

iMONITRAF! Statement

Revision of the TEN-T Regulation: Requirements to strengthen the modal shift approach in the Alpine Region

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The role of modal shift for a sustainable and future-proof freight transport system in the Alps

Modal shift is THE key rationale for decarbonising and future-proofing freight transport along the Alpine transit corridors. In the Alps and other mountainous regions, the need for action is especially high to accelerate the net-zero transition. Not only are Alpine regions over-proportionally affected by climate change. They are, mainly due to transalpine freight transport, by themselves a large CO₂ emission source. Due to their topographical features, the narrow valleys along the main transalpine transport corridors are also hotspots for exceedances of air quality limits. Moreover, the local population suffer the negative health effects of permanent noise exposure caused by transport.

Key strategies and action plans developed by Alpine institutions and partnerships call for an ambitious modal shift approach, going beyond the current objectives at EU level:

- Alpine Climate Target System and Climate Action Plan¹
- iMONITRAF! Strategy and Policy Pathway²
- AG4 Declaration on Rail and EUSALP Action Plan³
- Transport Protocol of the Alpine Convention⁴
- Action Plan of the Simplon Alliance⁵

People and Economy in the Alpine regions need an ambitious approach on modal shift in the TEN-T Regulation

To limit the negative impacts of transalpine freight transport, Alpine regions and countries have already implemented comprehensive modal shift measures. **A basic requirement for all these measures to become effective, is however the availability of suitable rail infrastructures and services with respect to quality, quantity, reliability and competitive cost structures – not only in our Alpine regions but on the entire length of the TEN-T corridors.**

→ In this respect, we see a high need to reflect this requirement in the TEN-T Regulation and to ensure that the TEN-T supports the creation of a better level-playing-field between road and rail. The Alpine States and the EU have already invested large sums into developing the new railway base tunnels and their access routes. The new TEN-T framework needs to ensure that these investments can realize the envisaged effects for the benefit of all transport users, their governments and economic stakeholders.

¹ <https://alpineclimate2050.org/climateactionplan20/>

² iMONITRAF! Strategy 2012 :

<http://www.imonitraf.org/DesktopModules/ViewDocument.aspx?DocumentID=Uq4SLgeotK4=>

iMONITRAF ! Policy Pathway 2021:

<http://www.imonitraf.org/DesktopModules/ViewDocument.aspx?DocumentID=LpXnowJYhsU=>

³ <https://www.alpine-region.eu/news/15-alpine-regions-call-action-eusalp-declaration-%E2%80%99Crail-transport-alpine-region-%E2%80%93-joining-forces>

⁴ https://www.alpconv.org/fileadmin/user_upload/Convention/EN/Protocol_Transport_EN.pdf

⁵ <https://www.are.admin.ch/are/en/home/international-cooperation/alpine-convention/areas-of-focus/simplon-alliance.html>

Requirement 1: Quality tracks for freight trains (Art. 15 and Art. 16)

The new railway base tunnels in the Alps have the main objective to provide necessary capacities for modal shift of freight transport. Only in combination with their northern and southern access routes can these new infrastructures provide fully effective high-speed and reliable connections to form truly European Transport Corridors through the Alps and beyond. For an efficient transport system as a backbone of a competitive European economy, avoiding CO₂ emissions as well as road congestion and other negative externalities, **the provision of high-quality tracks for freight trains is a prerequisite.**

Therefore the following improvements are needed:

- Provide increased capacities: Reserve - at least! - two slots per hour for freight trains with a length of 740m. These two slots per hour have to be provided throughout the whole day, not focused on the night time only **(Art. 15(2))**.
→ No exemptions and no compromises should be considered as they would lead to undesirable negative effects in combination with the existing instrument mix implemented in the Alpine countries and regions (e.g. the night driving bans and dosing systems in Switzerland and Tyrol).
- Infrastructures that enable efficient long-distance freight transport on rail: A standardised nominal track gauge which can carry cargo trains with a permitted length of 740 metres and a profile complying with the p400 loading gauge **(Art. 16a)**
- Minimum operational line speed: Quality tracks also include a minimum speed for cargo trains or another regulation to closely dovetail cargo trains with the timetable of passenger trains. The aim is to enable an optimised average speed adapted to the respective conditions in order to increase the efficiency in the use of the track. Defining a strict minimum speed of 100 km/h for freight is too rigid **(Art. 16(2))**.

Requirement 2: Provisions for simple and fast border crossings (Art. 17 and Art. 18)

Shifting long-distance freight transport across the Alps to rail also depends on simpler and faster provisions for border-crossings to reduce travel time of trains and thus increase their competitiveness. Today, freight trains lose up to one hour with border administrations, leading to additional costs and unnecessary delays.

