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Public consultation accompanying the Impact Assessment for the Revision of the TEN-T Regulation

A Eurelectric response paper

May 2021

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:
- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

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WG E-mobility (lead)
WG Technology
WG Customers & New Services
WG Regulation & Network Customers
WG RES & Storage
WG Hydro
WG Wholesale Market Design & Investment Frameworks
WG Power & Gas Interactions
Eurelectric *ad hoc* Task Force on TEN E Regulation
Friends of Electromobility

Electrification & Sustainability Committee
Distribution & Market Facilitation Committee

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Open Public Consultation accompanying the Impact Assessment for the revision of the TEN-T Regulation

Fields marked with * are mandatory.

Introduction

Regulation (EU) 1315/2013 on Union Guidelines for the development of the trans-European transport network (TEN-T) governs the EU policy on transport infrastructure. In line with the Action Plan included in the Commission's Communication on the European Green Deal, and the Sustainable and Smart Mobility Strategy, a proposal for a revision of the TEN-T Regulation is planned in 2021. This consultation forms part of the impact assessment that will underpin the legislative proposal for a revised TEN-T Regulation. The objective of this consultation is to ensure that, in addition to the organisations directly involved in the TEN-T policy, other stakeholder groups and the general public are provided with the possibility to express their opinion about the topic.

The impact assessment for the revision of the TEN-T guidelines will be based on a comprehensive evaluation of the TEN-T Regulation that assessed to which extent the current Regulation is suited to address new developments in the field Newer developments are going on in of transport and other policy fields, which interact with TEN-T developments, notably:

- The transport system is undergoing a fundamental transformation towards reducing emissions of air pollutants and decarbonising in the context of a long-term climate strategy and the European Green Deal targeting at bringing down the sector’s CO2 emissions by 90% by 2050 and reducing the overall environmental footprint of transport activities.
- Global transport flows are changing in volume and direction. In addition, a transition to more sustainable transport and mobility patterns and broader application of user and polluter pays principles will change the balance between transport modes and overall transport volumes.
- 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 are changing the EU's "internal transport landscape".
- The wider deployment of automation, digitalisation and clean vehicles and vessels is becoming a reality.The impacts of climate change call for a better resilience of the transport network.
- 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.

This public consultation will support the revision of the current Regulation by gathering the views of stakeholders on possible measures and options for changes to the Regulation. The Commission published on 20th November 2020 an Inception Impact Assessment.

In case of questions and remarks, please contact: MOVE-TEN-T-REVISION@ec.europa.eu

About you

* Language of my contribution

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- Trade union
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* Surname

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mdegache@eurelectric.org

* Organisation name

255 character(s) maximum

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* Organisation size

- Micro (1 to 9 employees)
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A. General questions on Regulation (EU) 1315/2013

1. TEN-T policy guides European infrastructure policy since more than two decades. In light of the developments and challenges outlined above could you please give us your opinion on what should be the main focus of transport infrastructure policy at EU level?
(Please rank the following focus areas with "10" being of highest importance)

	1	2	3	4	5	6	7	8	9	10
* Enabling the decarbonisation of transport i.e. the contribution to a 90% reduction in transport emissions by 2050 in order to achieve climate neutrality overall (e.g. by a shift	○	○	○	○	○	○	○	○	○	◉

towards more sustainable modes of transport and / or to cleaner alternative fuels)										
* Establishing physical cross border infrastructures (railways, roads, inland waterways etc.)	○	○	○	○	○	○	◉	○	○	○
* Removing physical and other bottlenecks in the network as a whole	○	○	○	○	○	○	◉	○	○	○
* Facilitating the coherent and continuous EU wide deployment of innovative transport solutions (intelligent transport systems etc.)	○	○	○	○	○	○	○	◉	○	○
* Ensuring connectivity and accessibility of all regions of the European Union	○	○	○	○	○	○	○	○	◉	○
* Facilitating multimodal transport chains (connecting ports, airports, rail-road terminals etc.)	○	○	○	○	○	○	◉	○	○	○
* Ensuring EU wide quality infrastructure standards	○	○	○	○	○	○	○	○	◉	○
* Improving dual-use (civilian and military) infrastructure	○	○	○	○	◉	○	○	○	○	○
* Ensuring the reduction of environmental costs related to transport, such as biodiversity loss, air pollution or noise	○	○	○	○	○	○	○	○	○	◉
Other, please specify below	○	○	○	○	○	○	○	○	○	◉

