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

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

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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
- ⦾ Important
- ⦾ Somewhat important
- ⦾ Not important
- ⦾ No opinion

Could you please explain briefly your answer?

1000 character(s) maximum

> EU transport infrastructure policy is crucial to ensure that transport infrastructure & policy contributes to enhancing the connectivity & accessibility of outermost & peripheral regions.
>
> In parts of the Western Region of Ireland, geographic peripherality is compounded by relatively poor transport infrastructure which militates against effective participation in the EU Single market. This will be exacerbated further after Brexit.
>
> EU transport policy is critical to support the transport needs to peripheral island member states such as Ireland & its Western Region. The Irish Exporters Association has noted that the transport needs of exporters in the West & Mid-West would be better served by ports & airports located there.
>
> EU infrastructure policy is also important because of the changing role of ports. E.g, the Port of Galway is a strategic hub for the uptake of renewable energies.TEN-T plays an instrumental role in supporting investment in infrastructure.

* 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)

at most 5 choice(s)

- ☐ 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 (alternative fuels, 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
- ☑ Enabling the decarbonisation of transport (e.g. by a shift towards more sustainable modes of transport and to cleaner fuels)
- ☐ Other

* 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)

between 3 and 3 choices

- ☐ 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

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

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> One of the benefits will be to support, guide & enhance member states' transport policy, In Ireland's case some aspects need to be revised in order to support the broader policy framework of Project Ireland 2040. E. g. the sectoral National Ports Policy (2013) & National Aviation Policy (2015) were devised well before publication of Project Ireland 2040 which seeks to balance growth more effectively across Irish regions & will need regional transport investment to enable this. This will require EU support for funding.
>
> In view of the cross-border nature of transport infrastructure, policies & subsequent investments should be harmonized in order to address existing bottlenecks to keep the Union accessible and competitive. This is very important in view of Brexit for Rep. of Irl & N. Irl.
>
> A coordinated approach at EU level is the most effective way to address challenges such as the transition to a carbon-neutral economy & the subsequent investment in the required infrastructure.

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
- ○ 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
- ○ No opinion

7. In your view, is the comprehensive TEN-T network adequate in terms of its required characteristics? (You may choose as many options as you consider appropriate)

	Yes	No	No opinion
Safety/Security	○	◉	○
Availability/adequacy of alternative fuel infrastructures	○	◉	○
Availability/adequacy of multimodal infrastructures	○	◉	○
Equipment for automated transport	○	○	◉
Equipment for Intelligent Transport Systems and digital mobility solutions	○	○	◉
Other	○	◉	○

If other, please specify

> The comprehensive TEN-T network is not sufficiently connected with the core network since there still exist missing links. The current network also does not serve all EU regions, including the North Western region of Ireland, whose importance will grow in the face of Brexit and the uptake of renewable energies.
>
> There is concern that designation on the Comprehensive network, compared to the Core, provides for less access to TENT funding. In the context of peripheral regions such as the Western Region of Ireland where there is a 'need to ensure connectivity & accessibility of all regions in the Union', it is important that designation does not alter the level of funding available.
>
> The inclusion of Shannon and Ireland West Knock airports and ports such as Galway & Killybegs as nodes is important in the context of the Atlantic Economic Corridor which extends from Letterkenny/Derry south to Limerick & Kerry.

*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
- ○ No opinion

If no, please specify

500 character(s) maximum

> The EU Designation on the core TEN-T network, as currently defined on the island of Ireland, extends from Belfast to Dublin to Cork with a connection to Shannon Foynes port.
>
> Given its peripherality, the WDC would like to see the transport links north of Shannon Foynes, and particularly from Galway north to Sligo and Letterkenny (the Atlantic Economic Corridor - AEC) to be included in those TEN-T classifications which provides for the maximum sources of funding support from the EU.

*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

If no, please explain how it could be improved!

