress that the upcoming **mid-term revision of the Multiannual Financial Framework** must be executed in a way that is consistent with the revision of TEN-T maps standards. In this sense, reinforcing the existing budget of the Connecting Europe Facility should be prioritised. In fact, in case this consistency were not provided for, the scarcity of funds for obligatory investments would inevitably frustrate national governments, companies and citizens.

We look forward to a fruitful exchange on 5 December 2022.

Sincerely yours,

Alberto Mazzola, CER Executive Director

Conor Feighan, ERFA Secretary General

Gilles Peterhans, UIP Secretary General

Philippe Citroën, UNIFE Director General

Ralf-Charley Schultze, UIRR President

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CER

The Community of European Railway and Infrastructure Companies (CER) brings together around 70 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 79% of the rail network length, 77% of the rail freight business and about 90% of rail passenger operations in EU, EFTA and EU accession countries. CER represents the interests of its members towards EU policymakers and transport stakeholders, advocating rail as the backbone of a competitive and sustainable transport system in Europe. For more information, visit www.cer.be.

ERFA

ERFA is the European Association representing European private and independent railway companies. ERFA members share a commitment to work towards a non-discriminatory, competitive and innovative Single European Railway area. For more information, visit www.erfarail.eu.

UIP

UIP – International Union of Wagon Keepers - is the umbrella association of national associations from 14 European countries, thus representing more than 250 freight wagon keepers and Entities in Charge of Maintenance (ECMs). As the voice for more than 230'000 rail freight wagons which perform 50 % of the rail freight tons-kilometers throughout Europe, UIP represents half of the whole European wagon fleet and one of the most important resources for rail freight transportation in Europe. By means of participation in many working groups and committees at European and international level, the UIP brings the perspective and interests of wagon keepers to the table and works in cooperation with all interested parties to secure the future of rail freight transport in the long term. For more information, visit www.uiprail.org.

UNIFE

Based in Brussels since 1992, UNIFE is the association representing Europe's rail supply industry at the European Union and international levels. UNIFE's members include more than 100 companies – from SMEs to major industrial champions – active in the design, engineering and manufacture of rolling stock (i.e., trains, metros, trams, freight wagons) as well as rail signalling and infrastructure equipment. UNIFE also brings together the national rail supply industry associations of 11 European countries. For more information, visit www.unife.org.

UIRR

Founded in 1970, the International Union for Road-Rail Combined Transport (UIRR) represents the interests of European road-rail Combined Transport Operators and Transshipment Terminal Managers. Road-Rail Combined Transport (CT) is a system of freight forwarding which is based on efficiently and economically inserting electric rail into long-distance (road) transport-chains through the use of intermodal loading units (ILU). UIRR promotes zero-carbon door-to-door combined transport as the viable alternative for decarbonising freight transportation in Europe [www.ct4eu.eu]. For more information, visit www.uirr.com.