



**5. May 2021**

### **Norwegian position paper - Open consultation on revision of TEN-T guidelines**

TEN-T contributes to efficient flow of goods and services in the internal market and ensure European business competitiveness. The European Green Deal and new Mobility Strategy set ambitious targets for reducing CO2 emissions from the transport sector. The revision of the guidelines and development of TEN-T are important factors in achieving the targets.

Main messages:

- Norway supports the revision of the TEN-T guidelines.
- The measures should support a more sustainable, digital, and robust transport.
- The measures should be socio-economic profitable.
- The measures should be technology neutral and a modal shift should not be an objective in itself.
- Norway proposes to include Stockholm-Oslo in the ScanMed corridor.

Norway recognises the findings in the evaluation of the current guidelines, and the global fact, that we have not done enough in achieving sustainability goals for the transport sector. To succeed in the major transition from fossil fuels to low and zero-emission solutions we must improve our efforts within all transport modes. One crucial issue is to increase facilitation for charging and alternative fuels infrastructure so that users can adopt new technological solutions. We believe it is important to develop common standards and requirements for charging and fuel infrastructure for zero- and low-emission vehicles to achieve the objectives related to climate and the environment. This is important also in the ongoing revision of the Alternative Fuels Infrastructure Directive (2014/94). Standardised and user friendly ITS solutions can help provide good user experiences related to charging and fuel infrastructure. Information about charging points, technical standards for charging solutions and payment solutions are examples of areas where improvement is needed.

We share the considerations regarding safety and the challenges related to increased risks caused by natural and human made disasters. We recommend that a minimum level of requirements for risk and vulnerability analyses be assessed incorporated into the guidelines.

In general, we consider the level of detailing in the current guidelines to be appropriate. This reflects the need to find and adapt the best ways to achieve the objectives in the different European countries. The flexibility in the current guidelines should be continued.

In particular, we point out that there is access to the use of conventional strategic roads where the traffic volume allows this. This is very important for parts of the Norwegian TEN-T road network.

Norway assesses the socio-economic benefits of projects, and this will continue to be a key criterion for prioritising measures. Some of the requirements in the TEN-T regulations will entail very costly measures, which must be assessed against the benefits of the measure. It is important that the revised guidelines and requirements for measures have this as a clear premise.

In line with this, we would like to point out that the main objectives, like decarbonising, should conduct the choice of policy instruments. This approach leads to technology neutral measures and more cost-effective ways of achieving the objectives.

## **ITS**

Digitalisation is one of the key enablers to achieve the ambition of a smart and sustainable transport system. The ITS directive with its delegated acts refers to the TEN-T network as the scope of application. The TEN-T network thus plays an important role in ensuring uniform requirements and standards for physical and digital ITS infrastructure to be deployed in the network. This shows that TEN-T can be a driving force for standardized and coherent deployment of ITS across the most important transport networks in Europe.

## **Extension of the ScanMed corridor**

The ScanMed corridor is the most important land-based connection to and from Norway. In this context, we welcome the extension of the Scan-Med corridor in Denmark with the "Jutland-route" and along the Gulf of Bothnia with an arm to Narvik. This extension will be of significance for the involved regions. We would like to propose inclusion of the link between Oslo and Ørebro/Hallsberg on the route between Oslo and Stockholm to the ScanMed corridor. This link used to be a part of the Nordic Triangle connecting the capitals of Denmark, Sweden and Norway. The inclusion of the link in the ScanMed Corridor will contribute to faster implementation and improved transport services for freight and passengers. There is ongoing political dialogue between Sweden and Norway regarding this connection.

## **Railroad**

The Norwegian core network is already fully electrified. For the comprehensive railroad network there are lines that are non-electrified. We consider electrification of the entire comprehensive network to be costly and proposes to consider requirements that focus on emission cuts rather than commit to one technological solution. The first hybrid train sets are already under commissioning in Norway, and one can imagine that such bimodal train sets can have both electric propulsion and other emission-free propulsion – be it hydrogen, battery solutions or the like. Similarly, one should refrain from requiring electrification of all sidings – many locomotives are now starting to come on the market with "last mile" technology, reducing the need for absolute requirements.

No line in the Norwegian core network has a line speed of more than 100 km/h on all parts of the line. The parts with a lower speed are particularly related to stations and geographical challenging conditions. It is our experience that the same applies to conventional railway lines in cities and towns in EU at large. We are aware that the Commission is considering introducing a target for transit times in the core network – i.e. a measure that addresses the commercial speed of trains over a longer distance instead of a requirement for each line section. We consider this to be a better way to measure the real performance of the railway infrastructure. Improving the infrastructure for higher speeds – especially in urban areas – can be very costly and time-consuming. The guidelines state that exceptions may be granted in "duly justified cases", but we recommend the Commission to consider providing examples of exceptions that can be accepted.

### **Maritime transport**

Shipping is a global industry. The terminology in the EU is largely rooted in the EU initiative e-Maritime. Here, terms used are not always "recognized" in IMO's e-navigation. For us to achieve optimized systems and succeed with digitalisation, the TEN-T guidelines should strengthen the relationship to IMO's e-navigation and work with maritime intelligent transport systems (maritime ITS). In addition, we would like to emphasise in general that user involvement and evaluation along the way is a prerequisite for developing user-friendly systems.

The term "seaport" is not included among the terms defined in Article 3 of the TEN-T Guidelines. The term "seaport" is used in Article 20, that regulates which seaports will be part of TEN-T. In the TEN-T Guidelines maps and lists, the TEN-T infrastructure is identified as the name of the municipalities/cities (hubs), such as "Copenhagen". In the case of Norway, municipality names are also used, and in one case name of area (Grenland), to identify the TEN-T-port.

The above may lead to insecurity and different practices with regard to which specific areas and infrastructure are deemed to be part of the individual TEN-T port. In general, we find the current level of precision sufficient regarding which port is to be included in TEN-T. However, the need to be precise may arise when other directives use TEN-T as the scope of application.

This is the case for the Port Regulation ((EU) 2017/352), which applies to the TEN-T ports. The Port Regulation provides rights and obligations for users and private actors such as owners of port infrastructure and areas and suppliers of port services. In the Port Regulation, the term "seaport" is defined, but the wording of the Regulation does not solve the issue of whether the Regulation shall apply to all seaports in the municipality.

We recommend the European Commission to consider if TEN-T ports should be defined more precisely in the TEN-T Guidelines than today, mainly with municipality name.