

Cefic position on the TEN-T guidelines revision (COM (2021) 812)

The proposal for a Regulation on Union Guidelines for the Development of the Trans-European Transport Network¹ is an important step to speed up and improve the development of a safe, reliable, and efficient TEN-T network. The chemical industry supports the measures which aim for improved infrastructure standards, more harmonisation for a seamless network, closure of missing links and improved overall network performance.

Cefic attaches great importance to the following aspects and wants to share feedback for further consideration in the finalisation of this important regulation.

European Transport Corridors

Cefic supports the creation of European Transport Corridors (ETC), merging the Core Network Corridors and Rail Freight Corridors. We expect this to increase synergies between infrastructure planning and the operation of transport, which is essential for reliable traffic and capacity management. We also support that Member States consider the security and resilience of the transport infrastructure to climate change, natural hazards, human-made disasters, and other disruptions affecting the functioning of the Union transport system, when planning infrastructure. Therefore, we agree that the ETCs should also include important diversionary lines which can be used in case of congestion or other problems on the principal routes. ETCs should also help to develop the infrastructure of the TEN-T to remove or reduce bottlenecks, enhance cross-border connections, and improve efficiency and sustainability.

Cefic agrees with the general priorities for the ETCs stipulated in Article 13 to measures that are necessary for:

- (a) the development of a high performance and fully interoperable rail freight network across the Union;
- (b) the development of a seamless inland waterways and maritime infrastructure system;
- (c) the development of a safe and secure road network, with sufficient alternative fuel infrastructure;
- (d) the development of improved multimodal and interoperable transport solutions;
- (e) the intermodal integration of the entire logistics chain, interconnecting efficiently in the transport and urban nodes; and

¹ Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on Union guidelines for the development of the trans-European transport network, amending Regulation (EU) 2021/1153 and Regulation (EU) No 913/2010 and repealing Regulation (EU) 1315/2013

- (f) the deployment of the necessary infrastructure to allow for a seamless circulation of zero-emission vehicles.

Rail Transportation - Operational requirements for the European Transport Corridors

To attract shippers and achieve the EU shift to rail target, improvement of reliability and punctuality should be the number one priority. Therefore, Cefic strongly supports Article 18, stipulating that a) technical, operational, and procedural requirements at border crossings should not exceed a total dwelling time of 15 minutes and b) at least 90% of the international freight trains arrive as scheduled or with less than 30 minutes delay.

However, to monitor progress in achieving the above targets, an efficient and effective monitoring system is needed in the whole Union, based on the definition of a uniform punctuality KPI. A neutral body should be appointed, accepted by all relevant stakeholders, to carry out the monitoring and to report directly to the European Transport Corridor Coordinator or its designated caretaker.

When it comes to maximizing punctuality and reducing delays, as mentioned in article 18.b, it should be specified that delays must be calculated along the entirety of a train journey and not only via national assessments within each of the Member States crossed during a single journey.

Freight train punctuality levels are currently 10–30 % below the 90% target and a common understanding is necessary to drive improvements. Therefore, it would be best practice to assess the root causes of delays with a harmonized set of delay causes. This would facilitate comparable reporting and deduction of corrective actions. A combination of this approach with the Collaborative Decision Making (CDM) approach, which is successfully practiced by the airline industry and currently discussed by the rail sector (R-CDM), would provide a powerful improvement process to the programme.

Rail Transportation - Requirements for Infrastructure Management

Increasing the reliability and punctuality of rail services in Europe is key for future sustainability of logistics and for efficient intra-mode transports, but this can only be achieved through investments in new rail infrastructure which is not meeting today's capacity (demand) nor technical requirements.

These infrastructure works (maintenance and new projects) are expected to continue to reduce network capacity significantly and notably, during the decade(s) ahead. Only diligent planning of construction work will ensure that urgently required work will minimise operational impact as much as possible.

Currently, chemical shippers and their customers have been severely impacted by both unplanned and planned temporary rail capacity restrictions. This situation has been further compromised by insufficiently coordinated construction works and lack of communication about such capacity restrictions with railway undertakings and shippers.

To ensure success and prevent unnecessary deterioration of the rail freight capacities, Cefic recommends amending the Regulation as follows:

- **Infrastructure managers** shall be accountable to plan and align temporary capacity restrictions to ensure service continuity. Sufficient diversionary route capacities must be made available, and delays must be kept to a minimum.
- Provision of a **consultation process** with railway undertakings in cases where capacity reductions of more than 50% or for more than 48 h have been identified by said infrastructure managers.

