

# Public Consultation on Regulation (EU) No 1315/2013 on Union guidelines for the development of the trans-European transport network

Fields marked with \* are mandatory.

## Introduction: Context and purpose of the consultation

The EU holds responsibility on infrastructure policy - in the fields of transport, energy and telecommunications - since 1 November 1993. Accordingly, the Union shall contribute to the establishment and development of trans-European networks (TEN).

In the transport sector, Europe's TEN-T policy remains key in preventing obstacles to the free circulation of goods, services and citizens throughout the EU in a growing area without frontiers. It aims to boost economic, social and territorial cohesion between all Member States and their regions. More and more, it has become a transport infrastructure concept that extends to EU neighbours and is part of the cooperation with other areas of the world. Importantly, TEN-T policy is at the same time close to European citizens': enhancing accessibility of their home regions and providing connectivity with distant destinations.

Newer developments are going on in transport and other policy fields, which interact with TEN-T policy:

- Global transport flows are changing in volume and direction;
- Interconnection and interoperability between the modes of transport but also with energy and telecommunication networks, projects of common interest with other third countries as well as the UK's withdrawal from the EU will change the EU's "internal transport landscape"
- The transport system is undergoing a fundamental transformation – In the context of a long-term climate strategy the wider deployment

of automation, digitalisation and clean vehicles is becoming a reality;

- Improving Military Mobility and dual-use (civilian and military) infrastructure across the Union making better use of our transport network, to ensure that military needs are accounted for when planning or updating certain infrastructure projects is also an important element.

Such developments will entail stronger association of infrastructure with issues such as infrastructure use, efficiency, enhancing mobility concepts or new social questions in transport. They will also call for stronger cooperation between Member States and a wide range of other actors – public and private ones. Not least, synergies between transport and the energy, digital and telecommunication sectors will increase.

Against this background, the Commission has decided to undertake a comprehensive evaluation of Regulation (EU) No 1315/2013 on Union guidelines for the development of the TEN-T.

This public consultation is designed to support the evaluation of the current Regulation by gathering the views of stakeholders. The Commission published on 13 September 2018 an Evaluation Roadmap.

The survey contains six sections:

- A. General questions on Regulation 1315/2013
- B. The form of the TEN-T network
- C. The features of the TEN-T network
- D. Infrastructure use on the TEN-T network
- E. Implementation tools for the TEN-T network
- F. Further information

## [A. General questions on Regulation EU 1315/2013 on the TEN-T guidelines](#)

Over the years, TEN-T policy has grown into a genuine "European project" that gives direction to public and private investments – to achieve long-term benefits for society, such as accessibility and connectivity of states and regions as well as to facilitate economic development and exchanges in the internal market. Within the framework

of the European Union's transport policy, TEN-T provides the basis for efficient, safe and sustainable transport operations. It is, therefore, directly interrelated with a wide range of EU actions on sectoral transport policies and it is a vital enabler of strategic transport policy objectives overall.

The TEN-T Guidelines establish eligibility for EU funding, notably under the Connecting Europe Facility and the Cohesion Fund. Priorities for TEN-T development, arising from the TEN-T guidelines, have been taken up in the corresponding funding legislation and been reflected in budget allocation procedures. In this respect, both "traditional" infrastructure projects (cross-border projects, railway or inland waterway projects, transport terminals etc.) and infrastructure components ensuring quality, efficiency, safety and sustainability of transport operations (intelligent transport systems, charging/refuelling for alternative fuels etc.) have been subject to EU funding.

Regulation (EU) N° 1315/2013 pursues a range of specific objectives, which can be grouped, into four main themes that were also used to structure this questionnaire: form of the network, features of network infrastructure, infrastructure use and implementation of the network.

\*1. In your view, how important is it to have a transport infrastructure policy at EU level?

- **Very important - selected**
- Important
- Somewhat important
- Not important
- No opinion

Could you please explain briefly your answer?

As State Party to the UN Convention on the Rights of Persons with Disabilities (UN CRPD), EU has clear obligations to ensure that the rights of persons with disabilities are fully respected. This includes taking appropriate measures to ensure persons with disabilities access, on equal basis with others, to transportation infrastructure. Furthermore, accessible transport is a vital and obligatory condition for guaranteeing the implementation of one of the four freedoms granted by the European Union - free movement within its borders - to its citizens, including the 80 million persons with disabilities in the EU. Having competence on transport policy, EU has a crucial role in bridging any policy, legal, and

implementation gaps between Member States (MS) under a common policy framework. Therefore, from the point of view of passengers with disabilities an EU transport infrastructure policy is very important.