To enable faster border crossings, we support the requirements as proposed in the opinion of the Parliament:

- Boost the deployment of ERTMS **(Art. 17(1) and (5))**: An improved border-crossing depends on an ambitious regulation to finalize the deployment of ERTMS on the TEN-T network as this has a large potential to optimize rail services. In particular, stronger synergies between infrastructure planning and the operation of transport services might be achieved. A fully operable ERTMS will improve capacity of rail transport by up to 40%.
- Accelerate border-crossing procedures, especially to set a maximum dwelling time of 15 minutes at national borders, supported by simpler administrative procedures based on e-papers and train-related electronic data exchange. **(Art. 18)**

Requirement 3: Improve terminal infrastructures to enable longer rail legs in intermodal transport (Art. 35 and Art. 41)

Efficiency gains for transport companies as well as CO₂ reduction and better air quality is in everyone's interest and will be the result of exploiting the longest possible rail legs in intermodal transport.

- We thus support the proposal of the European Commission and the European Parliament to **include provisions for a mandatory modernisation of existing intermodal transshipment terminals, the obligation to prove and improve the available capacity of intermodal terminals and the construction of intermodal terminals where capacity is found to be lacking (Art. 35)**.
- To improve last-mile-solutions and to ensure that urban areas are well interconnected to the

TEN-T, we also support the proposal to improve the network of intermodal transshipment terminals in urban nodes, interconnected with local and regional infrastructure (**Art. 41**).

Alpine regions have identified initial needs to develop the terminal infrastructure in the list of labelled projects by EUSALP Action Group 4 Mobility.⁶

Requirement 4: Strengthen the commitment to finalize the TEN-T corridors – infringement options (Art. 54 and Art. 62)

We as Alpine regions have put considerable efforts into strengthening modal shift over the last years – through an ambitious and co-ordinated modal shift policy but also through substantial investments in large-scale rail infrastructures. The Brenner Base Tunnel and its access routes alone require a financial volume of 9.3 bn. Euros with the objective to make rail transport on the Scan-Med corridor more attractive. Similarly, investments on the Rhine – Alpine corridor were substantial. Investments in Switzerland on developing the “New Railway Link through the Alps” sum up to 22.6 bn. Swiss Francs. These investments can only pay off if our neighbouring regions and countries take the same ambition in further developing the European rail infrastructure network. Shifting long-distance transport to rail requires an overarching corridor-approach and not a regional one.

To avoid that large sums of our regional investments and thus our tax payer’s money turn into unprofitable infrastructure projects and thus “stranded assets”, we see the strong need to strengthen the commitment for the timely finalisation of the TEN-T core network.

- We thus welcome the proposal of the European Commission to turn the working plans of the TEN-T coordinators into implementing acts with yearly reporting – these are necessary to quickly kick-off infringement procedures if works on the TEN-T infrastructures are delayed (**Art. 54**).

In this line, we strongly support the ambition of the TRAN Committee to set a clearer framework for launching infringement procedures if infrastructure development is lacking behind (**Art. 62**). Especially, we welcome the new proposal of the TRAN Committee to immediately launch infringement procedures when it comes to delays on works related to the core network (**Art. 62(3 a)**).

Our position builds on the large knowledge pool of the Alpine transport networks and a broad political support:

Facts & Figures that support our position:

- Experiences from Switzerland (see for example summaries in [iMONITRAF! Annual Reports](#))
- Recommendations from [AlpInnoCT](#) including a toolbox for political measures
- AG4 activities: [labelled projects](#) that support the efficient use of TEN-T
- 40% capacity increase through ERTMS (<https://www.ertms.net/wp-content/uploads/2021/06/10.-Increasing-infrastructure-capacity.pdf>)

Political support for our position:

- [AG4 Declaration](#) to boost Rail transport
- Action Plan [Simplon Alliance to make all Alpine transport CO2-neutral by 2050 at the latest](#)
- iMONITRAF! [Strategy](#) (2012) and [political resolution](#) (2020) that re-confirms modal shift as major rationale to future-proof the transport system in the Alps
- [Alpine Climate Target System](#) and [Alpine Climate Action Plan 2.0 in which the Pathway no. 1/Transport focuses on ‘Strategies for decarbonisation of Alpine freight transport’](#).

⁶ <http://alpine-region.eu/news/labelling-14-projects-macroregional-added-value-fostering-sustainable-mobility-solutions>