



## The revision of TEN-T Regulation: comments

### KEY MESSAGES

A revision of the TEN-T Regulation should:

- Focus on **completion of missing links and improved interconnectivity, capacities and safety across all modes of transport**, which should include the objective of **enhancing the role of terminals** in the governance of the core network corridors.
- Benefit from potential **synergies with the frameworks for the Trans-European Telecommunications Network (eTEN) and for Energy (TEN-E)** where they serve the sustainable transport objectives.
- Promote a modern **infrastructure for alternative fuels for all modes of transport** while upholding the maintenance of key existing networks.
- Set **mandatory deployment targets for alternative fuels infrastructure in the TEN-T and beyond, maintaining the technological neutrality**.
- Foster physical infrastructure **enhancements which enable effective digital feeds and incentivise cooperative communication** across all modes of transport in order to speed up digitalisation.
- **Avoid bureaucratisation and administrative burdens** in the governance of TEN-T.

The Trans-European Transport Network is proving to be of fundamental importance in terms of safety and economic and environmental sustainability. Moreover, it must be considered as lifeline which must remain open and operational, enabling the efficient cross-border transport of goods and passengers also during crises periods.

The EU and Member States together must ensure that there is adequate funding and that these networks are connected, expanded, streamlined, upgraded and maintained to be fit for Europe's future transport needs: increased capacity, digital solutions, a shift to zero- and low-carbon mobility, safety.

The revision of the Regulation must build on the main pillars as outlined in the following.



### Priorities and financing

#### 1. Adapting infrastructure to the future mobility needs:

The upgrade and development of inter-operable cross-border physical and digital infrastructure elements for the sustainable connected and automated mobility are key.

The ambitious climate goals require a massive overhaul across all modes of transport, as all of them have the potential to contribute to those goals. Huge capacity increase of the rail freight network is necessary as well as greater and faster support for rail electrification. At the same time, the lasting importance and transport demands in all other modes of transport – especially the road freight transport which still accounts for the majority of transport performances (regardless of type of drive and/ or power source) and the waterway transport with efficient access to seaports - must be backed up by vast investment lines.

Considering the economic requirements, it is essential to:

- **Build the missing links and increase interconnectivity and capacities across all modes of transport.** The new alignment of the TEN-T regulation should further sharpen its focus in this regard and aid in enhancing the **role of terminals** in the governance of the core network corridors, too.

- The revised TEN-T Regulation should promote a **modern infrastructure for alternative fuels for all modes of transport** while upholding the maintenance of key existing networks. Decarbonised transport will be based on green renewable energy carriers. Appropriate charging and refuelling infrastructure in order to enable this steep ramp-up in clean mobility is required.

- For road transport, market uptake of latest vehicles technologies, including low- and zero emission vehicles, should be fostered by **setting mandatory deployment targets for alternative fuels infrastructure in the TEN-T and beyond**, not just for light-duty vehicles but also for heavy-duty vehicles and coaches.

- Terminals serve as nodes for four transport modes (maritime, rail, road and inland waterways) and fulfil an important role in providing multimodal transport solutions that make transport more efficient and cleaner. They have a good understanding regarding how local bottlenecks impede further integration of the transport system. **The role of terminals in the governance of the core network corridors should therefore be incentivised**, also in view of the advice they will be able to provide regarding modal integration.

- The alternative fuels infrastructure support measures should also specifically **consider the reality of seaport terminals** when introducing (binding) requirements for refuelling and recharging infrastructure. It is important that any infrastructure policy aiming for emission reductions departs from a technology neutral approach as the maritime sector's path to decarbonization is not yet set out. The regulatory framework should therefore be flexible to allow the incorporation of different (future) solutions and should refrain from binding requirements as much as possible.



The policy should incorporate a holistic supply chain approach that would include safety aspects, production, interoperability as well as the supply and demand side, and also ensuring infrastructure compatibility with innovative vehicles, vessels and aircrafts.

Infrastructure support policies should foster the **synergies between the Trans-European Networks for Transport (TEN-T), Trans-European Telecommunications Network (eTEN) and for Energy (TEN-E)** where they serve the sustainable transport objectives and the evolving connected and automated mobility needs of the transport sector and its users. It is essential to:

- **Ensure the harmonisation, quality and maintenance of the physical road infrastructure**, such as lane markings, road signs – especially temporary signs – **for vehicle sensors to detect and interpret**. Enriched digital feeds with available physical information will increase the performance of Connected and Automated Mobility systems<sup>1</sup> and also benefit human drivers, leading to better road safety.
- Besides the physical attributes of the road ecosystem and its digital representation, **incentivise co-operative communication** in this ecosystem which could add collective intelligence that benefits vehicle users and traffic managers. It could be achieved through networking between vehicles and the infrastructure, e.g. Vehicle-to-Infrastructure (V2I) and Infrastructure-to-Vehicle communications (I2V), which also requires **financial support for internal mode-specific IT systems**.

