Position paper from the CPMR North Sea Commission in the Open Public Consultation accompanying the Impact assessment for the revision of the TEN-T Regulation (EU) 1315/2013

The CPMR North Sea Commission (NSC):

1. Welcomes the initiative of the European Commission to revise the TEN-T Guidelines

2. Agrees with the impact assessment that the TEN-T Regulation needs to more efficiently stimulate zero and low emission transport, be better prepared for the digital transition and that TEN-T infrastructure has to become more resilient in relation to climate change and civil protection (e.g. crises preparedness, accidents or other natural and man-made disasters)

3. Is convinced that decarbonisation of transport requires a comprehensive and holistic approach with a focus on promoting intermodality (modal shift), an EU-wide deployment of infrastructure and facilities for alternative fuels and making full use of the opportunities provided by digitalisation. Synergies between infrastructure policies for energy (including TEN-E), transport (TEN-T) and digital communications need to be strengthened to enable future decarbonisation and more sustainable transport.

4. Stresses that a shift to sustainable transport modes requires a focus on the development of seamless multimodal transport chains for passengers and goods, both for long-haul, and the first and last mile transport. Acknowledges that railway and water-based transport constitute high-capacity and spatially-efficient transport, with a potential to mitigate traffic congestion in urban areas and several forms of environmental costs from transport.

5. Believes that the revised TEN-T guidelines should facilitate coherent and continuous EU wide deployment of innovative transport solutions (intelligent transport systems etc) in order to use the resources of the transport network more efficiently. Further efforts should be taken to facilitate digitalisation of transport in terms of data sharing and digital connectivity.
6. Emphasises the importance of ensuring accessibility and connectivity to all regions – including peripheral and maritime regions and third countries like the UK, Norway and Russia. Calls for strengthened connections between the comprehensive and the core network. Furthermore, to introduce more inclusive governance of the core network corridors – whereby regions not located directly on core corridors are consulted. Also calls for more specific and committing plans with milestones for completing the comprehensive network by the defined deadline in 2050.

7. Takes note of the intention of the European Commission to extend a number of requirements from the core to the comprehensive network, but however believes that there is currently insufficient funding for that to be feasible.

8. Underlines that the establishment of physical cross border infrastructure in all modes should be a major focus for the TEN-T policy.

9. Calls for better alignment of EU and national transport planning and harmonisation of procedures for public procurement, permitting and environmental assessments in cross border projects to comply with the defined deadlines for completing the network in 2030 (core) and 2050 (comprehensive) respectively.

10. Believes that the revised guidelines should apply a broader set of goals contributing to the UN 2030 agenda and the Green Deal - beyond decarbonisation concerns. In particular reducing the environmental impacts of transport (e.g. air pollution, noise disturbance, congestion, sealing, and efficient land use) and focus more on delivering benefits to the users (e.g. better multimodal connectivity and timing).

11. Calls for strengthened ambitions for the maritime dimension of the network and suggests amendments in/less restrictive approach to the eligibility criteria for Motorways of the Sea (MoS) to better exploit the contribution of sea transport to decarbonisation, reduced congestion and improved accessibility. This would mean to:

   • Revisiting the criteria for MoS projects by removal of current limitations criteria for MoS projects with regard to involvement of at least one core port and allowing for intra-national connections.
   • Consider land legs from ports to TEN-T networks and destinations connecting regions across sea basins as part of the MoS in the European Maritime Space
   • Include third countries in the MoS network and make support available to the EU ports in any MOS proposal with third countries.
   • Mark MoS routes on the TEN-T maps.

12. Favours the policy option of combing elements from the three alternative focus areas listed in section E of the questionnaire as the different elements are complementary and mutually reinforcing. The NSC would thus like to continue major emphasis on a “traditional” infrastructure development concept” as a necessary condition (area 1), in combination with strengthened requirements for quality and resilience (area 2), supported by boosted digitalisation and innovation (area 3).
13. Highlights the need to perform certain adjustments in the design of the future TEN-T network to further strengthen accessibility for all regions and cross border mobility – as well as to take account of changing transport flows within the EU and with neighbouring/3rd countries. The proposed adjustments are further specified and justified in an annex to this position paper.

