To whom it may concern

Comments to the draft OIR-report on the revision of the Trans-European Transport Network (TEN-T) guidelines

The North Sea Commission (NSC) transport group would like to put forward our views in relation to the revision of the Trans-European Transport Network (TEN-T) guidelines in general and the draft Own Initiative Report (OIR) on the TEN-T guidelines.

The NSC has a transport working group which is following the TEN-T policy closely. NSC member regions are represented in corridor forums related to the North Sea – mainly in the ScanMed and North Sea – Baltic forums. Many institutions from the member regions are partners to transport-related projects under the CEF, Interreg and Horizon 2020. The NSR is on overall well embedded in the TEN-T network and many sea ports, air ports and urban nodes are included in the core layer. However, not all parts of the NSR – in particular peripheral areas in the Northern and Western part of the region – are sufficiently integrated in the TEN-T network. These areas suffer from long distances to markets, with extended transport times, higher costs and fewer route options.

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 some 30 + regions around the North Sea in Belgium, Denmark, Germany, the Netherlands, Norway, Sweden and the United Kingdom.

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.

Comments and suggested amendments to the OIR

2. Considers it important to further develop the TEN-T to focus on the interconnection between the core and comprehensive networks in rural, peripheral and outermost regions and islands; stresses that no major changes to the maps should be made; calls on the Commission to take over all adjustments laid down in the revision of the Connecting Europe Facility (CEF)
Comments:

The NSC very much supports the call to take over all adjustments laid down in the revision of the Connecting Europe Facility (CEF) – including the proposal that the Scan Med corridor in Jutland, Denmark, should be prolonged from Taulov to the ports of Hirtshals and Frederikshavn.

To pave the ground for inclusion of the section Stockholm-Oslo in the ScanMed corridor in conjunction with the upcoming mid-term revision of the CEF, the NSC calls for additional sections of this route to be incorporated or upgraded in the Core TEN-T network in the context of the CEF-revision. This section was earlier part of the TEN-T’s Northern Triangle.

Today, there are major shortcomings in the infrastructure between Stockholm and Oslo. Two European capitals with a distance of just over 400 km. The train connection today has a travel time of about five hours and a very low market share with only 200,000 train journeys a year compared to 1.4 millions by air. In recent years, interest in the Oslo-Stockholm route has increased significantly and the potential and conditions for creating a railway connection that is competitive with aviation are very large. As the distance is relatively short, it would be entirely possible to have a travel time of less than three hours by increasing the capacity of existing infrastructure and constructing two new railway links. Efficient use of existing infrastructure is also one of the cornerstones of the objectives of TEN-T. By shifting flows between Stockholm and Oslo from air to rail transport, the upgrading will significantly reduce travel times and have a positive climate impact and also improve study and labor markets along the route.

Realisation of a new link in the Scan Med corridor mentioned above for the section Stockholm-Oslo would require some additional sections of route to be incorporated or upgraded in the Core TEN-T network, such as:

| Stockholm – Örebro (Mälarbanan) | Add to core network and include in CNC Scan-Med |

![Diagram of CPMR NSC proposed amendments to the TEN-T network](image-url)
In addition, in order to strengthen the interconnection between the core and comprehensive network, it is vital to support projects facilitating direct access to the core network. The European Commission (EC) is also requested to consider whether it would feasible to introduce a criterion – whereby no location on the comprehensive network should be more than a defined travelling time (for instance two hours) away from the nearest connection point at the core network.

We believe that the revision should also review the relevance of current planning methodologies and criteria for defining the different layers of the network.

Although no major changes should be made to the maps, we still believe that there is a case for adding new sections and upgrade the status of certain nodes.

The ports of Hanstholm and Skagen (Denmark) have no current status. They and similar ports, e.g. Peterhead (United Kingdom), should be included in the comprehensive network. These ports are mainly fishing ports and are very important for export to European markets and to the local and national economy. When the connecting road stretch (in this case Herning-Holstebro-Hanstholm) is already a part of the comprehensive network, then it also logical to include the Port of Hanstholm. In this location the Danish State has begun the process to expand the road from Frederikshavn to Skagen and there is also railway connection from Frederikshavn to Skagen. The reason why we separate out a particular port sector is that the fishing industry in particular is dependent on efficient, fast, and bottleneck-free access to the European transport network.

Upgrade of the RailRoadTerminal (RRT) in Padborg (Denmark) from the comprehensive to the core network. 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.

Not withstanding the unresolved aspects of Brexit on the TEN-T the link Glasgow & Edinburgh to Aberdeen should be upgraded to core status, and possibly also be considered as an extension to the North-sea Mediterranean Corridor in the context of future CEF reviews. Upgrade road and rail infrastructure to Aberdeen along the current comprehensive network routes is an extension of the North Sea-Mediterranean corridor alignment to extend the core network from the most northerly existing points on this corridor to just under 200km north of 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.

Paragraph 15. Emphasises the role that high-quality maritime links play in the EU's international and internal trade; considers that the purpose of the Motorways of the Sea pillar is to
facilitate needs-based short-sea links and services as sustainable complements to land transport, to facilitate the cooperation of maritime ports and their connection to their hinterland, and to promote the development and roll-out of clean and alternative fuels, subject to an impact assessment, and energy-efficiency solutions for maritime transport;

Comments:

The NSC believes that the draft report on the revision of TEN-T guidelines needs to enhance the ambition in terms of the maritime dimension of the TEN-T, especially paying attention to the eligibility criteria for ports to be included in the network and the maritime links in the maps. While we understand that the mapping of Motorway of the Seas (MoS)-system is a difficult and contentious issue we still believe that mapping of the traffics (routes and ports) and highlighting those that would be eligible and those that would not be eligible for support would be most helpful and illustrative.

The example we would like to highlight is the following: the proposal in the OIR of para 2 calling on the Commission to take over all adjustments laid down in the revision of the CEF would extend the Scan-Med corridor across Jutland with a northern end at the important port of Hirtshals in Denmark. This port at the northern end of the Core Road and Core Rail network routes will now be in the Scan Med corridor but the roro traffic links to Norway, whilst with frequent departures and high capacity ships, do not reach the threshold for Core port status at either end on their own (such status is most often determined by important intercontinental and large national traffic flows). Currently these ports and connections would not qualify for MoS support. Without mapping this maritime link between the port of Hirtshals and the relevant harbours in Norway and beyond, the disconnect is not immediately apparent to policy makers and others.

17. Highlights the strategic value for the EU of maintaining within the TEN-T close transport links with third countries and of further integrating the Western Balkans; considers it expedient to extend its TEN-T transport connections to candidate countries, the countries of the Southern Mediterranean and Eastern Partnership - including Norway and Russia, and to Asia, based on EU standards and the principle of reciprocity; calls on the Commission to pay special attention to the borders in Europe and to monitor the impact of the withdrawal of the UK on border regions;

Comments:

The NSC believes attention should be given in the TEN-T guidelines to ensuring connections from peripheral regions to third countries such as Norway, the United Kingdom and Russia.

Thank you for the opportunity to provide our comments to the draft report on the revision of TEN-T guidelines. We are at your disposal would you like to discuss the above.

Sincerely yours,
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