1000 character(s) maximum

> There is a need to join existing networks together & complete 'unfinished sections'. The priority should be to improve the outstanding road sections between Tuam & Sligo as this is a key element of the Atlantic Economic Corridor (AEC) and part of Irish Government policy. This network is even more important in the context of Border traffic and Brexit and the peripherality of the North west.
>
> Also, the WDC urges the European Commission to take into consideration the added economic value of airports & ports, such Shannon & Knock airports & the further development of the Galway inner port & its future potential o to play a key role in the development of renewable energies and alternative fuels.

In that context of Ports, the "200 km radius" requirement (article 20, 2D) is too static & does not reflect geographical and economic realities. E.g., the Port of Galway is the last port of call serving more than 1,000 km of the Northwestern coastline of Ireland.

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

Could you please explain your answer?
1000 character(s) maximum

The current TEN-T planning methodology does not specify in detail the requirements ports have to meet in order to be included in the comprehensive and core network. For example, it is not defined in detail what is a "sole point of access" (article 20, 2C), or what defines "passenger traffic volume" (article 20, 2A).

The "200 km radius" requirement (article 20, 2D) is too static & does not reflect geographical and economic realities. For example, the Port of Galway is the last port of call serving more than 1,000 km of the Northwestern coastline of Ireland.

* 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

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

- ○ Yes
- ○ No
- ◉ No opinion

* 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

* 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

If no, please specify

1000 character(s) maximum

> Beyond the TEN-T core designation in Ireland, other parts of the primary national road/ rail network (such as from Cork to Galway to Sligo and Letterkenny) are designated as part of the comprehensive network & so have been excluded from this funding source.
>
> In the absence of investment, the relative standard of a transport network vis a vis another transport network which does attract funding is a relative disimprovement & therefore therefore the region experiences a relative disadvantage in access. This should not be the effect of policy.
>
> While the TEN-T has played a role in promoting a modal shift, it has missed opportunities to fully take advantage of the role of ports , airports & railway transport. E.g the link between the Port of Galway and the existent railway infrastructure was not used. Port, airport & railway infrastructure should have been considered as an integral part of the TEN-T since the combination plays a key role in facilitating the multimodal logistic chain.

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

- ○ Yes
- ○ No
- ◉ No opinion

* 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
- ○ No opinion

If no, please specify

1000 character(s) maximum

> Urban nodes/cities which are closely linked to a port area are currently not sufficiently integrated in the TEN-T network. Ports & airports can be a catalyst for the development of the region and thus require sufficient integration with their hinterland.
>
> International air access points are very important to the development of the AEC. The WDC believe Shannon & Ireland West Knock airports should be included as nodes.
>
> The inclusion of the Port of Galway in the TEN-T comprehensive network will have a significant impact on the port's expansion and inner-city development. The inclusion would open doors at national & EU level to unlock private and public investment that can stimulate the expansion of the port, allowing the further development of the economic development and movement of citizens, goods and services in the Northwestern region.
>
> In the context of the AEC and Brexit, Sligo & Letterkenny should be included as urban nodes.

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
- ○ No opinion

Could you please explain briefly your answer?

> In view of capacity constraints at Dublin Airport there should be efforts to fully utilise the international aviation capacity, air freight services & the state investments already made at airports such as Shannon, as well as Ireland West airport Knock. The Irish Exporters Association has reported that exporters in the West & Mid-West would be much better served from the ports and airports there rather than at Dublin.
>
> The Western Region's many valuable marine assets are relatively under-developed. The port facilities at Galway & Killybegs & Sligo are critical to supporting potential in seafood products, tourism, amenity, ocean renewable energy & marine innovations for the lifesciences sector & need to be enhanced.
>
> Freight facilities at ports, railway depots & interurban road/motorway junctions should be safeguarded & invested in. Brexit will likely lead to new freight transport routes which need to be supported.

* **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
- ● No, not at all
- ○ No opinion

Could you please explain briefly your answer?