1.a Please specify:

For future regulation revision, requirement should integrate alternative fuels (for all modes) and enable further digitalisation / automation of transport as well as better capture urban nodes.
It is important to accelerate the deployment of recharging infrastructure where persistent gaps exist, for urban and suburban agglomerations and in the TEN-T core network corridors. MS should design EV charging infrastructure, considering not only the number of chargers, but also the different use cases.

B. Measures enabling the decarbonisation and the reduction of air pollutant emissions in the transport system (e.g. through seamless infrastructure connections, service continuity and performance)

In the context of the European Green Deal, several pieces of legislation are being reviewed to ensure they will help deliver on the increased climate action ambition and the near zero pollution ambition of the EU. This revision of the TEN-T Regulation will be built on the Strategy on sustainable and smart mobility putting

transport firmly on the path of bringing down the sector's CO2 emissions by 90% by 2050 and reducing the overall environmental footprint of transport activities.
The TEN-T network consists of the comprehensive and core network layers which result from a single European planning methodology. It covers rail, road and inland waterway links as well as ports, airports and other multi-modal terminals. Furthermore, it has a strong link with urban transport where most of the traffic on the TEN-T has its origin or destination.

For all infrastructure of the TEN-T comprehensive network, Regulation (EU) 1315/2013 defines a wide range of quality requirements – valid for existing and newly built infrastructure. Such requirements reach from interoperability or safety standards pursuant to the corresponding legislation in rail or road transport to equipment or connectivity requirements for terminals or to intelligent infrastructure components to enable 'telematics' solutions and enhance the efficiency of cross-border transport services.

The TEN-T core network (as a part of the comprehensive network) is of highest importance for major international transport flows and for a balanced interconnection of all EU regions. It interconnects the major cities and transport nodes as economic centres and key transhipment hubs, and it features higher quality and capacity standards than the comprehensive network.

2. The evaluation of the TEN-T Regulation has confirmed that the design structure of the TEN-T network should be maintained in accordance with the existing network planning methodology. However, it also calls for the possibility to introduce minor adjustments to the network.

In this regard, please rate your level of agreement with the following statements:

	Completely disagree	Somewhat disagree	Neither agree nor disagree	Somewhat agree	Fully agree	No opinion
* Network design needs to be adjusted to take account of changing transport flows within the EU and with neighbouring/3rd countries	○	○	○	○	◉	○
* Network design needs to be adjusted to further strengthen accessibility for all regions and cross border mobility	○	○	○	○	◉	○

2.a If you fully or somewhat agree! What type of adjustment would you deem most necessary?

500 character(s) maximum

TEN-T regulation revision should strengthen sustainable and multimodal transport, focus on modal shift and sustainable fuels, with urban areas incentives to increase urban nodes number.

The future framework should maintain 2030 targets for the Core Network completion and 2050's for comprehensive network. A focus is needed on the TEN-T Comprehensive Network.

Support full ERTMS deployment on the network is a first step to digitalise railway operation and its performance improvement (ATO).

3. The evaluation of the TEN-T Regulation has shown that the existing infrastructure requirements remain relevant and have strengthened the role of the TEN-T as enabler of an integrated, efficient and sustainable transport system. However, it also revealed shortcomings in view of the objective to decarbonise the transport sector. This is specifically the case in relation to the provisions on urban nodes, certain quality requirements for rail, road and inland waterways, the maritime dimension of TEN-T as well as to the optimised integration of all modes.