About the North Sea Commission

The North Sea Commission is one of the six geographical commissions of the Conference of Peripheral Maritime Regions (CPMR). Our mission is to strengthen partnerships between regional authorities which face the challenges and opportunities presented by the North Sea. The North Sea Commission is a politically-governed cooperation platform for 27 regions around the North Sea in Belgium, Denmark, Germany, the Netherlands, Norway, Sweden and the United Kingdom.

Link to homepage: https://cpmr-northsea.org/

Through dialogue and formal partnerships we seek to promote common interests, especially in relation to European Union institutions, national governments and other organisations dealing with issues that are relevant to the North Sea.
ANNEX to Position paper from the CPMR North Sea Commission in the Open Public Consultation accompanying the Impact assessment for the revision of the TEN-T Regulation (EU) 1315/2013
- Proposed adjustments to the design of the future TEN-T network

1. **Amendment proposed:**
Upgrade RailroadTerminal in Padborg (DK) - to be upgraded to the Core network

**Short justification to this amendment:**

The RailroadTerminal in Padborg (just north of the Danish-German border) is already on the Comprehensive Network, it is active and is one of the most important RRTs in Denmark.

The RailroadTerminal in Padborg has been upgraded several times over the past decades (2012 and in 2015), and after the last upgrade the RailroadTerminal in Padborg now has an annual capacity of 170,000 TEU. From 2009 to 2017 the number of container handled at the RailroadTerminal in Padborg went from 12,000 to 70,000 TEU per year. Over the same number of years the RailroadTerminal in Padborg has grown to handle approx. the same amount of cargo as the Core network Railroad Terminal in Taulov, and approaching the one in Høje Taastrup in amount handled.

This proposal is a good example of where the TEN-T must keep pace with developments.

2. **Amendment proposed: Oslo-Stockholm**
Add High speed railways to be upgraded or new sections SE/NO on a route Stockholm - Oslo

- In Sweden High speed rail route on upgraded/ new sections linking Stockholm to Oslo via direct route Västerås-Örebro-Karlstad
- SE/NO existing & new high speed rail line in Norway to connect the Stockholm/Oslo proposed route from the SE/NO border with existing lines into Oslo

**Short justification to this amendment:**

The justification is the importance of including the northern leg of the Nordic Triangle between Stockholm and Oslo connecting the two urban nodes. Efficient use of existing infrastructure is one of the cornerstones of the TEN-T objectives. By shifting flows between Oslo and Stockholm from air to rail transport, the upgrading will significantly reduce travel times and have a positive climate impact and improve study and labour markets along the route.

High speed rail route on upgraded/ new sections linking Stockholm to Oslo via direct route Västerås-Örebro-Karlstad. This project connects lengths of existing core railway with some sections of new build and the combined infrastructure then just exceeds the threshold for high speed rail in a most cost efficient way. The aim is to get the cross border element coordinated by a corridor coordinator (eg: as part of the Scan-med) but first in order to do that we propose to have all of the individual elements of the project to be included as part of the TEN-T. For this project it is the co-ordination of the railway networks that is the most important rather than the funding.

Specific rail route sections are:
- Stockholm to Örebro via Västerås – current rail line to be added to the TEN-T and upgraded
- Örebro-Karlstad – new section of route to be constructed between Örebro-Kristinehamn and included in TEN-T – Kristinehamn to Karlstad existing Core rail network to be upgraded.
- Karlstad to Norwegian border via Arvika - Karlstad to Arvika existing Core rail network to be upgraded. Thereafter new section of route to be constructed to the Norwegian border and included in TEN-T
- In Norway a new section of line to be constructed and included in the TEN-T to connect the above section and link to the existing lines running into Oslo.

3- **Amendment proposed:**

Add Cross border section of Railway from Emmen (NL) to Rheine (DE) to be included in the comprehensive network

**Short justification to this amendment:**

The cross-border railway connection between Emmen and Rheine connects rural areas to European rail connections and high-speed lines. The rail connection is a sustainable and fast alternative to passenger cars and the existing bus connection. In addition to a socio-economic and social strengthening of the border region, the rail connection also provides new possibilities for the transport of goods across national borders, through the direct connection at Bad Bentheim to the North Sea - Baltic Corridor. This connection contributes to a better hinterland connection for the ports of Rotterdam and Amsterdam to Germany and Scandinavia and helps to tackle negative economic, environmental and health consequences of congestion in heavily populated areas in the Netherlands and Germany. In addition, the Emmen-Rheine connection stimulates railway travel as a sustainable alternative to air travel for both goods and passengers. Both freight and passenger transport in this cross-border region have increased over the past years. This connection will also contribute to the resilience of the TEN-T network. For these reasons we believe this connection should be part of the TEN-T Comprehensive network.