> Despite overall passenger growth, there is an ever increasing share of passengers travelling through Dublin airport which is in part due to the investment in motorway access there.
>
> There is un-used capacity available for international access at Shannon & Ireland West Airport Knock which have received significant state support over decades. Improved services at these airports will reduce the need for residents in regional locations to avail of services at Dublin Airport which in turn will reduce journey numbers through an already congested Greater Dublin Area.
>
> These airports provide efficient access both to & from the region to destinations in the UK, Europe and the US vital to supporting the various businesses across the region as well as tourism access. Shannon Airport is particularly important to the Limerick, Shannon and Galway regions and is the only airport on the Western seaboard with hub connectivity via London Heathrow. It also offers pre-clearance facilities to the US.

* **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

Could you please explain briefly your answer?

In an Irish context there is an increasing concentration of traffic through Dublin Port and Airport which in turn demands additional new investment to allow expansion of services. Meanwhile there are port and airport facilities, as well as road and rail capacity with much spare capacity which could service existing and new demand.

EU policy should more effectively support member states to capitalise on the capacity already available and 'sweat' the state investment already made, such as the rail network, port facilities in the Western Region including Galway and the international airports such as Shannon and Ireland West Airport Knock.

This is important as this is consistent & supportive of the overarching policy framework of Project Ireland 2040 which aims to support greater population growth in the West and South rather than in the already congested East (Greater Dublin Area).

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?

	Yes	No	No opinion
Structural and cohesion policy	○	●	○
Sustainable urban mobility policy	○	●	○
Environmental policy	○	●	○
Economic/trade policy	○	●	○
Social/employment policy	○	●	○
Cooperation with third countries policy	○	○	●

*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
- ○ No opinion

*21. Are you familiar with the European coordinators?
- ○ Yes
- ●

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
- ○ Moderatly realistic
- ○ Less realistic
- ○ Not at all realistic
- ● No opinion

* 23. Have you already used the European Commission's TEN-Tec system?
- ○ Yes
- ● No

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

Transport policy is an important tool of economic policy. In Ireland there is a Government policy commitment to rebalance growth away from 'business as usual@ and to support greater population growth in the regions including the West & North West. For this to be achieved there needs to be investment in transport infrastructure especially along the Atlantic Economic Corridor. The WDC believes that EU support and TENT-T classification can help in delivering greater investment in transport infrastructure along this corridor.

In an Irish context there is an increasing concentration of traffic through Dublin Port and Airport which in turn demands additional new investment to allow expansion of services. Meanwhile there are port and airport facilities, as well as road and rail capacity with much spare capacity which could service existing and new demand.

EU policy should more effectively support member states to capitalise on the capacity already available and 'sweat' the state investment already made, such as the rail network, port facilities in the Western Region including Galway and the international airports such as Shannon and Ireland West Airport Knock. This is especially as this is consistent & supportive of the overarching policy framework of Project Ireland 2040.

The Port of Galway has the ambition to be included in the comprehensive network and form a strategic link in the North Sea Mediterranean corridor in order to support the objectives of the EU's transport network. The inclusion of the port in the TEN-T comprehensive network will have a significant positive impact on its expansion plans and subsequent inner-city development.

Beyond the core designation in Ireland, other parts of the primary national road/ rail network (such as from Cork to Galway to Sligo and Letterkenny) are designated as part of the comprehensive network and so have been excluded from this funding source. Additionally, in the absence of investment, the relative standard of a transport network vis a vis another transport network which does attract funding is a relative disimprovement & therefore therefore the region experiences a relative disadvantage in access. This should not be the effect of policy.

In view of Brexit, and potential 'Third country status for the UK & Northern Ireland, peripherality of Ireland should not become an obstacle and should not lead to a lack of competitiveness. The existing transport

infrastructure across the WDC region, including the key ports, airports, the road and rail network should be recognized as an important contributor to enhancing the social, economic and territorial cohesion of the EU. The inclusion of these nodes and networks in the comprehensive network would provide access to funding need to develop infrastructure that enhances the accessibility and competitiveness of the Western region, Ireland, and ultimately, the Union.

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

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