\*2. In your opinion, what should be the main focus of a transport infrastructure policy at EU level?

(You may choose up to 5 options)

- Establishing physical cross border infrastructures (railways, roads, inland waterways etc.) - selected
- Removing physical and other bottlenecks in the network as a whole
- Facilitating the coherent and continuous EU wide deployment of innovative transport solutions (alternative fuels, intelligent transport systems etc.)
- Ensuring connectivity and accessibility of all regions of the European Union - selected
- Facilitating multimodal transport chains (connecting ports, airports, rail-road terminals etc.) – selected
- Ensuring EU wide quality infrastructure standards - selected
- Improving dual-use (civilian and military) infrastructure
- Enabling the decarbonisation of transport (e.g. by a shift towards more sustainable modes of transport and to cleaner fuels)
- Other – selected, further explained:

It is very important that EU transport infrastructure is accessible to all users. The current Regulation already recognises the importance of accessible transport infrastructure for persons with disabilities, persons with reduced mobility and older persons, through a specific provision on accessibility of the trans-European transport network for all users (Art 37). So, one of the key focus of EU transport policy should be to ensure that current infrastructure is progressively made accessible for a wide diversity of users. Therefore, it is vital that a ‘design for all’ approach is adopted from the onset of designing to final stage of constructing infrastructure. While we appreciate the challenges to improve the accessibility of already existing infrastructure, it is absolutely unacceptable that new inaccessible infrastructure is built using EU funds, i.e. tax payers’ money. Accessibility following a ‘design for all’ approach should be precondition for funding any project under TEN-T.

\*3. Where do you see the greatest need for improvement/development in transport infrastructure policy to cope with the needs of today and of the future?

(Please choose your three most important issues)

- Enabling new transport and mobility solutions
- Further improving continuity of the TEN-T network and enabling a better use of existing infrastructure
- Speeding up the completion of the trans-European transport network
- Eliminating missing links in physical infrastructure (road, rail, inland waterway transport)
- Enhancing multimodal connecting points (ports, airports, rail-road terminals, urban nodes)
- Further advancing EU wide infrastructure standards
- Further improving cross-border connectivity for the transport of passengers and goods
- Stronger coordination between infrastructure development and transport operations
- Other

There are currently around 80 million persons with disabilities living in the EU (16% of EU's population). Additionally, there are more than 200 million persons older than 50 years of age. Given ageing societies, these numbers are going to rise significantly in the coming years, as are the numbers of persons with reduced mobility that travel in Europe. The latter is already a well acknowledged fact among transport providers and infrastructure managers. With this consideration, EU needs a transport policy targeting the needs of all its citizens for the Union to be able to cope with challenges of today and the future. In this regard, clear accessibility criteria and timelines for improving accessibility of infrastructure and preventing further barriers are vital. It is also crucial to ensure more efficient coordination between infrastructure development, transport operations and passengers' representatives.

\*4. What are the main benefits you would expect if infrastructure policy is made and guided at European level?

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Added value of EU-level policy is bridging any policy, legal, and implementation gaps between MS. There are still significant problems

with the rail network interoperability, for example. Railway infrastructure and rolling stock must be made accessible according to Regulation 1300/2014 but the different systems especially of varying platform heights are hampering progress on accessibility for PRM. New accessible rolling stock is often not compatible with the platform height(s) and there is still a gap that is difficult to bridge for wheelchair users. Same is true for multi-modal hubs such as airports. There is still no common EU strategy, policy, harmonised rules or standards on airport accessibility. So, EU money is often used to finance projects that are inaccessible for persons with disabilities. EU-level policy will result in harmonisation of transport infrastructure accessibility policies and standards across MS, which should be enforced through strong monitoring mechanisms.

## B. Form of the TEN-T network

The TEN-T network consists of a dual-layer structure. The comprehensive network represents the basic layer of the TEN-T and includes components for all transport modes – rail, road, inland waterway, air and maritime as well as their connecting points and corresponding traffic information and management systems.

The core network is a subset of the comprehensive network representing the strategically most important nodes and links of the trans-European transport network. It is multi-modal – i.e. it includes all transport modes and their connections as well as relevant traffic management systems. It has been structured using the nodes of highest strategic importance in the EU (urban nodes, seaports, inland ports airports, rail-road terminals) and connecting them to each other, following the corresponding main traffic flows.

The core network corridors are an instrument to facilitate the coordinated implementation of the core network. They cover the most important long distance transport flows on the core network and are intended, to improve cross- border links within the Union. Core network corridors cross at least two borders and involve at least three transport modes.