The consultation process should clearly communicate the scope of works and result in alternative capacity planning for the duration of the capacity reduction.

- In case of capacity restrictions substantially impacting customers service availability or reliability, Infrastructure managers and railway undertakings shall **include the shippers** in this consultation process.
- **Prioritized scheduling** of works for times of low demand, e.g. during summer/winter holidays.
- **Lower applicability threshold** of the contingency management procedure according to the [Handbook for International Contingency Management](#) : from disruptions exceeding 3 days to disruptions lasting longer than 24 hours to alleviate the impact of unplanned capacity reductions.
- **Increase railway capacity** by establishing a **freight reset procedure** as recommended in a [joint letter](#) of several European associations. This requires additional train paths during weekends to enable operators of regular freight trains to catch-up delays caused during the weekday construction works.

Road Transportation - Infrastructure Requirements

Cefic believes that a sustainable transport system requires optimization of all transport modes. The chemical industry is committed to seize the opportunities of intermodal combined transport solutions, making maximum use of rail, inland waterway, or short sea shipping for the main leg of its transports. However, it will also be vital to improve the road transport efficiency and infrastructure, to increase road sustainability and the safety, comfort and security of drivers, vehicles and cargo. To that effect we recommend:

- Provision of safe and secure parking areas to be available every 50 km, providing sufficient parking space for commercial vehicles and comfort, such as food and sanitary facilities, for truck drivers.
- Member States should rigorously apply best practices to provide new or at least temporary infrastructure for heavy duty vehicles in case of maintenance, replacement, or closing of old infrastructure, e.g. bridges.
- Member States should be obliged to construct roads, enabling higher vehicle and axle weights. Harmonizing the maximum vehicle gross weights is important, as it enables more efficient use of vehicle and driver capacity (less trucks needed, lower emissions). Additionally, in the proximity of combined terminals, industrial clusters or ports, higher weights should be possible to boost the shift to rail and IWW, and the usage of zero emission road vehicles.

Infrastructure for intermodal freight transport

Cefic strongly supports the proposals made to further develop infrastructure enabling the increase of intermodal transport, combining road and rail, specifically:

- The obligatory rail infrastructure parameters for train length (740m), axle load (22,5t), P400 loading gauge,
- electrification and interoperability of signalling systems (ERTMS) along the entire core and comprehensive network
- The creation of adequate railway infrastructure capacity to ensure a definite number of train paths for 740-metre-long trains per hour on every TEN-T line.
- Commitment to a modernisation program of existing intermodal transshipment terminals, the obligation to assess the available capacity of intermodal terminals and the construction of intermodal terminals where capacity is found to be lacking.

Amendments to Regulation (EU) 913/2010 Rail Freight Corridors

Cefic fully agrees with the Commission's intent to strengthen the role of the rail freight corridors. There is an urgent need to improve the effectiveness of monitoring and management of the quality of rail freight services. The revision of Article 19 of Regulation 913/2010 describes that performance monitoring shall be carried out in qualitative and quantitative terms.

However, Cefic requests more detail and proposes to add to the revision proposal text to the following effect:

- Establish an efficient and effective framework and processes for monitoring and management of the performance of freight trains towards the target stipulated in Article 18 of the revision proposal (max. 15 minutes dwell time at borders and at least 90% arrival punctuality). Infrastructure Managers, Railway Undertakings, Rail Freight Corridors, Combined Transport Operators and Terminal Operators, Logistics Service Providers / Freight Forwarders, as well as Shippers shall come together in a European project initiative to define and agree on such framework, agreeing on both processes and supporting KPIs.
- Monitoring performance of combined transport shall be performed at corridor level end-to-end, i.e. from terminal to terminal with loading units "ready for pick up at terminal" by the Logistics Service Providers responsible for the execution of the first- and last-mile transport by road. Also visibility on construction and maintenance works would allow shippers to schedule transport more effectively.
- Cefic calls for the establishment of a supranational performance monitoring body for: (a) definition of measurement criteria (common punctuality KPI), (b) organisation of data flows, (c) publication of punctuality reports, (d) monitoring of the number and duration of disruptions, including cancelled trains.

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About Cefic

Cefic, the European Chemical Industry Council, founded in 1972, is the voice of large, medium and small chemical companies across Europe, which provide 1.2 million jobs and account for 16% of world chemicals production.