



Mrs Raquel Sánchez Jiménez

Chair of the EU Transport, Telecommunications and Energy Council (Transport)

Minister for Transport, Mobility and Urban Agenda of Spain

Paseo de la Castellana 67,

28071 Madrid

Spain

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Dear Minister,

BusinessEurope recommendations for the trilogues on TEN-T

As you are aware, during Council's mandate negotiations on the revision of the Regulation on the Trans-European Transport Network (TEN-T), the European business community increasingly expressed its concerns regarding the low level of ambition for its design, financing and implementation, which would significantly undermine the ambitious objectives set out in the Commission proposal. The TEN-T is an important enabler for multimodality in transport and logistics in the EU as well as for efficient and sustainable transport and mobility solutions which contribute to economic growth and jobs. Reliable and high-quality cross-border transport infrastructure is key for an effective and quick EU response to crises and emergencies and the TEN-T is proving to be of fundamental importance in terms of safety and economic and supply security interests.

The lack of ambitions regarding several TEN-T provisions in the final outcome or stalling the legislative process would significantly put at risk a proper and efficient implementation of current and future infrastructure projects, further delaying the completion of TEN-T. With this in mind, we would like to draw your attention to the following issues of concern in the ongoing trilogue negotiations on the TEN-T Regulation:

- **Provide adequate funding at EU and national level:** The Council must ensure that ambitions in the framework of the TEN-T Regulation go hand in hand with sufficient funding at EU and national level to fill in existing investment gaps, address missing links at cross-border sections, including reduction of border waiting times for road freight transport, and ensure the development and maintenance of the core infrastructure to guarantee a timely completion of the TEN-T networks. The proposed Article 8(4a) introducing a general exemption clause for the implementation of projects of common interest depending on, *inter alia*, the availability of financial resources, should urgently be removed from the revised Regulation. It is a matter of stating clear priorities and political commitment.
- **Guarantee an ambitious timeline for the TEN-T completion:** Extended deadlines as proposed by the Council – regarding ERTMS deployment (Article 17), road safety-related means (Article 30) or the connection of airports of the core network with the TEN-T, especially by rail (Article 33) – poses a real risk of delaying and stalling the completion of the TEN-T. BusinessEurope has repeatedly stressed the importance of an ambitious timeline, supporting the introduction of a 3-layer



- approach with respective deadlines of 2030 for the core network and 2040 for the extended core network. However, we note with concern that the deadline for the comprehensive network is moved to the very last “second” of 31 December 2050. Instead of further postponing deadlines, Member States should commit to faster development of the network and increased coordination, as we underline further below.
- **Strengthen governance tools:** A reduced role of the European Coordinator in the (investment) planning, monitoring and implementation of infrastructure projects as proposed by the Council (Article 51-53) significantly undermines the coherent deployment and timely completion of the TEN-T. BusinessEurope urges to give the coordinators of the TEN-T corridors effective powers to implement the *agreed* TEN-T plans as well as resources needed to monitor the necessary cost-benefit analyses. Moreover, to guarantee reliable and efficient transport infrastructure, the Commission should be granted a stronger mandate in the financial control and oversight of European transport infrastructure projects to avoid significant delays or a halt of projects of completing the TEN-T (Article 54). It is up to the Council and Member States to agree on the projects, but once agreed there should be a strong oversight of the cross-border projects.
 - **Ensure the availability and development of multimodal freight terminals:** The removal of multimodal freight terminals located within or in the vicinity of an urban node from the Regulation’s scope (Article 35) as proposed by the Council significantly undermines its objective of enhancing multimodality and interconnection of all transport modes, including in urban nodes. As multimodal freight terminals serve as nodes for four transport modes (maritime, rail, road and inland waterways) and fulfil an important role in providing multimodal transport solutions, their infrastructure, efficiency and availability should be further strengthened. It is also a matter of policy consistency with the green transition goals. We therefore further support Parliament’s proposal to connect urban nodes with multimodal freight terminals and facilities by 2030 (Article 40(1), point (c)(iii)).
 - **Address challenges related to safe and secure parking areas:** A “best effort approach” for safe and secure parking areas as proposed by the Council in Article 30(3), including an extension of the distance between such areas from 100km to 150km, is unacceptable. Instead, Parliament’s proposal to establish such areas on the comprehensive network by 2040 and on the core and extended core network by 2030 should form part of the final agreement. Mandating Member States to sufficiently address challenges related to safe and secure parking and rest areas for trucks by 2030 is crucial to guarantee immediate improvements for drivers in the road haulage industry and ensure that the provisions of the Mobility Package I are observed. Lack of commitment in this regard will impede compliance with Mobility Package I obligations.
 - **Ensure further integration of urban nodes:** Urban nodes should ensure a seamless and safe interconnection between all transport modes. Therefore, higher ambitions regarding infrastructure in urban nodes serving commercial vehicles, with references to multimodal freight and logistics terminals as well as passenger hubs, is needed. Moreover, in line with Parliament’s proposal (Recital 51), a coordinated and harmonised approach towards sustainable urban mobility planning (SUMP) should be encouraged to avoid a fragmented implementation and ensure clarity for all stakeholders involved.



- **Guarantee consistency with EU rules on alternative fuels infrastructure (AFIR):** Compatibility of the ambitions set out in the TEN-T guidelines with the one related to the roll-out of alternative fuels is imperative. The market uptake of latest vehicles technologies, including low- and zero emission vehicles, should be fostered by setting mandatory deployment targets for alternative fuels infrastructure in the TEN-T and beyond, accommodating both light-duty and heavy-duty vehicles.

As productive negotiations leading to high ambitions for the TEN-T networks are crucial for the successful implementation of ongoing and future infrastructure projects, we hope that the Council can keep the above issues in mind to help ensure the development of an EU-wide, efficient, reliable, and high-quality transport infrastructure for all modes of transport. We thank you in advance for giving due consideration to our recommendations and stand ready to discuss these issues further.

Yours sincerely,



Markus J. Beyrer