Position of the CPMR North Sea Commission on the proposal for a Regulation of the European Parliament and of the Council on Union guidelines for the development of the trans-European transport network, amending Regulation (EU) 2021/1153 and Regulation (EU) No 913/2010 and repealing Regulation (EU) 1315/2013

1. 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).

2. The NSC believes that the proposal contains many positive elements in line with our input to the consultation process – including:
   - That territorial accessibility has been defined as an objective for the whole network.
   - Stronger focus on enabling shift to sustainable transport modes like rail, inland waterways and short sea shipping.
   - Requirements for improved availability of alternative fuels and related infrastructure – including deployment of fast recharging points for light and heavy-duty vehicles.
   - Higher ambitions for maritime transport.
   - A less restrictive definition of urban nodes, allowing for a larger number of urban nodes in the TEN-T network and better integration of long-distance and regional transport.
   - Stronger synergies between infrastructure planning and the operation of transport services.
   - A strengthened service and user perspective, especially in relation to passenger transport.
   - Requirements for coherence of national transport and investment plans with the priorities set out in this Regulation and in the work plans of the European Coordinators.
   - Strengthened role of the European Coordinators
   - That the Jutland corridor up to the ports of Hirtshals and Frederikshavn was included in the European Transport Corridor ScanMed as part of the adoption of CEF, which is a long-held position of the North Sea Commission

The NSC believes that the following issues should be strengthened, further highlighted, clarified, modified, changed or added in relevant chapters of the draft proposal:

INTRODUCTION – recital (17)

3. Supports 2040 as a deadline for implementing the new concept of the extended core network that includes strategic sections of the comprehensive network, but stresses that the advancement of deadlines by ten years must be followed by sufficient funding.

CHAPTER I GENERAL PRINCIPLES [art.1 – 9]

4. NSC would like the objective on cohesion (article 4 b) to be clearer when it comes to the need of fostering connectivity within the periphery of the Union by strengthening connections between population centres to facilitate a more balanced, polycentric regional development in Europe.

5. Although in favour of aligning standards and requirements between the comprehensive and core networks in fields such as railway infrastructure, alternative fuels or urban nodes, the NSC believes that there is a need for stronger funding commitments on the part of the EU and member states for this to be realistic.

6. The NSC calls for a more ambitious approach and stronger obligations for cooperation with third neighbouring countries which should be reflected in art. 9. We believe that the TEN-T regulation should state an ambition to promote interoperability with the transport networks of all neighbouring third countries – including Norway and the UK. As a more general principle, we suggest that the maps in the annexes should indicate the natural continuation of European Transport Corridors into neighbouring third countries – as illustrated by our call to include MoS (now part of the European Maritime Space) links from Hirtshals (DK) to Kristiansand & Larvik/ Grenland (NO).

7. Considers that all relevant EU legislation, including TEN-T Regulation, should take into account the total environmental impact of a fuel, cf. art. 3 on Definitions (al) linking to the Alternative Fuels Infrastructure Regulation -AFIR. Impact should be based on a life cycle assessment covering all aspects, such as the extraction of raw materials, production and transport, and not just the emissions generated when the fuel is used. The AFIR and TEN-T should have incentives for the deployment of biogas (Liquified Biogas (LBG) infrastructure for heavy duty transport throughout Europe, in line with the minimum standards for LNG (minimum 400 km apart) by 2025 in every country.

CHAPTER III SPECIFIC PROVISIONS:

SECTION 6 INFRASTRUCTURE FOR MULTIMODAL FREIGHT TERMINALS [art.35 – 38]

8. The NSC believes that the member states should also consult the regions when developing action plans for a well-functioning multimodal freight terminal network in

their territory, cf. article 35 (3.-4.), as they have a comprehensive responsibility for regional development.

SECTION 7 URBAN NODES [art.39 - 41]

9. Considers that the urban nodes should receive support and guidance on how to reach the targets in the TEN-T and EU funding to help implementing the measures. The preconditions will vary between the urban nodes of various sizes and resources.

