UIRR
INTERNATIONAL UNION FOR ROAD-RAIL COMBINED TRANSPORT

POSITION PAPER

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Implementation of the new TEN-T Regulation from an intermodal rail freight perspective

The European Combined Transport Community applauded the adoption of the revised TEN-T Guidelines Regulation (Regulation 2024/1679) [1] as it is seen as suitable to resolving the heterogeneity and other shortcomings of the Single European Railway Area's infrastructure network.

Executive summary

Focusing on the infrastructure needs of **"doubling the share of rail freight"**, as contained in the Strategy for Smart and Sustainable Mobility, the infrastructure of the Single European Railway Area will need to be modernised and harmonised pursuant to the technical parameters contained in the revised TEN-T Guidelines Regulation.

Intermodal rail freight is the most dynamically growing production system of rail freight. Satisfying the particular needs of intermodal users is therefore of the utmost importance. The European legislator rightfully recognised that **operational standards** must be kept in mind when designing the infrastructure modernisation projects. Two key performance indicators (KPIs) were included in the regulation on (i) the expected **punctuality performance of cross-border freight trains** and (ii) on the time needed to fulfil the **technical border crossing requirements** on internal EU borders – when crossing from one country's network onto another.

Transhipment terminals, which are the gateways for freight to access the infrastructure, have for the first time been recognised in the revised TEN-T Guidelines Regulation. The access routes and last-mile railway sections, as well as the infrastructure of the terminal will need upgrading to perform the same functions and to deliver the same standardised services throughout the entire network.

The financing capability of EU Member States and the capacity of ongoing railway transport operations to absorb the disruptions caused by infrastructure works are both limited. Therefore, it is essential for the intermodal rail freight community to formulate and then to convey its **infrastructure priorities** to the Member State decisionmakers.

Operating over 80% of cross-border freight trains, the largest share within cross-border rail transport activities in Europe, the advice of the intermodal rail freight stakeholders is valuable from the perspective of planning and governance. Having been the prime customers of European Rail Freight Corridors over the 12 years of their history, intermodal freight transporters have ample experience to share with the Member State governments put in charge of implementing the TEN-T Regulation.

This paper contains recommendations on every aspect of the TEN-T Regulation relevant to a cross-border freight train operator with the exception of transhipment terminals, which has been addressed in a sister-paper[2] to this one.

[1] https://eur-lex.europa.eu/eli/reg/2024/1679/oj/eng

[2] https://www.uirr.com/sites/default/files/documents/TEN-T.Reg_Implementation-terminals_January.2026.pdf

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1. **Rail freight minded technical parameters:** 740m train length, 22,5t axle load, 100km/h track speed, 4m loading gauge, adequate bypass capacities, adequate border crossing capacities, inclusion of rail last mile in the TEN-T network (to/from terminals and the TEN-T main line), electrification, ERTMS, support for the modernisation of transhipment terminals

   - **Recital (48):** "*Intermodal transport accounts for around half of rail freight tonne-kilometres in Europe, with its share growing. In order to achieve goals stipulated in the Commission Communication on the Sustainable and Smart Mobility Strategy to double the portion of freight transport carried by railway, special attention should be paid to transport which combines rail for the main part of the journey and truck for the first and last mile. With a view to contributing to the increase of intermodal traffic, the infrastructure should allow for the circulation of freight trains carrying standard semitrailers up to 4 m high loaded at a height of at least 27 cm above the top of the rail track while a minimum height of 33 cm should be encouraged. However, complying with that requirement entails numerous, sometimes costly, adaptation. It is therefore important to find a balanced approach to the implementation of this requirement and to ensure that its implementation is done in a cost–effective manner. In this respect, Member States should ensure that the requirement is implemented in a way that at least one domestic direct line, one direct rail freight line connection with neighbouring Member State or Member States, and one connection to at least one rail road terminal or multimodal freight terminal located in or adjacent to a maritime port which is part of the European Transport Corridor in the territory of a Member State is ensured. Moreover, if one or more end points of a corridor are located on the territory of a Member State, there should be at least one direct line meeting that requirement to at least one of these end points. When selecting the relevant lines, Member States should take into account the current and future rail freight transport flows. When assessing exemptions requests from the requirement related to carriage of the semi-trailers under this Regulation, the Commission should particularly take into consideration the result of the socio-economic cost-benefit analysis, as well as the potential disruption of the services caused by the necessary work needed to meet this standard. Moreover, when assessing requests for the exemptions from the requirements applicable to the railway infrastructure of the extended core network, the Commission should particularly take into consideration any major investment undertaken by the Member State concerned on a parallel line in close proximity to the ones to be newly constructed.*"

UIRR endorses the spirit of the recently revised TEN-T Guidelines Regulation and the technical parameters for the railway infrastructure contained in it as being the right ones to serve as the basis for the harmonisation of the Single European Railway Area.