In this regard, please rate your level of agreement with the following statements:

	Completely disagree	Somewhat disagree	Neither agree nor disagree	Somewhat agree	Fully agree	No opinion
* The TEN-T needs further enhancement to enable future decarbonisation and further reductions of air pollutant emissions of EU transport	○	○	○	○	◉	○
* Synergies between energy (including TEN-E) and transport infrastructure (TEN-T) policies need to be strengthened to enable future decarbonisation and further reductions of air pollutant emissions of transport	○	○	○	○	◉	○
* Binding requirements for recharging and refuelling infrastructure for zero and low emission vehicles and vessels for all transport modes should be introduced in TEN-T policy	○	○	○	○	◉	○
* The TEN-T should promote a high performance rail passenger network to improve service quality on the network	○	○	○	◉	○	○
* The coordination between TEN-T core network corridors and Rail Freight Corridors should be further enhanced to increase service performance on the network	○	○	○	○	○	◉
* New requirements for road safety (i.e. safe and secure parking) should be introduced in the TEN-T	○	○	○	○	○	◉
*						

The revised TEN-T Regulation should incorporate further requirements to strengthen inland waterway transport in view of its contribution to shifting freight transport to more sustainable modes	○	○	○	◉	○	○
* The revised TEN-T Regulation should incorporate further requirements to strengthen short sea shipping in view of its contribution to shifting freight transport to more sustainable modes	○	○	○	◉	○	○
* The provisions for urban and transport nodes should be strengthened to achieve better multi-modal services for passengers and freight and to facilitate last mile connections including where appropriate connections with active modes such as cycling, walking and other sustainable urban mobility solutions	○	○	○	○	◉	○

3.a Please mention any specific adjustment that you might deem necessary in any of the areas above

500 character(s) maximum

TEN-T should be considered in synergy with TEN-E&AFID
Binding (periodically revisable) requirements concerning recharging infrastructures are needed but only for deployment of stations & not technical requirements. Also, a uniform methodology is decisive but taking into account MS' particularities.
Support energy storage solution & ultra-fast charging points is needed to reduce local grids stress. Better urban nodes & digitalization needs are crucial as well as onshore power supply incentive

4. In your view should certain infrastructure requirements/conditions set for the core network be equally applicable to the comprehensive network?

	Yes	No	No opinion
* Requirements for alternative fuels	◉	○	○
* Requirements on road safety and quality	○	○	◉
* Requirements for intelligent and digital TEN-T components	◉	○	○
* Requirements for railway infrastructure interoperability incl. ERTMS	○	○	◉
* Requirements for transport and urban nodes	◉	○	○
Other requirements (please specify)	◉	○	○

4.a Please specify other requirements

500 character(s) maximum

The future framework should take into account the economic impact and Regulatory stability risk of further changes in the Technical Specifications for Interoperability (TSIs) and plan for transition rules in line with the asset life in the industry.

4.b If Yes, what type of requirements/conditions would you deem most necessary to be extended from the core to the comprehensive network?

500 character(s) maximum

The future regulatory framework should promote sustainable fuels (for all transport modes) and electric charging infrastructure full coverage on urban nodes and both TEN-T Core and Comprehensive Networks. To guarantee intelligent services for EVs and charging infrastructure progress, transport infrastructure digitalization should apply on TEN-T network overall and ensure an equal access to EV charging infrastructure data.

5. The implementation of the TEN-T core network is facilitated through a number of implementation instruments such as the core network corridors, the European Coordinators, their work plans and corridor fora involving a large number of stakeholders. Furthermore, the Commission, with Member States' approval, has the possibility to draw up Implementing Acts for the cross-border and horizontal dimensions (ERTMS, MoS) of the core network corridors. The evaluation of the TEN-T Regulation found that the TEN-T core network is overall progressing well; it also identified a number of risks with a view to the timely completion of the network and called for the strengthening of EU instruments in this respect.

In your view should the current instruments in the Regulation aimed at facilitating and accelerating the completion of core network projects be reinforced?

