



Central Sweden
DALARNA, GÄVLEBORG OCH ÖREBRO LÄN



Public consultation on Regulation (EU) No 1315/2013 on Union guidelines for the development of the trans-European transport network – Joint position from The Bothnian Corridor Brussels Network

This is a joint position paper of the Finnish, Swedish and Norwegian regional offices around the Gulf of Bothnia, in cooperation with the Bothnian Corridor, on the Public consultation on Regulation (EU) No 1315/2013 on Union guidelines for the development of the trans-European transport network. The EU offices represent the regions of East and North Finland, West Finland, Tampere Region, Helsinki-Uusimaa Region, Central Sweden, Mid Sweden, North Sweden and North Norway.

The Bothnian Corridor Brussels Network (BC BXL) welcomes the northern extension of the Scandinavian-Mediterranean and the North Sea Baltic corridors proposed by the European Commission in the framework of the *Connecting Europe Facility* (CEF) and the possibility of contributing together with other regions and countries to the implementation of the European transport policy. BC BXL looks forward to the future involvement in the corridor cooperation from 2021. BC BXL would like to highlight also the importance of a synchronized implementation and a geographical adaptation of the *Rail Freight Corridors* (RFC) with the core network corridors, to achieve the best possible coordination of the rail freight transports.

Implementation of TEN-T – a holistic approach to the European transport policy

The BC BXL supports the EU transport policy, TEN-T, and sees a great added value in building an interconnected European system rather than separate national transport systems. There is a great strength in coordinated planning at European level and common European standards. Infrastructure investment is a driver for growth, especially in a small, open and export driven economy like the northernmost part of Europe. Connecting the logistic chains of the northern European regions even more to the TEN-T network will enhance the flow of goods in Europe, benefits the European economic growth and strengthens the development of the EU's internal market. Our regions are an important supplier of a variety of crucial raw materials, cleantech, energy and seafood, to mention a few, to the European market. A prerequisite for the supply of Arctic resources to the European market is the improvement of cross-border connectivity for the transport of goods and also of passengers. Through collaboration, we can achieve the jointly set goals towards a more competitive and resource-efficient transport system across Europe. BC BXL advocates multi-level collaboration and a clearer involvement of regional and local level in the preparation of a new forward-looking TEN-T regulation.

There is a need for infrastructure investments both in north-south transport routes to markets within the EU and in east-west transport routes towards Asia, as well as westwards towards the Atlantic and major international markets. The comprehensive network is of key importance for the functionality of the core network. In order to achieve better transport flows throughout the network, one needs, among other things, to make investments at border crossings in the comprehensive network towards third countries, in our case between Finland, Sweden and Norway.

European transport policy faces major challenges. While the investment needs are large, the budget is severely limited and hard prioritisations need to be made in the future. The TEN-T regulation needs to be optimized to achieve the largest European added value. The European transport policy is particularly useful when it is targeted at cross-border infrastructure, removal of obstacles and bottlenecks, the promotion of innovative transport solutions and multimodal transport chains, and by contributing to the phasing out of fossil fuels.

Cost Benefit Analysis (CBA)

According to the TEN-T regulation, projects of common interest must have undergone a Cost Benefit Analysis, CBA, when applying for EU funding. In the European context, Nordic countries are sparsely populated with great distances and infrastructure measures rarely provide the economy required to compete with investments on the continent. The methodology that for example the Swedish Transport Administration applies for CBA:s differs from the one recommended by the European Commission, which is a disadvantage for infrastructure projects, not the least in northern Sweden.

It is important to have a holistic perspective in the infrastructure planning and in planning entire lines instead of shorter individual stretches and distances. BC BXL calls for the possibility to make the CBA:s on entire lines, including cross-border ones. The holistic perspective in the analyses is decisive for more sparsely populated regions in order to obtain accurate evidence and outcomes.

Comprehensive ports

BC BXL believes that it is of key importance to review the methodology for TEN-T and the requirements that exist for the comprehensive and the core network ports. The requirements for becoming a core network node are high, something that disadvantages countries such as Sweden, Finland and Norway with a sparse population structure. With the development of the transport sector, increasing demands are being placed on increased intramodality and interoperability, in order to more easily combine different types of transport and for the transfer of goods from the highly trafficked road network to trains and shipping. This is of significant importance to be able to reduce the transport sector's climate impact.

Coordination and interoperability between core and comprehensive networks should be strengthened to ensure connections to and from the core network with operational transshipment terminals. This should also include more sparsely populated areas, where both ports and terminals have difficulties meeting the current TEN-T criteria. Well-functioning ports are crucial for an efficient transport system. A review of the criteria is needed to better support the ports in the comprehensive network that are and remain important hubs in the transport network. The current regulation presupposes that at least one of the ports in Motorways of the Seas (MoS) projects is a core network port. BC BXL advocates a review of the criteria to provide increased opportunities for ports in the comprehensive network to collaborate with other comprehensive ports, in MoS-projects.

European Rail Traffic Management System (ERTMS)

Development of the on-board equipment for the *European Rail Traffic Management System*, ERTMS, is currently taking place at local level, without cross-border coordination or other larger scale collaborations. The work is done sporadically and without support from government agencies and national authorities. The result is often expensive procurements that rarely include future updates or upgrades. The cost for operators who choose to invest in ERTMS equipment at an early stage is often large. The operators rarely receive any major benefits for these investments, but instead it mainly means large costs for a number of upgrades and re-installations while the system is being developed. In the long run, the costs for the work will be greater than necessary, time scheduling more difficult to manage and the risk of lock-in effects is increasing.

A unified interpretation and a common model for how the EU Member States can reward those who choose to install ERTMS would increase the ability of operators to compete throughout the single European market and reduce the cost of developing the onboard equipment. A better coordination between operators,

infrastructure managers and authorities as well as a common model for support for installation for a complete introduction of ERTMS by 2030 would be welcomed.

Climate dimension

Establishing and enhancing cross-border infrastructure, removing bottlenecks in the TEN-T network, ensuring good connectivity and accessibility, and enabling decarbonisation of the transport sector should be the main focus of a transport infrastructure policy at European level. The transport sector accounts for a large part of the global carbon dioxide emissions and therefore plays an important role in the transition to achieve the goals of the Paris agreement from 2015. There is a great need for European cooperation to achieve a sustainable, efficient and safe transport system. It is crucial that the TEN-T guidelines are adapted to better support a transition of the transport system. The European common transport policy should work towards the phasing out of fossil fuels, something which the current guidelines do not sufficiently support.

BC BXL would welcome incentives for speeding up energy efficient solutions, introduction of alternative propulsion systems and provision of corresponding infrastructures, to enable a decarbonisation of all transport modes to achieve the target of a 60 percent cut in greenhouse gas emissions by 2050 (based on 1990 levels). Our regions are looking forward to active involvement in the corridor cooperation and a timely implementation of the updates of the network, as this will positively contribute to the future development of a green and modern transport sector. Our regions have high goals for sustainable transport and hope to be able to actively seek and provide solutions to achieve the common European targets.