The intermodal rail freight community recognises that the financing constraints of some EU Member States may not enable the timely implementation of the necessary upgrades. From their extensive experience of cross-border freight train operations, UIRR members relay the **most urgent and impactful infrastructure upgrades** needed to be made on the network in the Annex of this paper.

Sections of the TEN-T railway network to be prioritised for modernisation from a rail freight perspective have been added in the Annex of this paper as an input to the European Transport Corridor Implementation Plans currently under finalisation.

UIRR: The members of UIRR call on the EU Member states to take into account the recommendations contained in the tables annexed to this paper when devising their rail infrastructure investment plans for the coming years.

Member States should take a particular effort to ensure that 740m train length becomes the standard even beyond the minimum levels prescribed in the TEN-T Regulation.

2. **KPIs for operational requirements**: the lawmaker agreed to insert two crucially important operational performance indicators into the Regulation. Rail freight operators and intermodal customers hereby offer their interpretation on who could these be achieved.

- ***Article 18*** – **Operational requirements for the European Transport Corridors**

1.The Rail Freight governance shall make all possible efforts to ensure by 31 December 2030, that, on the European Transport Corridors, the quality of services provided to railway undertakings and technical and operational requirements for infrastructure use do not prevent the operational performance of rail freight services along the European Transport Corridors from meeting the following target values:

(a) for each internal cross-border section, the dwelling time of all freight trains crossing the border between two Member States does not exceed 25 minutes on average, except at the sections where a change of track gauge takes place or where the checks carried out at a border where the controls have not yet been lifted on trains in application of point 1.2 of Annex VI to Regulation (EU) 2016/399 do not allow for this time-limit to be complied with; the dwelling time of a train on a cross-border section means the total additional transit time that can be attributed to the existence of the border crossing, irrespective of procedures or considerations of infrastructural, operational, technical and administrative nature; dwelling time does not include the time that cannot be attributed to the border crossing, such as operational procedures carried out in facilities located in the proximity of the border crossing but not intrinsically related to it; and

(b) at least 75 % of the freight trains crossing at least one border along a European Transport Corridor arrive at their destination, or at the external Union border if their destination is outside the Union, at their scheduled time or with a delay of less than 30 minutes by reasons that are attributable to the infrastructure manager(s) of the Union; delays occurring in and attributable to third countries that are crossed by freight trains shall not be taken into account.

UIRR: The following interpretation of the two KPIs should be used.

The border-crossing KPI: the infrastructure of the border crossing should be developed with a view to provide enough physical space to carry out the required technical process based on the **national safety rules** of the involved Member States not forgetting the **administrative procedures.** The infrastructure should have the **capacity to process the number of trains** that are foreseen to pass based on historic experience and projected future needs.

Incremental progress is of the essence. The most critical border crossings to address have been indicated in the Annex. The future needs will have been assessed by each Member State in the Terminal Capacity Studies to be completed in accordance with the Regulation by July 2027.

Punctuality KPI: the actual punctuality performance of freight trains which cross at least one internal border between EU Member States significantly lags the targeted 75% value. Upgrades to the infrastructure on their own will not be enough to meet this KPI, therefore Member States should support that the timetabling and traffic management procedures are also adjusted accordingly by recognising these KPIs as integral requirements of the new Railway Infrastructure Capacity Management Regulation.

UIRR provided an input to the delay reason codes through the EU-funded EDICT project[3].

[3] https://edict-project.eu/

3. **Planning, governance and implementation**: the TEN-T Guidelines Regulation introduces the European Transport Corridors as the new structure of planning, governance and implementation, which will replace the TEN-T Corridors and will integrate the Rail Freight Corridors. The European Transport Corridor Coordinators will assume a pivotal role in the planning and coordination of a smooth implementation of the TEN-T Regulation.