	Completely disagree	Somewhat disagree	Neither agree nor disagree	Somewhat agree	Fully agree	No opinion
* The role of the European Coordinators should be strengthened (i.e. more binding nature of work plans, enlarged mandate to cover fields such as alternative fuels and digitalisation etc.)	○	○	○	◉	○	○
* Increased use of implementing acts (for implementing corridors, sections, projects)	○	○	○	◉	○	○
* Improved alignment of EU and national planning and implementation procedures	○	○	○	○	◉	○
* Improved reporting mechanisms of TEN-T implementation status	○	○	○	○	◉	○

5.a Please mention any specific adjustment that you might deem necessary in any of the areas above or any other adjustment you deem necessary to strengthen TEN-T implementation instruments

500 character(s) maximum

We support the reinforcement of all implementation instruments to avoid delays that are, in the current projects, beyond normal level in most of the TEN-T sites. In addition to proposed instruments, monitoring on Member States implementation of the TEN-T guidelines should be increased. Rail investments with CEF 2 funding should be boosted in order to achieve the TEN-T 2030 and 2050 deadlines. Moreover, blending of funding from different levels of government is crucial.

6. In your opinion, should the implementation of the TEN-T network (in particular, through transport infrastructure projects) give consideration and/or contribution to the following plans (please rank the three most important plans for you):

	1st	2nd	3rd
National Energy and Climate Plans	◉	○	○
National Air Pollution Control Programmes / Air Quality Plans	○	◉	○
Noise plans	○	○	◉
River Basin Management Plans	○	○	○
Other plans, please specify	○	○	○

C. Measures related to infrastructure quality and resilience

Climate change and with it the increasing occurrence of extreme weather events puts new challenges to transport infrastructure and make it necessary to adapt it to these new circumstances. Furthermore, recent accidents such as the collapse of the bridge in Genoa have put the structural quality of our infrastructures in question and call for a new approach with regard to inspections and maintenance. Crises such as the Covid-19 pandemic have in addition shown the importance of seamless transport chains to ensure civil protection and open supply routes during such events. Lastly, to ensure open access to infrastructure facilities and services considerations should be made on foreign ownership.

7. In your view should the TEN-T network infrastructure be made more resilient by introducing certain new quality parameters/ requirements related to:

	Completely disagree	Somewhat disagree	Neither agree nor disagree	Somewhat agree	Fully agree	No opinion
* Climate adaptation (inland waterways, coastal road and rail infrastructures etc.)	○	○	○	○	◉	○
* Structural infrastructure quality (e.g. bridges and tunnels)	○	○	○	○	◉	○
* Civil protection (e.g. crises preparedness, accidents or other natural and man-made disasters)	○	○	○	○	○	◉
* Security or public order (e.g. military mobility, investment screening, foreign ownership e.g. of ports and terminals)	○	○	○	○	○	◉

7.a In your view, are there other measures concerning infrastructure quality and resilience that could be considered?

500 character(s) maximum

Cyber-threats is an area of concern for railways which have complex interdependences and legacy infrastructure. Electrification and smart mobility must be considered in light of the cyber security threat that comes along, taking into account the increasing interdependency of the various components and actors of the EU interconnected power system. The TEN-T revision should incorporate the key elements of the forthcoming new EU ‘’Cybersecurity strategy’’.

7.b If you agree or fully agree to any of the categories above, in your view how should this be ensured?

500 character(s) maximum

D. Measures related to innovation, digitalisation and automation

Digitalisation of the transport sector will be a major building block in the efforts to decarbonise the transport sector. It will not only allow for a more efficient use of the existing infrastructure but also help to improve user services in freight and passenger transport (i.e. last mile connections, integration of modes etc.). Digitalisation is furthermore key in the automation of the different transport modes. In this area, the distinction between classical infrastructure (rail, road, waterways etc.), mobile assets (vehicles) and data (needed to use the infrastructure or generated by using it becomes more and more blurred. Last but not least TEN-T in the past has been an enabler and test bed for the uptake of innovations in the transport sector that later on have become mature technologies deployed on a large scale (e.g. ERTMS). With many new innovations on the horizon (drones, vacuum tube trains etc.) this role of TEN-T will need to be ensured for the future.

