The CPMR Baltic Sea Commission (BSC) Transport Working Group considers the revision of the TEN-T regulation to be of the utmost importance to reinforce territorial accessibility and connectivity in the Baltic Sea Region, while promoting a climate neutral transport system to achieve the Green Deal.

This Policy Position includes reactions from the BSC Transport Working Group to the European Commission’s proposal for a TEN-T regulation, published in December 2021.

In line with our previous Policy Position (available here) and proposed amendments to the TEN-T maps (available here), the BSC Transport Working Group would like to underline the importance to develop a TEN-T regulation that is:

- contributing to the decarbonisation of the transport sector, especially through innovation and digitalisation;
- supporting cross-border mobility, both within the European Union and with third countries;
- fostering all transport modes;
- developing a broader definition of urban nodes;
- promoting multi-level cooperation and governance and a strengthened role for the European Coordinators in charge of the European Transport Corridors.

In order to strengthen cohesion between regions, the TEN-T regulation needs a flexible, territorial, and place-based approach when designing criteria for the transport system.

**A TEN-T regulation contributing to the decarbonisation of the transport sector**

The CPMR Baltic Sea Commission Transport Working Group:

- Welcomes the increased focus on climate issues in the new proposal, and the promotion of low-carbon modes of transport, such as rail, including the clear target of a 90% reduction in transport emissions by 2050.

- Supports the emphasis in the proposal on structural infrastructure quality during its whole lifecycle, with particular attention to the future projected climate conditions. Furthermore, the need for infrastructure adaptation measures in light of climate change should be taken into account and proactive action taken to take control of these risks, as specified in the environmental impact assessment for projects of common interests.
- Appreciates that the TEN-T regulation ensures a long-term provision of sustainable alternative fuels through direct references to the proposed alternative fuels infrastructure regulation. Agrees with the European Commission that the rate of developing infrastructure for alternative fuels should increase.

- Welcomes the strengthening of the digitalisation perspective in the regulation, and that digitalisation is considered as a component in achieving the goal of a more innovative, efficient and sustainable TEN-T network.

- Welcomes the new concept of European Transport Corridors (ETC) as a merger of the core network corridors and the Rail Freight Corridors.

- Welcomes the new extended core network and its target year 2040. However, the core network and the new extended core network are to be treated equally in terms of CEF funding, and it is essential that these projects can apply for CEF funding for construction at the same time. Furthermore, is concerned as to whether the evaluation of CEF projects will be neutral when a core network project and an extended core network project compete with each other on the same call for proposals.

A TEN-T regulation supporting cross-border mobility

The CPMR Baltic Sea Commission Transport Working Group:

- Calls for a TEN-T that ensures accessibility for all regions of the EU and therefore that the proposal should be complemented by additional routes and nodes in cross-border areas that are considered to have a strong European added value (see Annex).

- Considers that the cross-border perspective, both within the Union and towards third countries, is one of the strongest added values of European Transport Policy, which unfortunately does not sufficiently permeate the proposed regulation.

- Underlines the importance of harmonisation when building the infrastructure for alternative fuels in cross-border sections. Planning and deployment of new technologies must take place in dialogue between the Member States and regional authorities, so that a reliable, easily accessible and robust system is guaranteed.

A TEN-T regulation fostering all transport modes

The CPMR Baltic Sea Commission Transport Working Group:

- Supports the provisions on better passenger transport by rail by enabling a railway network with a speed standard of at least 160 kph throughout Europe.

- Underlines the importance to coordinate and accelerate the transfer of goods from road to rail and sea by strengthening long-distance multimodal transport chains, including solutions for first / last mile connections, through faster implementation of HCT vehicles, longer freight trains as well as electric and autonomous vehicles.

- Welcomes the increased clarity regarding maritime connections in the TEN-T network with the European Maritime Space and underlines the continued importance of considering waterways as a link in the Scandinavian-Mediterranean corridor to increase functionality and achieve more efficient transport.
- Stresses that the transport connections to/from ports need to be further highlighted in the TEN-T regulation and its annexes, and that these connections between the core network ports and the core network rail and roads should be included in the maps.

**A TEN-T regulation developing a broader definition of urban nodes, leading the way to sustainable mobility in cities**
The CPMR Baltic Sea Commission Transport Working Group:

- Appreciates the broadened definition of urban nodes and the increased clarity regarding their role as connection points for long distance traffic as well as regional and local transport networks. Thanks to the new broadened definition many new cities in the Baltic Sea Region have been included as urban nodes. This will open up new possibilities to develop sustainable transport and smart mobility in urban nodes. However, the BSC underlines the importance as part of the criteria to look at the functionality of urban nodes in order to avoid blind spots in the network in the Northern Sparsely Populated Areas.