- ***Article 54*** **– The European Transport Corridors**

Without prejudice to the competences of the rail freight governance under Regulation (EU) No 913/2010 and to the competence of the Member States with respect to management and financing of infrastructure, the European Coordinators of the European Transport Corridors shall cooperate closely with the Member States concerned and the rail freight governance in order to:

(a) help identify priorities and investment needs for rail freight on the rail freight lines of the European Transport Corridors taking into account the benefits provided to the trans-European transport network and the overall completion dates as set out in this Regulation; and

(b) monitor the performance of rail freight services, and identify potential barriers, such as technical, administrative and operational ones, with a particular focus on the cross-border dimension, and make recommendations in this regard, where relevant.

The work plan for the European Transport Corridor shall provide a detailed analysis of the state of implementation of the corridor concerned, which includes in particular:

(a) a description of the characteristics of the corridor, in particular the cross-border sections;

(b) an analysis of the state of compliance of the corridor with the transport infrastructure requirements of this Regulation and its related progress achieved, including potential delays;

(c) an identification of the missing links and bottlenecks hampering the development of the corridor, with particular attention to the cross-border sections;

(d) an analysis of the investments required, including the different financing and funding sources committed or envisaged, or both, for the implementation of the projects needed for the development and completion of the corridor, in particular the cross-border sections;

(e) a description of possible solutions to address the investment needs and bottlenecks, in particular for the passenger and freight lines and links of the corridor, with the objective of meeting the deadlines set out in this Regulation;

(f) *a plan, that may contain intermediate indicative milestones, for the removal of physical, technical, digital, operational and administrative barriers between and within transport modes and for the enhancement of efficient and accessible multimodal transport with particular attention to rail and its cross-border sections and national missing links*.

UIRR: European-level coordination of the European Transport Corridor implementation plans as well as within and between neighbouring Member States is of the essence. The involvement of combined transport operators (CTOs) in their capacity of Authorised Applicant can be particularly beneficial since CTOs have the broadest oversight of door-to-door freight transport-chains criss-crossing the Continent.

- ***Work plan of the European Coordinator***

(a) *support the coordinated implementation of the European Transport Corridor or horizontal priority concerned;*

(b) *draw up a work plan together with the Member States concerned and, where relevant, in consultation with neighbouring countries which are part of the European Transport Corridors, monitor its implementation in accordance with Article 54;*

1. *Each European Coordinator of the European Transport Corridors and the two horizontal priorities shall draw up, at the latest by 19 July 2026 and every four years thereafter, a work plan that provides a detailed analysis of the state of implementation of the corridor or horizontal priority under his or her competence and its compliance with the requirements of this Regulation, as well as the priorities for its future development.*

2. *The work plan shall be prepared in close cooperation with the Member States concerned, and where relevant the neighbouring countries which are part of the European Transport Corridor, and in consultation with the Corridor Forum and rail freight governance, or consultative Forum of the horizontal priority. The work plan of a European Transport Corridor shall be approved by the Member States concerned. Neighbouring countries which are part of a European Corridor shall be consulted. The Commission shall submit the work plan for information to the European Parliament and the Council.*

When drafting the work plan, the European Coordinator shall take into account the implementation plan referred to in Article 9 of Regulation (EU) No 913/2010.

(c) *consult with the Corridor Forum or the consultative forum for the horizontal priorities respectively in relation to that work plan and its implementation and regularly inform the Forum on the implementation of the work plan;*

(d) *report to the Member States, to the neighbouring countries that are part of the European Transport Corridors to the European Parliament and to the Commission and, as appropriate, to other entities directly involved in the development of the European Transport Corridor or horizontal priority on any difficulties encountered and, in particular when the development of a corridor or horizontal priority is being impeded, with a view to helping to find appropriate solutions; and*

(e) *submit an annual status report to the European Parliament, the Council, the Commission and the Member States concerned on the progress achieved in implementing the European Transport Corridors and horizontal priorities; that annual status report shall focus on the progress made on key priorities and investments, describe the nature of problems encountered in their implementation, and suggests potential solutions.*

UIRR: The invitation and involvement of combined transport operators (CTOs), as well as UIRR in the capacity of their association is of an essential importance. European Transport Corridor Coordinators should take particular care to channel the invaluable experience and insights of CTOs into the work planning, during the implementation and the oversight functions.

