The North Sea Region (NSR) is one of the busiest and most intensively used seas in the world (with activities such as shipping, oil, gas, wind energy, fishing, aquaculture etc.). There is abundant export-based industry, and the economies are open to the world with considerable transport needs. Besides, there is a demand in the market for both efficient and green transport.

The NSR is a major transport hub in Europe and vital for the competitiveness and sustainable growth in the EU and neighbouring countries. There is a need for better connections between the urban and rural areas that make up the NSR, in order to support a balanced, polycentric spatial development.

The CPMR North Sea Commission (NSC) welcomes the proposal for a Regulation on guidelines for the development of the Trans-European transport network (TEN-T), and believes that the proposal contains many positive elements in line with our input to the consultation process. Nonetheless, the NSC believes that the following amendments should be made.

The NSC is pleased that the Jutland corridor (DK) has been included in the ScanMed corridor, as part of the adoption of CEF, which has been a long-held position of the NSC. Nonetheless, the NSC regrets that some of our proposals for amendments to the TEN-T maps which were submitted in the consultation process have not been included, and asks the Member States involved and the European Parliament to put forward the following amendments in the upcoming legislative process:

- Include the Oslo (NO) - Stockholm (SE) railway in the European Transport Corridor ScanMed
- Upgrade the Rail/Road Terminal in Padborg (DK) to the Core network
- Include the ports of Hanstholm and Skagen (DK) in the comprehensive network.
- Include the cross-border section of railway from Emmen (NL) to Rheine (DE) in the comprehensive network.
- Include the new railway line from Amsterdam to Groningen (NL) - Lelylijn – in the extended core network as a crucial part of the existing missing link in the TEN-T network between Amsterdam and Hamburg
- Consider adding urban nodes to the TEN-T maps for Norway in the process of updating the maps and in dialogue with the Norwegian Government

- The NSC supports the 2040 deadline for the implementation of the new extended core network, but stresses that this advanced deadline must be complemented by sufficient funding (recital 17).
- The objective of cohesion, in art. 4(b), needs to be clarified when it comes to fostering connectivity within the periphery of the EU by strengthening connections between population centres to facilitate more balanced regional development.
- There needs to be stronger funding commitments by the EU and Member States in order for the alignments of standards and requirements between the comprehensive and core networks to be realistic.
- The NSC calls for stronger obligations for cooperation with neighbouring countries, which should be reflected in art. 9. TEN-T should be ambitious in promoting interoperability with the transport networks of all neighbouring third countries (ex. Norway, UK).
- All relevant EU legislation, including TEN-T, should take the total environmental impact of fuel into account (art. 3). Impact should be based on a life cycle assessment covering all aspects, and not just the emissions generated when the fuel is used. There should be incentives for the deployment of biogas infrastructure for heavy duty transport throughout Europe in line with the minimum standards for LNG by 2025 in every Member State.
- Member States should also consult regions when developing action plans for a well-functioning multimodal freight terminal network in their territory, given their responsibility for regional development.
- Urban Nodes should receive support and guidance on how to reach the TEN-T targets, as well as EU funding to implement these measures (art. 39-41).
- The NSC believes that TEN-T (AFIR) should acknowledge the potential of Liquified Biogas from renewable sources such as waste, agricultural-, and forestry residues for decarbonising transport. Liquid Biogas should be referenced in Art. 44(b) alongside hydrogen and electricity supply systems.
- The European Coordinator should be required to consult the regions, and the wording in Art. 52.6 should reflect this. Furthermore, it is important to involve transport actors and regions in areas neighboring the European Transport Corridors in the corridor governance - particularly at endpoints, where the neighbouring region constitutes the natural continuation of the corridor (Art. 42.2)