- Welcomes the fact that walking, cycling and public transport, such as trains and buses, are a priority in the urban nodes as well as in the comprehensive and core transport network.

**A TEN-T regulation promoting multi-level cooperation and governance and a strengthened role for the European Coordinators in charge of the European Transport Corridors**
The CPMR Baltic Sea Commission Transport Working Group:

- Emphasises the importance of a joint dialogue between regional, national and EU levels in the further planning of the completion of the European transport network.

- Welcomes the fact that the clear focus of the proposal on the transformation of the transport system places more responsibilities and demands on the Member States, as well as the regional and local levels. In order to succeed in achieving the set requirements in time, the CPMR BSC Member Regions demand support and guidance from the national level with regard to, for example, rule interpretation, opportunities to apply for external funding and goal fulfilment. Furthermore, the support should also take into account different regional and local conditions and access to resources.

- Welcomes the strengthening of existing EU instruments (e.g., European Transport Corridors, work plans, implementing decisions of the Commission), as well as of the role of the European Coordinators. Calls for a stronger role for the European Coordinators in the evaluation of CEF applications.

- Is satisfied to see that Annex 3 of the Proposal (*Map Finder Chart for European Transport Corridors*) includes short-sea routes between ports in certain cases as well. Following this welcomed approach, it is, however, necessary to add other relevant short-sea routes (See Annex).
ANNEX

The CPMR Baltic Sea Commission Transport Working Group:

- **Appreciates the proposed extension of the comprehensive road network in Finland** since this takes better into account the needs of freight transport and connects ports to the other parts of the transport system.

- **Appreciates that the addition of the Helsinki-Tallinn fixed link between the two capitals on the TEN-T map is marked as a possible study idea/new construction.** This has been supported by the CPMR Baltic Sea Commission in a letter in 2021 to the European Coordinator of the North Sea-Baltic Corridor of the TEN-T Network.

- **Welcomes the adjustment of the TEN-T maps to include important terminals in Gävle, Sundsvall, Umeå and Luleå, as well as Gävle, Sundsvall, Oulu, Umeå and Örebro as urban nodes.**

The CPMR Baltic Sea Transport Working Group, however,

- **Demands that the connection Oslo-Stockholm is included in the ETC** as this would support the development of the whole region while also providing European added value through cross-border connections. Today, a train journey between the capitals takes more than five hours and therefore the majority of travellers choose to travel by air. With improvements to existing infrastructure as well as construction of two new railway links, it is possible to make a climate-smarter and cheaper journey by train, in the same amount of time as by air. A faster railway connection between Oslo-Stockholm would be a major contribution to the transition to a more sustainable transport system and could potentially move over one million air passengers to the train each year. An improved railway connection would also greatly increase accessibility and commuting opportunities between cities along the route, connecting 3.4 million people in two countries, eight labour market areas and over 50 municipalities including four urban nodes (Oslo-Örebro-Västerås-Stockholm).

- **Demands that the railway connection between Turku and Helsinki in its entirety is kept in the core network.** The target year 2030 for the new shortcut between Salo and Espoo is more suitable since the planning will be completed in 2023 and the construction is planned to be completed at the end of 2031.

- **Demands that the core ports of Turku and Naantali are connected to the core network by train and by road.** The E18 ring-road from the east of Turku to Naantali should belong to the core network, not to the comprehensive network. Currently the TENtec shows this part as being on the comprehensive network.

- **Demands that the ports in or adjacent to the cities of Kalix, Piteå, Skellefteå, Örnsköldsvik and Härnösand are added to the comprehensive network.** The road and rail terminals that need to be included in the same way are Kiruna, Skellefteå, Storuman, Örnsköldsvik, Östersund and Änge as well as Haparanda/Tornio. To achieve the best functionality and green transition, it is advisable to have a terminal and port every 60 to 70 km.
- **Demands that Luleå and Östersund are classified as urban nodes.** These can be regarded as “twin cities” (Luleå/Boden and Östersund/Åre), resulting in populations of more than 100,000 inhabitants. Furthermore, in a vast geography, such as the Northern Sparsely Populated Areas, urban nodes should be considered on a NUTS 3 level rather than NUTS 2 to avoid blind spots in the TEN-T network.

- **Demands that an update of the TEN-T maps is made regarding railway lines in Northern Sweden** that should be incorporated into the comprehensive network in order to ensure green and efficient transportation:
  - Västeraspy-Ångsele (Övre Ådalsbanan), Örnsköldsvik-Mellansel (Mellanselpåret), Bastuträsk-Skelleftehamn (Skelleftebanan) och Piteå-Ålsbyn (Pitebanan);
  - Hällnäs-Storuman;
  - Mora-Gällivare (Inlandsbanan).