- ***Article 6o – Alignment of national plans with Union transport policy***

  1.Member States shall ensure that national plans and programmes contributing to the development of the trans-European transport network are coherent with Union transport policy and with the priorities and deadlines set out in this Regulation. They shall also take into account, inter alia, the priorities set out in the work plans for the relevant corridors and horizontal priorities for the Member States concerned and where applicable the implementing acts referred to in Article 55(1) and (2).

  2.Member States shall provide the Commission with the relevant draft national plans or programmes contributing to the development of the trans-European transport network or an abstract thereof, and any significant modification of those as soon as possible after a public consultation of this plan or programme is launched.

  The Commission may issue an opinion on the coherence of the draft national plans and programmes with the priorities set out in this Regulation and with the priorities set out in the work plans of the corresponding European Transport Corridors and of the horizontal priorities and in the implementing acts adopted in accordance with Article 55(1) and (2). The opinion shall not affect the validity of the national plans and programmes and shall not prevent their adoption and application.

  Member States shall also provide the Commission with the final national plans or programmes once adopted.

UIRR: combined transport operators should be involved in every Member State when drawing up national plans and programmes through national associations and with the help of UIRR. And every Member State should take its obligation to draw up long-term national plans of development that can exist over several election periods and multiple governments.

4. **Tasks of the European Transport Corridors**: equal responsibilities covering freight and passenger transport extending to every mode of transport. Multimodal inclusivity should be upheld. Bottlenecks, cross-border connectivity, and the improvement of efficiency and sustainability, as well as wider transport policy objectives and interoperability should be promoted.

   Recital (35) *European Transport Corridors should cover the most important long-distance transport flows and consist of key European transport multimodal axis, based on parts of the trans–European transport network, cross borders, be multimodal and open to the inclusion of all transport modes covered in this Regulation, and may also include neighbouring countries.*

   Recital (83) *European Transport Corridors should help to develop the infrastructure of the trans-European transport network in such a way as to address bottlenecks, enhance cross-border connections and improve efficiency and sustainability. They should contribute to cohesion through improved territorial cooperation including with neighbouring countries. They should also address wider transport policy objectives and facilitate interoperability, modal integration and multimodal operations. The corridor approach should be transparent and clear and the management of such corridors should not create additional administrative burdens or costs. The Commission should be able to recommend the establishment of single entities for the coordination, construction or management of cross-border infrastructure projects of common interest, with a view to facilitating the implementation of large-scale and complex cross-border infrastructure projects and recommend, when relevant, cooperation between cross-border regions to target challenges in mobility.*

UIRR: European Transport Corridors are for passengers and for freight. Freight should not be relegated to second fiddle. Freight transport using all modes, and especially by rail, should get the attention that it deserves. For each transport and mobility task the proper, economically suitable modal solution needs to be identified and then promoted.

5. **Availability of terminals throughout the Comprehensive Network**: The upgrade of the infrastructure for combined railway transport and of terminals is an important element to ensure that intermodal transport is primarily done by rail, inland waterways or short-sea shipping.

Article 21 *Transport infrastructure requirements for the comprehensive network*

1. Member States shall ensure that inland ports on the comprehensive network, by 31 December 2050:

(a) will be connected with the road or rail infrastructure;

(b) offer at least one multimodal freight terminal open to all operators and users in a non-discriminatory way and which shall apply transparent and non-discriminatory charges;

(c) are equipped with facilities to improve the environmental performance of vessels in ports, including reception facilities, degassing facilities, noise reduction measures, measures to reduce air and water pollution.

Article 25 *Transport infrastructure requirements for the comprehensive network*

2. Member States shall ensure that, by 31 December 2050:

(d) maritime ports of the comprehensive network will be connected with the rail and road infrastructure and, where possible, inland waterways, except where specific geographic or significant physical constraints prevent such connection;

(b) any maritime port of the comprehensive network that serves freight traffic offers at least one multimodal freight terminal which is open to all operators and users in a non-discriminatory way and which applies transparent and non-discriminatory charges;

UIRR: The European public and the actors of the European economy should form a stable and long-term coalition to support the development of a transportation infrastructure, without which the European way of life is not possible and the European Single Market cannot function. Combined Transport should be turned into he backbone of freight transport throughout the continent. This will require both the railways and the waterways belonging to each European Transport Corridor as well as the necessary terminals to connect them to the road network so they can fulfil their interface functions.

