UNION INTERNATIONALE DES SOCIETES DE TRANSPORT COMBINE RAIL-ROUTE

COMBINATO STRADA-ROTAIA



UNIONE INTERNAZIONALE DELLE SOCIETA PER IL TRASPORTO INTERNATIONALE VEREINIGUNG DER GESELLSCHAFTEN FÜR DEN KOMBINIERTEN VERKEHR SCHIENE-STRASSE

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Page 1 of 3

Rail Transport and Interoperability Unit D.2 / DG MOVE European Commission

E-mail: MOVE-RAIL-FREIGHT-CORRIDORS@ec.europa.eu

Attn: Mr Gerhard Troche

Subject: UIRR's input to the Handbook on Regulation concerning European rail network for

competitive freight

Dear Mr Troche,

Firstly please allow me to congratulate DG MOVE upon the unprecedented idea, and welcome it, to prepare a Handbook aiding the interpretation and implementation of the "Corridor Regulation" by the Member States and all other concerned entities. We think that this would be a desirable practice not only with this particular piece of legislation, but also with other legislation coming up like the amendment of the Eurovignette Directive or the re-cast of the First Railway Package.

Our comments are focused on Chapter 3 of the Handbook (Governance of a rail freight corridor). In general we feel that besides explaining the role of the various bodies foreseen to control and operate these corridors, more concrete requirements ought to be inserted such as:

2.2.1 The table listing the various Corridors should be extended with the names of the Member States concerned by each Corridor.





Rail Freight Corridor			ERTMS- Corridor		Concerned Member States
1	Rhine Corridor	Zeebrugge-Antwerp/Rotterdam-Duisburg-[<i>Basel</i>]-Milan-Genova	A	Rotterdam – Genova	BE, NL, DE, IT + CH
2	Benelux-France Corridor	Rotterdam-Antwerpen-Luxemburg-Metz-Dijon- Lyon/[Basel]	С	Antwerp – Basel – Lyon	NL, BE, LU, FR + CH
3	Central North- South Corridor	Stockholm-Malmö-Copenhagen-Hamburg- Innsbruck-Verona-Palermo	В	Stockholm - Naples	SE, DK, DE, AT, IT
4	Atlantic Corridor	Sines-Lisboa/Leixões - Madrid-Medina del Campo/Bilbao/San Sebastian-Irun- Bordeaux-Paris/Le Havre/Metz Sines-Elvas/Algeciras	-		PR, ES, FR
5	Balt-Med Corridor (Baltic- Mediterranean Corridor)	Gdynia -Katowice-Ostrava/Zilina- Bratislava/Vienna- /Klagenfurt - Udine- Venice/ Trieste / - Bologna/Ravenna/ /Graz-Maribor-Ljubljana-Koper/Trieste	-		PL, CZ, SK, AT, IT, SE + CR
6	Mediterranean Corridor	Almería-Valencia/Madrid-Zaragoza/Barcelona- Marseille-Lyon-Turin- <i>Milan-Verona - Padua/Venice -</i> Trieste/ Koper-Ljubljana-Budapest-Zahony (Hungarian-Ukrainian border)	D	Valence – Lyon – Ljubljana – Budapest	PR, ES, FR, IT, SE, HU
7	Orient Corridor	- Bucharest-Constanta Prague-Vienna/Bratislava-Budapest - Vidin-Sofia- Thessaloniki-Athens	Е	Dresden – Prague – Budapest	GR, BG, RO, HU, SK, CZ + CR
8	Central East- West Corridor	Bremerhaven/Rotterdam/Antwerp-Aachen/Berlin- Warsaw-Terespol (Poland-Belarus border)/Kaunas	F	Duisburg – Berlin - Warsaw	BE, NL, DE, PL, LI
9	Eastern Corridor (Czech-Slovak Corridor)	Prague - Horni Lideč - Žilina-Košice-Čierna nad Tisou - (Slovak/Ukrainian border)	-		CZ, SK

Reasoning: Member States and stakeholders will have an easier, more obvious reference to know which Member State, which Ministry should be acting to prepare for the implementation.



- 3.2 Ministries responsible for transport in the various Member States hosting a non-ERTMS corridor should form the Executive Board, which is ideally to take place by the end of 2011. Reasoning: each Executive Board is foreseen to hold a minimum one meeting per year. If the we assume that the initial meeting would agree on a multi-year preparatory work agenda it would allow almost two years (and two Executive Board meetings) to prepare for the Regulation to become effective on 9 November 2013, which considering the complexity of the cross-border rail collaboration foreseen by the Regulation is absolutely necessary to have the Corridors foreseen by the Regulation functioning from the timetable period beginning in December 2013.
- 3.3 Formation of the Management Boards may occur in parallel to the forming of the Executive Boards, and should take place until 30 June 2012 the latest. Reasoning: same as above.
- 3.4 As one of their first actions, management boards should initiate the formation of their respective advisory boards. Advisory boards should become functional (hold their initial meeting) by the end of 2012 the latest. Reasoning: The role of these Advisory Groups is essential from several aspects not only in the operations of the Corridors, but even more during the preparatory phase of implementing the Regulation. Hence an expected deadline for their formation should also be included in the Handbook.
- 5.1.1 The OSS for each Corridor should be set up by 9 November 2013 to be ready to issue paths from the timetable period beginning in December 2013. Reasoning: If Member States await for the Regulation to take effect on 9 November 2013 to begin establishing the OSS the entire Regulation will not be able to fulfil its role until years later.

Finally, we feel that the role of the European Commission in aiding and overseeing the implementation of the Regulation should be repeatedly declared in the Handbook, whereby Member States as well as stakeholders will feel that the Commission (DG MOVE) will continue to follow up the fate of the Regulation (beyond the issuance of this Handbook and the obligatory status reports of Member States).

We trust that you will find our comments useful and therefore apply them into the Handbook. Allow me to reassure you, Mr Troche, and DG MOVE in general of UIRR's support of this Regulation. We are confident that if properly implemented, this legislation has the ability to materially improve the quality of border crossing rail freight services throughout Europe.

With sincere regards,

Rudy Colle

Executive Chairman