- **Demands that the entire functional area is to be considered when granting core network status for port activities**, which would make it possible for ports structured like the Port of Stockholm, which is developed with now four separate geographical areas with the opening of the new container and ro-ro port Stockholm Norvik Port. All four ports interact to ensure efficient transport. Currently, one part of the port has core network status, which prevents developing the TEN-T as each part of the port plays an important role in securing capacity and removing bottlenecks in the corridor.

- **Demands that the road E16 is included in the comprehensive network.** E16 is an important cross-border road in an east-west direction, connecting three major population concentrations in northern Europe: the areas around Bergen, Oslo, and Borlänge-Falun-Gävle. E16 is thus an important link for cross-border transport with efficient interconnection of the Norwegian and Swedish road networks. Standard increases and uniform speed levels strengthen the exchange between the end nodes, the ports of Oslo and Gävle.

- **Demands that Oulu airport and ports are integrated into the core network.** Oulu Airport is the second largest airport in Finland measured by passenger volumes, and Port of Oulu is a key port in Northern Europe’s freight service.

- **Demands that the missing connection between the Helsinki-Vantaa airport and the main rail line is added to the Core Network** (as a high-speed connection). Also, the already shown connection from Helsinki centre to the airport should be marked as Core Network (as a high-speed connection). The connection from the airport to the main rail line is a prerequisite for the realisation of the Eastern line shown in the extended network in the TEN-T proposal.

- **Demands that the Helsinki-Tallin fixed link is marked also between Helsinki centre and Helsinki-Vantaa Airport** as a continuation of the already marked arrow between the two capitals as a possible study idea/new construction and as part of the comprehensive network. As clarification, the high-speed railway line connection between Helsinki centre and Helsinki-Vantaa airport is a different project than the Helsinki-Tallin fixed link extension rail line from Helsinki centre to Helsinki-Vantaa airport.

- **Demands that the relevant short-sea routes are included in the Annex 3 of the Regulation**, such as Rostock (GE) Trelleborg (SE) and Rostock (GE) Gedser (DK), as part of the ETC Scandinavian-Mediterranean corridor.
- Demands that the extension of the railway track Lübeck-Schwerin, including a new connecting link to Schwerin at Bad Kleinen, is included as part of the Scandinavian-Mediterranean corridor.

- Demands that the German Unity Transport Projects 1axis (Hamburg Schwerin Rostock Stralsund) and the extension section of the railway track to Rügen (route Stralsund Sassnitz) are included in the North Sea-Baltic corridor.

- Demands that the extension of the railway track Berlin-Stralsund and the reactivation of the railway line Ducherow Heringsdorf, including the existing branch to Swinoujście are included as part of Baltic Sea-Adriatic Sea corridor.

- Demands that all maritime ports that are currently part of the TEN-T remain in the new version of the Regulation. For instance, the ports of Pietarsaari and Kaskinen in Finland should be reintegrated into the network.

- Demands that the port and the railway of Vaasa become part of the comprehensive network. These new parts of the transport network should be considered as a complementary connection of the North Sea - Baltic and Scandinavian – Mediterranean core corridors. The port and railway of Vaasa fulfil and make the transport network a functional entity which unites different parts of Northern Europe strengthening the energy and battery industry based economic area.

- Demands that in light of the building of the Fehmarn Belt connection, additional connections between Denmark and Sweden are built to secure future capacity needs and create increased resilience in the transport system. It will indeed help streamlining transport flow in Öresund area, with intensive transport interactions due to the strategic cross-border location. Skåne is an important border region for all Nordic countries the transport geographical location is especially important for the whole of Sweden, a third of Sweden's total imports and exports pass through Skåne.

- Demands that the harbours in Arctic, peripheral and sparsely populate areas, with strict icy-winter condition should have exception what concerns 0,1% volume criteria, but also what comes to criteria of passenger traffics. We invite the European Commission to work on a set of alternative criteria to better consider the specific challenges of Baltic Sea ports that suffer extreme winter condition that strongly hamper their activities.

- Demands that the Port of Helsingborg should be included in the core network. Approximately one third of the market value of goods to and from Sweden passes the ports of Skåne, these ports do all have different functions but together they are very important for export and import flows. The port of Helsingborg is Sweden's second largest container port after Gothenburg. The ports' joint contribution which is well functioning should be taken into account when granting the status as a core port and not just criteria for volume.
The Baltic Sea Commission (BSC) is one of the six geographical commission of the Conference of Peripheral Maritime Regions (CPMR). Established in 1996, the BSC serves as a forum for policy-oriented cooperation and lobbying amongst Regional Authorities across the Baltic Sea Region. The BSC Transport Working Group is committed to promote a more functional TEN-T network for strengthening the connectivity and accessibility in the Baltic Sea Region while promoting smart, sustainable and climate neutral transport modes.

Map of Member Regions of the CPMR Baltic Sea Commission