CHAPTER IV ADDITIONAL PROVISIONS - New technologies and innovation [art.44]

10. Believe that the TEN-T (AFIR) should also acknowledge the potential of Liquified Biogass (LBG) from renewable sources such as waste, agricultural- and forestry residues for decarbonising transport, in particular heavy duty road transport. A reference to LBG should be inserted in art. 44b alongside hydrogen and electricity supply systems.

CHAPTER V IMPLEMENTATION OF THE EUROPEAN TRANSPORT CORRIDORS AND OF THE HORIZONTAL PRIORITIES

11. Considers that the European Coordinator should be required to consult the regions and that the wording in article 52.6 should be amended accordingly.

12. Believes that it is important to also involve transport actors and regions in areas neighbouring the European Transport Corridors in the corridor governance – in particular at the endpoints, where the neighbouring region constitutes the natural continuation of the corridor (art. 52.2) - such as the corridor forums.

MAP ANNEXES:

13. The NSC regrets that our proposals for amendments to the TEN-T maps which were submitted in the consultation process have not been included, and requests the member states involved and the European Parliament to take into account the following amendments in the upcoming legislative process:

- To include the Oslo- Stockholm railway in the European Transport Corridor ScanMed
- Upgrade the Rail/RoadTerminal in Padborg (DK) to the Core network
- The ports of Hanstholm and Skagen (DK) to be included in the comprehensive network.
- The cross-border section of railway from Emmen (NL) to Rheine (DE) to be included in the comprehensive network.
- The new railway line from Amsterdam to Groningen (NL) – Lelylijn – to be included in the extended core network as a crucial part of the existing missing link in the TEN-T network between Amsterdam and Hamburg.
- Consider to add urban nodes to the TEN-T maps for Norway in the process of updating the maps and in dialogue with the Norwegian Government.

The amendments above are described, justified and mapped in an annex to this position.

About the North Sea Region (NSR)

The NSR territory is rich in natural resources, and the North Sea is s 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.

The NSR represents both urban and sparsely populated areas, and there is a need for better connections between such areas in order to support a balanced, polycentric spatial development.

In addition, the NSR hosts some of the most competitive and innovative countries in Europe, and several spearheading technology companies. To mention a few examples: the Hyperloop test-center in Groningen, the Netherlands, the autonomous, electric containership "Yara Birkeland" operating in port of Grenland, Norway, and the self-driving electric truck "Vera" of Volvo in the port of Gothenburg, Sweden.

About the CPMR North Sea Commission (NSC)

The NSC is one of the six geographical commissions of the CPMR - a politically-governed cooperation platform for 27 regions around the North Sea in Belgium, the Netherlands, Germany, Denmark, Norway, Sweden and the United Kingdom. The mission is to strengthen partnerships between regional authorities which face the challenges and opportunities presented by the North Sea. *Read more about the NSC here:* https://cpmr-northsea.org/who-we-are/ and see the member directory and map https://cpmr-northsea.org/who-we-are/member-directory-map/

Annex to NSC position to proposal for revised TEN-T regulation – amendments in maps

The NSC requests the member states involved and the European Parliament to take into account the following amendments in the upcoming legislative process:

- To include the Oslo- Stockholm railway in the European Transport Corridor ScanMed

Justification of this amendment

The railway connects two fast-growing capital regions only 400 km apart, where there is extensive traveling and economic exchange today. Since the train journey takes five hours or more, air travel is the dominating transport mode with a market share of almost 90 percent.

With improvements of existing infrastructure as well as construction of two new railway links, and a new cross-border railway between Sweden and Norway, the travel time by train could be reduced by almost two hours (to below 3 hours). We believe that a faster railway connection between Oslo-Stockholm would contribute to more sustainable transport, and could potentially shift over one million air passengers to the train each year and cut the emissions from aviation by almost 100,000 tonnes CO2 per year.

An improved railway connection would also greatly increase accessibility and commuting opportunities between cities along the route, connecting 3.4 million people in two countries, eight labour market areas and over 50 municipalities including four urban nodes (Oslo-Örebro-Västerås-Stockholm).

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 provides a high speed rail connection 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 ScanMed) and we would also ask for the route to be added to the ScanMed passenger map in Annex III “Alignment of the European Transport Corridors” as well as all of the individual elements of the project being 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.