8. The evaluation of the TEN-T Regulation has found that the way digitalisation is currently defined and underpinned by specific targets in the Regulation is not sufficient anymore to contribute to the objective of decarbonising the transport sector and to enable automation. It has furthermore found that more attention needs to be given to a proper balance between fixed / long-term infrastructure requirements and fast progressing developments building strongly on industrial innovation.

In this regard, please rate your level of agreement with the following statements:

	Completely disagree	Somewhat disagree	Neither agree nor disagree	Somewhat agree	Fully agree	No opinion
* The requirements for intelligent and digital TEN-T components set in the TEN-T Regulation should be adjusted (e.g. by integrating relevant EU-wide provisions and plans adopted since 2013, for example in fields such as the European Rail Traffic Management System -ERTMS or in Intelligent Transport Systems - ITS in the road sector).	○	○	○	○	◉	○
* The TEN-T Regulation should better define the digital components (hardware /infrastructure, vehicles/mobile assets/data) of the different modes of transport as to strengthen its role as an enabler of innovative, sustainable and efficient user services.	○	○	○	○	◉	○
* TEN-T infrastructure (roads, rails, inland waterways etc.) needs to be further enhanced (through additional hardware e.g. sensors, or software e.g. security systems, network capacity etc.) to enable future automation of transport.	○	○	○	○	◉	○
* The revision of the TEN-T Regulation should ensure a forward-looking framework with flexibility to integrate upcoming innovations (drones, vacuum tube trains etc.) in the transport sector.	○	○	○	◉	○	○

E. Possible focus of policy options

9. In the framework of the Impact Assessment, the Commission will test a number of policy options for a revised TEN-T Regulation. They will include all / some of the measures enquired about in the questions above. The policy options and measures contained therein will be assessed against a baseline scenario in which the current Regulation remains in force unchanged. In the following we present three focus areas for possible policy options. Please rank them from the, in your opinion, most to the least suitable in order to achieve the objectives set out above.

Focus Area 1: Major emphasis on a "traditional" infrastructure development concept, with necessary network design adjustments and the updating of essential infrastructure quality requirements in line with the current TEN-T policy approach. This should include the integration of binding requirements for recharging and refuelling infrastructure for low and zero emission vehicles and vessels, based on Directive 2014/94/EU on Alternative Fuel Infrastructure and its ongoing revision as well as other relevant initiatives. This is expected to be a high cost approach, with an important contribution to transport decarbonisation thanks to the enabling of large-scale deployment of clean vehicles and vessels.

Focus Area 2: Strengthening the concept of infrastructure quality, for the double objective of a) enabling more efficient and sustainable transport services and modal distribution in line with new ambitions of transport policy overall b) ensuring a more resilient TEN-T, in the light of climate change, safety, security, military mobility and civil protection challenges. Besides the effects of alternative fuel infrastructure, this approach is expected to make significant additional contributions to decarbonisation, thanks to substantial efficiency gains in the transport system overall. Furthermore, it is expected to increase gains in fields such as security or disaster preparedness.

Focus Area 3: Boosting digitalisation and innovation in TEN-T policy. Compared to the previous areas of focus, this one approaches "decarbonisation" from a different angle, namely by giving highest priority to digital and other innovative solutions. Focussing in particular on smart and soft solutions, it is expected to be a cost-efficient approach, with a strong potential for efficiency enhancements of the transport system as the main path towards its decarbonisation. Not least, it entails immense opportunities for the generation of new jobs and for a strong link between Research & Innovation and TEN-T policy.

Focus Area 4: a combination of different elements from the Areas above.
Please explain below

Focus Area 5: none of the above
Please explain below

Please rank them from the, in your opinion, most to the least suitable in order to achieve the objectives set out above.