6. **Maintained obligation to consult with terminals**:

Article 65 *'ORGANISATION AND MANAGEMENT OF THE FREIGHT CORRIDORS'*
'7. The management board shall set up an advisory group made up of managers and owners of the terminals of the freight corridor including, where necessary, sea and inland waterway ports. This advisory group may issue an opinion on any proposal by the management board which has direct consequences for investment and the management of terminals. It may also issue own-initiative opinions. The management board shall take any of these opinions into account. In the event of disagreement between the management board and the advisory group, the latter may refer the matter to the executive board and to the European Coordinator concerned by the freight corridor. The executive board and the European Coordinator concerned by the freight corridor shall act as an intermediary and provide its opinion in due time. The final decision however shall be taken by the management board.'

Measures for developing the freight corridor:

4. The implementation plan shall take into account the development of terminals, including the market and prospective analysis on multimodal freight terminals as well as the action plans of the Member States of the freight corridor, referred to in Article 35(3) and (4) of Regulation [... new TEN-T Regulation].

UIRR: Freight terminals are a unique type of service facility, dominantly owned and operated by private entities mostly small of medium size enterprises (SMEs) yet forming essential bridges between the various modes of transport. Multimodal freight transport offers the cheapest and easiest solution to the best freight transport solution from a socio-economic and environmental perspective. Managers of the freight terminals should be involved in the implementation of TEN-T.

7. **Monitoring of progress**: due to the complexity of deadlines that the EU lawmaker specified in the new Regulation, as well as the importance of incremental and timely delivery, transparency of progress, regular reporting and monitoring is of the utmost essence.

   UIRR proposes to systematically monitor the progress in the reports to be prepared by the Commission in 2026 and every four years thereafter.

UIRR: Progress monitoring needs to be regular and clear to hold a mirror to society, to economic actors and to politicians on the achievement of the essential transport infrastructure needed for our shared way of life. UIRR and the European Combined Transport Community is ready to lend a hand, to hold up this mirror. We have done it in the past 55 years, and we will do it during the coming decades of implementation.

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ANNEX: priority railway line sections for upgrades from an intermodal rail freight perspective including connecting lines to major ongoing infrastructure elements such as the Lyon-Turin line (FR-IT), the Fehmarn belt fixed link (DK-DE), the Brenner Base Tunnel (DE-AT-IT), and the Rail Baltica line (PL-LT-LV-EE-FI).

Parameters:

(a) 740m train length,
(b) 22,5t axle load,
(c) 100km/h track speed,
(d) 4m loading gauge,
(e) adequate bypass capacities (double track),
(f) adequate border crossing capacities,
(g) inclusion of rail last mile in the TEN-T network (to/from terminals and the TEN-T main line),
(h) electrification,
(i) ERTMS

Belgium

	Description	Length (km)	Parameters to fix
1.	Antwerpen – Liege	104km	740m train length
2.	Liege – Aachen	40km	740m train length
3.	Liege – Gouvy	56km	740m train length
4.	Liege - Athus	107km	740m train length

France

	Description	Length (km)	Parameters to fix
1.	Tunnels of the vogues (d'Arzviller, de Lutzelbourg, de Haut-Barr)	total 3km	4m loading gauge

Germany

	Description	Length (km)	Parameters to fix
1.	Emmerich – Cologne – Mannheim – Basel	484km	740m train length
2.	Emmerich border crossing area	n/a	border crossing capacity
3.	Cologne, Mannheim, Duisburg areas	n/a	railway last mile capacities
4.	Munich – Innsbruck (Brenner Base Tunnel feeder line)	98km	4m loading gauge, 740m train length
5.	Frankfurt Oder border crossing (incl bridge)	n/a	border crossing capacity

Hungary

	Description	Length (km)	Parameters to fix
1.	New V-Zero freight bypass line + bridge	113km	needs to be built
2.	Railway last mile to 2 terminals in Csepel (incl Gubacsi bridge)	n/a	track speed, 22,5t axle load, electrification, 740m train length, double track

Italy

	Description	Length (km)	Parameters to fix
1.	Fortezza – Verona (Brenner Base Tunnel feeder line)	157km	4m loading gauge, 740m train length

Netherlands

	Description	Length (km)	Parameters to fix
1.	Venlo border crossing area	n/a	border crossing capacity
2.	Rotterdam (to/from the port)	n/a	railway last mile capacities