

## TEN-T revision: a good proposal to be further refined

UIRR applauds the Commission's proposal to amend the TEN-T Regulation<sup>1</sup>. The text generally delivers on the UIRR position paper that has been published as an input to the Commission's drafting on 19 April 2021<sup>2</sup>. The proposal can be further refined from the perspective of the European intermodal freight transport sector, which is outlined in the position paper published today<sup>3</sup>. The following 6 points are recommended to the EU legislators by UIRR:

1. Refocus the underlying policy principle of the proposal to devote investment resources uniquely to those low-risk solutions, which have already demonstrated their capability to deliver the policy objectives of the European Union.
2. Elevate the standing of rail freight in line with its results under the socio-economic cost-benefit analysis.
3. Mandate the creation of a Transport Information Portal as part of the TEN-T digital infrastructure and make the compliance with the quality criteria for freight part of this Transport Information Portal.
4. Review the line and terminal designations contained in the annexes of the proposal, and define a simple administrative process to amend these annexes after the adoption of the legislation.
5. Adjust the punctuality criteria for freight trains to those of passenger trains, applying the principle of equivalence: reference measurement at 5 minutes.
6. Specify the CT-related infrastructure parameters (CT profiles for all types of loading units) and strengthen the concept of network resilience by introducing mandatory interconnections between corridors as well as bypass options, with the aim of improving the reliability of transport services.

UIRR regrets that the *modal silo approach*, whereby each mode is enabled to do the best it can to meet the policy objectives, has extensively influenced the Commission proposal. The silo-approach, despite all technology improvements, caused the increase of every category of transport externality that Europe has been battling. Moreover, it exacerbated the energy dependency of the continent, while creating a significant truck driver shortage.

The notion of *shifting the balance of modes*, which has been a secondary driver of European transport policymaking since 2001, has been subordinated despite relentlessly delivering tangible results. According to a study released in November 2021<sup>4</sup>, door-to-door Combined Transport uses 40-70% less energy per tonne-kilometre, while leaving behind a 60-90% smaller carbon footprint than its equivalent end-to-end unimodal trucking operation.

Combined Transport has proven that it works, delivers results, while not requiring scientific breakthroughs or exorbitant and risky public investments. Moreover, intermodality is an effective tool to reduce Europe's dependency on external energy supply.

TEN-T policy should also focus on the cohabitation of passenger and freight transportation on the infrastructure. *Socio-economic cost-benefit analysis* should be used to decide the primary objectives of infrastructure development.



Ralf-Charley Schultze

*"Combined Transport offers the most effective answer to reduce Europe's dependency on external energy supply. The TEN-T regulation, like other relevant policy instruments, should focus on efficient solutions to achieving transport policy objectives, such as decarbonisation, but these solutions must also contribute to the safety of the continent."* – stated UIRR President Ralf-Charley Schultze.

### Who is UIRR?

Founded in 1970, the **International Union for Road-Rail Combined Transport** (UIRR) represents the interests of European road-rail Combined Transport Operators and Transshipment Terminal Managers.

Road-Rail Combined Transport (CT) is a system of freight forwarding which is based on efficiently and economically inserting electric rail into long-distance (road) transport-chains through the use of intermodal loading units (ILU).

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<sup>1</sup> [https://eur-lex.europa.eu/resource.html?uri=cellar:7b299e69-5dc8-11ec-9c6c-01aa75ed71a1\\_0001\\_02/DOC\\_1&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:7b299e69-5dc8-11ec-9c6c-01aa75ed71a1_0001_02/DOC_1&format=PDF)

<sup>2</sup> <https://www.uirr.com/en/media-centre/press-releases-and-position-papers/2021/mediacentre/1830-position-paper-ten-t-guidelines-revision-key-to-a-competitive-infrastructure.html>

<sup>3</sup> <https://www.uirr.com/en/media-centre/press-releases-and-position-papers/2022/mediacentre/2202-position-paper-ten-t-regulation-amendment-putting-efficiency-in-the-focus.html>

<sup>4</sup> <https://www.uirr.com/en/media-centre/press-releases-and-position-papers/2022/mediacentre/2103-press-release-combined-transport-carbon-footprint-and-energy-efficiency.html>