## 2. Urgent investment needs to fill in the existing investment gap:

It is imperative to address the **gaps in transport infrastructure that are today slowing the completion of the TEN-T network** and other transport infrastructure projects.

The territorial planning procedures have evolved since last publication of the TEN-T Regulation, which should be reflected in the revision. Some of the missing pieces of key corridors<sup>2</sup> or new bottlenecks should be covered.

In order to achieve one of the most important goals of the TEN-T network - to promote migration towards the European track gauge networks which ensure functioning of the single railway area - the **remaining isolated networks** should be urgently addressed by the Regulation.

The **road transport** requires sufficient **parking and rest areas** that are adapted to the needs of modern logistics in terms of capacity and safety, **including multi-modal terminals**. This infrastructure should provide for a safe and secure environment for drivers and their cargo. The latest EU rules, such as the Mobility Package I, are very demanding in terms of investment, and this should not be underestimated.

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<sup>1</sup> for instance, the availability of standardised information describing the road network infrastructure and any modifications to it that can be brought in High-Definition maps for a more accurate decision-making by either the driver or the automated system.

<sup>2</sup> For example, those of the Rail Baltica project route.



The current regulation provides rest areas on motorways approximately every 100 km. In the light of the European Commission's assessment<sup>3</sup>, this is an insufficient requirement. Taking into account the needs of society, market and environment, in order to provide road users and truck drivers with an adequate number of parking spaces and an adequate level of safety and security, the TEN-T Regulation should:

- set specific number of **parking spaces for heavy trucks** instead of the abstract "parking" requirement, considering the lack of parking spaces identified by the European Commission;
- include **refueling and recharging requirements, ensuring consistency with the Alternative Fuels Infrastructure regulation**;
- focus on **multi-modal terminals**;
- determine that safe parking lots must be built approximately **every 50 km of the core network**;
- introduce a requirement that the rest areas must have **appropriate infrastructure and services for drivers' rest**: hotels, catering, personal hygiene facilities;
- the revision of the TEN-T Regulation should address public infrastructure investments in the TEN-T network, related to **longer and heavier vehicle combinations – ecocombis – deployment** of which could contribute to the further greening of road transport and achieving the EU climate law targets;

The revision of the TEN-T Regulation should also take into consideration **new categories of investment** necessitated by the constantly evolving connections with third countries. **Border crossing points** as a category of infrastructure must appear on the network development plans. The inclusion of border crossing points in the TEN-T network is very relevant for two main reasons:

- As TEN-T connects the EU with third countries, smooth and safe border crossing is becoming critical (including the fight against smuggling and illegal migration).
- While the intra-EU border crossing points are less relevant as such, they are key in ensuring the resilience of transport services in times of crisis, as demonstrated during the COVID-19 pandemic. A quick and smooth (re-)activation of the EU Green Lanes protocol would be instrumental to deal with future health or other crises, and the crisis-invoked infrastructure bottlenecks at intra-EU borders should be reflected in the TEN-T revision.

### Delivering

Completion of the TEN-T on time with optimized geographic coverage must be the top objective: the **core network should be finalised by 2030 and the comprehensive network by 2050 or earlier**. Once fully complete, the network should connect European regions, improve interoperability, remove bottlenecks, streamline cross border transport, improve the connections between different transport modes, improve the overall capacity of Europe's transport network, and contribute to Europe's climate objectives.

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<sup>3</sup> <https://ec.europa.eu/transport/sites/default/files/2019-study-on-safe-and-secure-parking-places-for-trucks.pdf>



**Avoiding unnecessary bureaucracy and administrative hurdles** must be an absolute priority if our objectives are to be met. Good cooperation between the Commission and Member States in the field of funding applications and funding disbursement should be maintained and not destabilized. Thus, it must be ensured that processes are not complicated by too many additional requirements, including the new ones related to the climate objectives. In the worst case, bureaucratic delays can lead to the Connecting Europe Facility and other funds not being claimed and sustainable transport objectives not achieved.

Moreover, the TEN-T regulation should **not lose the focus or alter its major objectives**, which could weaken the strengths and potential of the instrument. The revision should ensure effectiveness of regulation and speed of delivery.

Last but not least, the revision should also provide for a **monitoring plan of maintenance of the existing infrastructure** at European level.