As well as the major nodes of Stockholm and Oslo the nodes of Örebro, Västerås and Karlstad would then also be connected. Both Örebro and Västerås are on the map as new urban nodes and this project will provide a rail connection for Västerås which currently does not have the mandated rail connection included in the TEN-T. Karlstad is expected to qualify as an urban node in the near future.

Specific rail route sections are :

• Stockholm to Örebro via Västerås – current rail line to be added to the TEN-T passenger rail network and upgraded to high speed.

• Örebro-Karlstad – new construction section of route between Örebro-Kristinehamn and included in TEN-T – Kristinehamn to Karlstad via existing Core rail network to be upgraded to high speed.

• Karlstad to Norwegian border via Arvika - Karlstad to Arvika existing Core rail network to be upgraded to high speed. Thereafter a new section of route to be constructed to the Norwegian border and included in TEN-T

• In Norway a new section of the line to be constructed and included in the TEN-T to connect the above section from the SE border and link to the existing lines running into Oslo.

- Upgrade the Rail/RoadTerminal in Padborg (DK) to the Core network

Justification of this amendment

The terminal is located just north of the Danish-German border, and is one of the most important RRTs in Denmark. It has similar volumes as neighbouring terminals which are "core terminals".

- The ports of Hanstholm and Skagen (DK) to be included in the comprehensive network.

Justification of this amendment

The ports are some of the most important fishing ports in Europe. They do not meet the threshold criteria in the TEN-T for comprehensive ports based on tonnes, but we believe they should be considered based on importance of their fish landings to the European market.

- The cross-border section of railway from Emmen (NL) to Rheine (DE) to be included in the comprehensive network.

Justification of this amendment

This section connects rural areas in Northern Netherlands to European rail connections and high-speed lines, and will contribute to a shift to rail for passengers and freight. It also contributes to a better hinterland connection for the ports of Rotterdam and Amsterdam to Germany and Scandinavia and helps to tackle congestion in heavily populated areas in the Netherlands and Germany.

- The new railway line from Amsterdam to Groningen (NL) – Lelylijn – to be included in the extended core network as a crucial part of the existing missing link in the TEN-T network between Amsterdam and Hamburg.

Justification of this amendment

In December 2021 the Lelylijn has been included in the agreement of the Dutch governing coalition, which aims to improve the international train connection to Northern Germany. The Lelylijn will fulfil the technical requirements and is planned to be finished by 2038, so it will also meet the 2040 deadline.

Combined with developments such as the CEF-Flagship project Wunderline between Groningen and Bremen and the Fehmarn belt Fixed Link between Hamburg and Copenhagen, the Lelylijn will ensure that the TEN-T link between Western Europe and

Northern Europe will experience a major upgrade. It will help to improve the resilience of the cross-border railway connection between the northern parts of the Netherlands and Germany. In addition, the railway link can provide a further boost to increase the uptake of hydrogen in Europe as it connects highly innovative regions, among which the first European Hydrogen Valley in the Northern Netherlands.

- Consider to add urban nodes which meet the definition of the draft TEN-T regulation to the TEN-T network in Norway, as part of the process of updating the maps in dialogue between the European Commission and the Norwegian Government.

Justification of this amendment

There are currently no urban nodes identified as part of the TEN-T in Norway, apart from "the capital" of Oslo. As Norway is not part of CEF, there must be other instruments for achieving integration between long distance traffic and regional and local transport. A network of urban nodes will also support a polycentric regional development. One idea that should be explored further in dialogue with the Norwegian government and the EU is to include urban functional areas that meet the definition of urban nodes proposed in the draft TEN-T regulation. These urban areas are subject to compulsory agreements with the Norwegian state (city growth agreements – "byvekstavtale"- and urban area agreements – "byregionsavtale", and medium sized cities with an own financial support scheme – "bypakker") in the National transport plan (2022-2033). These urban areas have compulsory agreements, or are working towards achieving agreements with the state, and have a cooperation between the national, regional and local levels around sustainable urban development and mobility.

Illustration: Map on the suggested nodes and links to the TEN-T map by the CPMR North Sea Commission

Source: CPMR https://cpmr.org/