In this section we would like to hear your opinion on the adequacy of the form of the core and comprehensive TEN-T network to ensure the achievement of the objectives set in the TEN-T guidelines. This concerns in particular:

- Ensuring connectivity and accessibility of all regions of the Union (including remote, outermost, insular, peripheral, mountainous and sparsely populated areas), with the core and comprehensive networks;
- Ensuring coherent and continuous transnational links, without gaps and bottlenecks, for rail, road and inland waterway transport;
- Supporting inner-European and global maritime and air transport through port and airport infrastructure;
- Enabling multimodal transport chains through seamless connections between modes;
- Enabling smooth connections between long-distance and urban/regional transport for passengers and freight, i.e. enhancing "first/last mile legs" from/to origin/final destination;
- Ensuring an optimal interconnection and integration of especially the core network – with a view to high levels of efficiency, sustainability and decarbonisation;
- Connecting the TEN-T with neighbouring countries and where appropriate ensure interconnection and interoperability with other third countries.

\*5. In your opinion, is the core network as designed currently (covering links and nodes), adequate to meet the needs of the transport sector and its users?

- Yes
- No - selected
- No opinion

\*6. In your view, are the TEN-T corridors a suitable tool to complete the TEN-T core network by 2030?

- Yes
- No - selected
- No opinion

7. In your view, is the comprehensive TEN-T network adequate in terms of its required characteristics?

(For each characteristic, indicate: Yes, No or No opinion)

- Safety/Security - no opinion
- Availability/adequacy of alternative fuel infrastructures - no opinion
- Availability/adequacy of multimodal infrastructures – no opinion
- Equipment for automated transport – no opinion

- Equipment for Intelligent Transport Systems and digital mobility solutions – no opinion
- Other – no

Accessibility for persons with disabilities: It is vital that accessibility is emphasized as one of the required characteristics of the comprehensive TEN-T network. Accessibility should be prioritised at equal level to sustainability, environmental-friendliness, safety and security, and other crucial aspects of transport development. Otherwise, the potential and ambition of EU legislation is greatly reduced, as is its tangible impact on the lives of Union citizens.

Therefore a 'design for all' approach to accessibility should be mainstreamed throughout the Regulation in addition to the welcome highlight through Art 37. Provisions that aim to ensure a safe, sustainable, environmentally-friendly and efficient transport network should incorporate accessibility as one of the other equally important aspects serving the objective of TEN-T (inter alia Recitals 2; 29; Art 3.d; Art 3.f; Art 11.3, etc.). This will make sure that TEN-T is truly user-centred and benefits all users equally.

\*7.1. Does the comprehensive TEN-T network ensure appropriate complementarity with the core network as well as sufficient accessibility to all EU regions?

- Yes
- No – selected
- No opinion

Accessibility to all EU's, especially remote regions, is of course very important. In addition, emphasis should be made as regards accessibility of the network infrastructure by all users living in all EU regions. This means, for example, building a bridge to better connect a certain populated area in the EU is important but it is equally important that this bridge is accessible to all users, including those specified in article 37 of the Regulation.

\*8. In your opinion is it sufficiently clear how capacity bottlenecks and constraints are identified from the perspective of a European transport network approach?

- Yes
- No
- No opinion - selected

## C. The features of the TEN-T network

The TEN-T guidelines set certain standards and requirements for the infrastructure on the core and comprehensive network.

In this section, we would like to hear your opinion on the adequacy of the “features” set out in the TEN-T guidelines. This concerns in particular:

- Ensuring interoperability throughout the TEN-T, where appropriate through standardisation;
- Ensuring comprehensive coverage of 'telematics applications' (intelligent transport systems) and other innovative information/communication technologies for all modes and the interconnections between them to use infrastructure most efficiently and to enable high-quality user standards;
- Enabling low carbon and clean transport, as contribution to the EUs Greenhouse Gas emission' reduction objectives (e.g. through refuelling/recharging infrastructure for alternative fuels);
- Enabling the mitigation of noise emissions and other harmful impacts on citizens and the environment;
- Ensuring high levels of safety and security in transport as well as of infrastructure resilience (in view of climate change adaptation and natural and man-made disasters);
- Applying and stimulating innovative technologies and innovative operational concepts (support decarbonisation, enhance safety and security, improve operations and information provision on the network etc.) and thereby contributing to the 'innovation chain' by deploying Research & Innovation results and identifying R&I needs;
- Ensuring accessibility to TEN-T infrastructure for all user groups.