	1st	2nd	3rd	4th	5th
Focus area 1	○	◉	○	○	○
Focus area 2	○	○	○	◉	○
Focus area 3	○	○	◉	○	○

Focus area 4	◉	○	○	○	○
Focus area 5	○	○	○	○	◉

Focus area 4, please specify:

500 character(s) maximum

The future regulatory framework for TEN-T should be done in the traditional approach of focus area 1, which is the decarbonization of transport systems through the deployment of zero emission vehicles, and by integrating infrastructure quality requirements as proposed in policy focus 2. In complement, a focus should be done on digitalization and automation as proposed in policy focus area 3. Thus, we need to be more courageous on funding, with blending funding from different government level.

Focus area 5, please specify:

500 character(s) maximum

Further information

10. 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

Question 8: although we agree that TEN-T should better define the digital components, any definitions should be consistent with other upcoming legislations on digital.
Recharging infrastructure need digital and smart infrastructures, both electric and telecom, to benefit the consumer who can access open and interoperable services. Specific for the development of charging infrastructure, one should not limit oneself to the provision of infrastructure, but also include key aspects such as sector coupling, the network perspective and advancing digitization. E-mobility connects two previously separated sectors of energy supply and transport. By linking them, vehicles become an elementary component of the energy transition and help the transport sector achieve its CO2 targets. Both can only be achieved through intelligent integration/control, which not only increases customer friendliness but as well prevents inefficient and expensive network expansion. Thus, the digital transformation and potential upgrade of Europe's electricity grid infrastructure must be part of the overall consideration and funding.
Funding and subsidies are vital to support the deployment of EV charging stations for HDV and sustain a viable business case, as high-power charging stations for HDV, in particular on TEN-T corridors, will require from design to implementation, the participation of electricity providers, DSOs & TSOs, CPOs and possibly the integration of additional solutions, such as storage and/or local intermittent RES generation, to minimize the need for significant investments in grid reinforcement.
TEN guidelines (Transport, Energy and Communication) must foster the creation of the desired synergies in this purpose. A close cooperation between the electricity network (i.e. DSO) and the recharging infrastructure development plan, in addition to dedicated support measures for the upgrade of electricity infrastructure, is paramount and allows to optimize the distribution grid reinforcement and a seamless deployment of recharging infrastructure both in the mid-term and in the long-term.
TEN-T guidelines must also be aligned and consistent with carbon neutrality by 2050 and the EU's climate

ambition:
It should address the need to increase the number of urban nodes and accelerate the coordination between MS for cross-border charging. To do this, stakeholders should be more involved in the promotion of EV charging infrastructure in urban nodes by continuing to enhance the Sustainability Urban Mobility Plans.
The principle of corridor could also be reassessed considering national needs in order to ensure the full and appropriate coverage of all MS with charging infrastructure. The deployment of charging infrastructure should therefore go beyond the main axes defined at EU level.
On-shore power supply (OPS) should be explicitly included in the list of priorities for maritime and inland infrastructure development as it is key to mitigate GHG emissions in the harbor

11. 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.

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

Useful links

Regulation (EU) No 1315/2013 of the European Parliament and of the Council of 11 December 2013 on Union guidelines for the development of the trans-European transport network (https://eur-lex.europa.eu/legal-content/E /ALL/?uri=CELEX:32013R1315)

Roadmap on the evaluation of Regulation 1315/2013 (https://ec.europa.eu/info/law/better-regulation/have-your-sa /initiatives/1908-Trans-European-transport-network-Guidelines)

Inception Impact Assessment on the revision of Regulation (EU) 1315/2013 (https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12532-Revision-of-Regulation-on-Union-guidelines-for-the-development-of-th trans-European-transport-network-TEN-T-)

Trans-European transport network planning methodology (https://ec.europa.eu/transport/infrastructure/tentec /tentec-portal/site/brochures_images/web_methodology.pdf)

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