4- **Amendment proposed:**

Add DK/NO Motorway of the Seas (MoS) links Hirtshals (DK) to Kristiansand & Larvik/ Grenland (NO)

**Short justification to this amendment:**

Two sealinks are proposed for the North Sea Basin as example additions. Currently no sealinks are shown on the existing TEN-T maps for the North Sea at all outwith the Core Corridors but given the success of the TEN-T maps in representing the European network at all policy levels it would be remiss to continue excluding sealinks.

NSC have advocated that sealinks should be shown on the map at least for intra-European flows ro-ro/lo-lo/sss etc (i.e. excluding only intercontinental routes to areas outside of the European sea basins) these links should include the links in and between member states as well as to third countries.

The Jutland corridor connects Denmark and the European continent with the western, southern, and south-eastern part of Norway via the ports of Larvik, Grenland and Kristiansand. The road and rail links in Denmark to the ports of Hirtshals and Fredrikshavn will be part of the TEN-T core network (Scan Med) once the CEF2 regulation is adopted. Inclusion in the TEN-T of the MoS system in these regions will give the connections due priority and visibility in terms of upgrades and last mile links for transport between rail and sea. Thus the maritime links between Hirtshals, Larvik, Grenland/Langesund and Kristiansand should be included in the TEN-T maps.
These two examples are an illustration associated with the Jutland corridor network development and making Norwegian connections. Other similar representations can be easily imagined.

5- Amendment proposed:

Include the railway and road sections between Central Scotland and Aberdeen (UK) into the Core network

Short justification to this amendment:

Upgrade road and rail infrastructure to Aberdeen along the current comprehensive network routes to Core in order to extend the core network from the most northerly existing points on this corridor a further (approx.) 200km north of the existing northern end which is near Glasgow/Edinburgh. The combined corridor would connect Local Authority areas with a total population of 1.42 million to the core network and end at the new port infrastructure being constructed in the energy industry hub of Aberdeen. The alignment extension would also thus connect to the Motorway of the Sea - Northern Maritime Corridor for the Norwegian and Russian Barents regions and Northern Scottish islands which was proposed by the Northern Maritime Corridor project to make landfall in Aberdeen for Scottish connections.

6- Amendment proposed:

Ports of Hanstholm and Skagen (DK) to be included in the comprehensive network

Short justification to this amendment:

While the TEN-T has had a focus on the strategic territorial importance of ports, we would highlight the importance also of ports that are mainly fishing ports, and their need for accessibility via hinterland roads and railways. These aspects are not currently recognised under the current criteria for eligibility under TEN-T. The following cases in North Denmark illustrate this point:

Danish ports of Hanstholm and Skagen to be included in the comprehensive network. These are cases where ports have a need for quick reliable efficient connection to the transport network in order to efficiently manage the European maritime resource - in this case fishing - and like for several others these two examples are some of Europe’s largest and most important fishing ports that do not achieve the eligibility criteria based on tonnes and therefore need some special attention.

The Port of Hanstholm is Denmark's leading port for edible fish and home to Denmark's largest fish auction which in 2018 handled fish at a value of 133 MEUR. Hanstholm is one of the most important locations on ‘the blue motorway’ to Europe, and the shipping route via Hanstholm is the shortest between the European markets and the ports of Norway, Iceland and the Faroe Islands. The road link to the German border is very important to ensure an uninterrupted cooling chain from the sea to the dining table.

The Port of Skagen is the biggest fishing port in Denmark and accounts for 25 per cent of the total landing value across all Danish ports. The Port has approx. 6,000 landings from fishing vessels with a total of 393,069 ton at a value of 123 MEUR. Skagen is located at one of the world’s busiest straits and an optimum location in relation to the fishing grounds in the North Sea, Skagerrak and Kattegat.

Other ports in the North Sea area and elsewhere in Europe may also rank as important in the context of the largest fish landing ports and yet still not reach the current threshold for a comprehensive port measured in tonnes. Other examples in the North Sea region include Peterhead and Fraserburgh (UK).