\*9. Are the standards and requirements for all modes of transport (on infrastructure, interoperability, safety etc.) as set out in chapter II of the Regulation complete?

- Yes, they are complete
- They are mostly satisfactory
- **They are somewhat unsatisfactory and lack essential elements**
- No, they are not satisfactory
- No opinion

**It is positive that Article 10(e) notes that general priority shall be given to measures necessary for improving or maintaining the quality of**

infrastructure in terms of “social conditions accessibility for all users, including elderly people, persons with reduced mobility and disabled passengers”. However, it limits this priority with the wording “where appropriate”, whereas this is not the case when it comes to safety, security, efficiency, and climate. Accessibility should be obligatory and addressed with the same level of ambition as safety, security, efficiency, and climate. In fact, accessibility is part of sustainable infrastructure considering the ageing population and the need for adaptations that comes with it. Accessibility for all users is further not mainstreamed in the standards and requirements for the covered transport modes. It should be incorporated in the provisions covering infrastructure requirements and development priorities for all transport modes.

\*10. From your perspective, has the aim of fostering the uptake of alternative fuels and propulsion systems, set in the TEN-T Regulation, been achieved?

- Yes
- No
- No opinion – selected

\*11. In your view, has the aim of stimulating innovative technologies and operational concepts along the TEN-T been achieved?

- Yes
- No
- No opinion – selected

\*12. In your view, has the objective of mitigating noise emissions and other harmful impacts on citizens (accidents, pollution, congestion) on the TEN-T network been achieved?

- Yes
- No
- No opinion - selected

\*13. In your view, has the TEN-T regulation helped to promote modal shift (from road/air to rail and inland waterway transport)?

- Yes
- No
- No opinion – selected

\*14. In your view, has the TEN-T regulation helped to promote a clean and low carbon transport system overall?

- Yes

- No
- No opinion – selected

\*15. In your view, are urban nodes/cities sufficiently integrated in the TEN-T network (in terms of multi-modal connections, last mile passenger and freight connections, possibilities for seamless through-traffic etc.)?

- Yes
- No - selected
- No opinion

Urban nodes and terminals also still lack accessibility and in most EU Regulations urban transport is not considered so there are still large gaps in this regard. On a more specific note, Article 30(d) should be worded as “seamless and accessible connection between the infrastructure of the comprehensive network and the infrastructure for regional and local traffic and urban freight delivery, including logistic consolidation and distribution centres”.

#### D. Infrastructure use

The TEN-T guidelines specifically aim to achieve a better and more efficient use of existing and new infrastructure while increasing the benefits for the users. This concerns in particular:

- Enabling attractive, sustainable and efficient transport and mobility services, in accordance with the needs and expectations of users in the passengers' and freight sectors;
- Strengthening the integration of TEN-T development and transport service-related policy action in fields such as rail freight corridors, promotion of sustainable and innovative freight transport/logistics chains as well as of seamless multi-modal chains for passengers, maritime and air transport;
- Enabling the increased use of 'sustainable transport modes'
- Enhancing the efficiency of infrastructure use/provision through pricing and other appropriate regulatory measures

\*16. In your view, has the aim of enabling attractive sustainable and efficient multimodal transport and mobility services in accordance to users' needs in the freight transport sector been achieved?

- Yes
- Yes, Mostly
- Partly
- No, not at all - selected

- No opinion

Could you please explain briefly your answer?

1000 character(s) maximum

Accessibility of freight transport infrastructure is not at all considered in the Regulation. It is important to appreciate that persons with disabilities have the right to be employed by entities that manage freight transport, for example infrastructure management bodies. This right is not only enshrined in the UN CRPD but is also ensured by EU anti-discrimination legislation. So, all technical equipment, telematic applications, infrastructure control and safety systems, information management systems which associated with freight transport should be accessible.

\*17. In your view, has the aim of enabling attractive sustainable and efficient multimodal transport and mobility services in accordance to users' needs in the passenger transport sector been achieved?

- Yes
- Yes, Mostly
- **Partly – selected**
- No, not at all
- No opinion

Could you please explain briefly your answer?

1000 character(s) maximum

Passenger transport is still not accessible for persons with disabilities. Railway stations lack lifts, airports do not have coherent tactical guiding systems for visually impaired persons, bus stations do not have coherent accessible information systems for deaf and hard of hearing persons, ports lack accessible signage for persons with intellectual disabilities or on the autism spectrum. Some progress was made in the rail sector also thanks to EU Regulation 1300/2014. So, there is partial achievement. Accessibility still need to be strengthened and mainstreamed in the network infrastructure. Furthermore, the Regulation currently considers accessibility as regards end-users, while accessibility should also be ensured in the operation systems of the network (e.g. telematic applications) considering that persons with disabilities have the right to work in transport infrastructure management bodies.

\*18. In your view, has the TEN-T regulation helped to increase the efficiency of infrastructure use and infrastructure provision in the EU?

- Yes
- Yes, Mostly
- Partly
- No, not at all
- No opinion - selected

Could you please explain briefly your answer?

1000 character(s) maximum

## E. Implementation tools

In order to support the implementation of TEN-T policy while involving a wide range of stakeholders and ensuring coherence with other EU instruments a number of implementation tools have been established in the TEN-T guidelines. In this section, we would like to hear your opinion on:

- The suitability of the core network corridors as an implementation instrument
- The coordination between TEN-T implementation and other EU instruments
- The usefulness of the European coordinators in supporting the implementation of the corridors

19. In your view, is there sufficient coherence between the TEN-T policy and other EU policies?

For each other policy, indicate: Yes, No or No opinion

- Structural and cohesion policy – no
- Sustainable urban mobility policy – no opinion
- Environmental policy – no opinion
- Economic/trade policy – no opinion
- Social/employment policy – no
- Cooperation with third countries policy – no opinion

\*20. In your view, is there sufficient coherence between the TEN-T policy and other current and upcoming transport policies objectives/trends (alternative fuels, new mobility patterns, sustainable urban mobility, automation etc.)?

- Yes

- No – selected
- No opinion

\*21. Are you familiar with the European coordinators?

- Yes – selected
- No

\*22. In your opinion, how realistic are the dates for completion of the core network in 2030 and the comprehensive network in 2050?

- Very realistic - selected
- Moderately realistic
- Less realistic
- Not at all realistic
- No opinion

\*23. Have you already used the European Commission's TEN-Tec system?

- Yes
- No – selected

## F. Further information

24. If you wish to add further information or comments - within the scope of this questionnaire - please feel free to do so here.

3000 character(s) maximum

The current TEN-T Regulation recognises the importance of accessible transport infrastructure for persons with disabilities, persons with reduced mobility and older persons, through a specific provision on accessibility of the trans-European transport network for all users (Art 37). It is very important that this provision is retained. We welcome the opportunity to further improve the Regulation by revising the guidelines for the trans-European transport network (TEN-T), to ensure that full accessibility of transport in the EU is achieved and right to Freedom of Movement of persons with disabilities and persons with reduced mobility is fully respected.

In line with its obligations under the UN CRPD and its role to protect and guarantee equal rights of its citizens to Freedom of Movement, the EU

must put accessibility at the core of its transport development policies. Accessibility of the TEN-T Regulation is thus paramount in this regard.

More specifically, the TEN-T Regulation should:

- Make clear reference to the UN CRPD and align language with the terminology and spirit of the Convention (e.g. persons with disability instead of disabled persons);
- Make explicit linkage with other Union accessibility, passengers' rights and public procurement legislation;
- Mainstream accessibility following a 'design for all approach' as defined in the UN CRPD and General Comment No 2 of the CRPD Committee throughout the Regulation, not only as regards passenger but also freight transport in all transport modes and connecting nodes;
- Set accessibility following a 'design for all' approach as defined in the UN CRPD and General Comment No 2 of the CRPD Committee as precondition for funding any projects under TEN-T to ensure that EU funds are not used to create or perpetuate inaccessible infrastructure for persons with disabilities;
- Ensure accessibility everywhere without geographic discrimination against passengers in certain regions of the EU;
- Ensure that the core network covers the entire transport infrastructure eventually and not just selected corridors or lines;
- Give the possibility to cover vehicles in addition to infrastructure to ensure interoperability. Otherwise, a TEN-T project aiming at improving the accessibility of a train station would bring no benefits for the passenger if the trains passing through this station are not made accessible and compatible with the train station;
- Strengthen the provisions regarding monitoring the progress of TEN-T through clear indicators for accessibility of TEN-T infrastructure
- Strengthen enforcement, reporting and remedy mechanisms
- Ensure effective access of persons with disabilities in monitoring, reporting, complaints and remedy mechanisms under TEN-T;
- Ensure accessibility of the EC TEN-Tec for persons with disabilities.

For further details please check the uploaded files.

25. Please feel free to upload a concise document, such as additional evidence supporting your responses or a position paper. The maximum file size is 1MB.

Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this public consultation. The document serves as additional background reading to better understand your position.

The maximum file size is 1 MB

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed