



Minister Martin Kupka
Ministry of Transport
nábřeží Ludvíka Svobody 1222/12
110 15 Prague 1
CZECH REPUBLIC

Brussels, 10 November 2022

Subject: Setting the right policy framework for road transport in the TEN-T Network Regulation

Dear Minister Kupka,

The ongoing revision of the European Union (EU) Regulation on the development of the Trans-European Transport Network (TEN-T) is vital to the EU's commercial road transport sector.

As EU road transport social partners, the International Road Transport Union (IRU) and the European Transport Workers' Federation (ETF) appreciate the efforts of the Czech Presidency of the EU Council to reach a common position before the end of the year. However, we are deeply concerned about the potential lack of Member States' commitment with regards to key objectives of the Regulation, such as ensuring safe and secure truck parking areas (SSTPAs) along the entire TEN-T Network.

We call on your support to make the TEN-T Regulation more ambitious, which would allow it to:

- Concretely encourage the establishment of more SSTPAs on the entire TEN-T Network;
- Promote tangible complementarity and cooperation between different transport modes; and
- Actively support the shift to decarbonisation, as outlined in the European Green Deal.

In detail, the EU road transport social partners call for ambitious and pragmatic solutions:

1. *A full network of safe and secure truck parking areas (SSTPAs) should be built on the core and extended core network by 2035 and on the comprehensive network of the TEN-T by 2040. Intermediate deadlines should be set for as early as 2027.* There are about 100,000 missing parking spots in the EU and very few parkings are safe and secure and have sufficient facilities for truck drivers. This negatively affects drivers' rest time and even their wellbeing and, by extension, driver safety and the attractiveness of the profession. Our sector currently lacks 420,000 drivers, while 1 million unfilled driver jobs are expected by 2026. The EU cannot afford to wait until 2050, or even 2040, as proposed by the European Commission, without making any efforts to ensure that a proper network of parking areas is systematically extended throughout the EU.

In addition, to make a more efficient use of the Connecting Europe Facility (CEF) funding, *the EU should consider broadening the scope of eligible projects, such as extending the funding to cover SSTPAs located on the comprehensive network of the TEN-T in future calls for proposals.* Currently, numerous potential projects located on the comprehensive network are left outside the scope. More efforts should be made to create, well in advance, awareness about available funding opportunities to improve the quality of applications and allow the creation of partnerships

2. *Accessibility to existing multimodal freight terminals and passenger hubs for road transport operators should also be improved to enhance modal complementarity and horizontal cooperation.* Focusing on improving the existing network of terminals and hubs on the TEN-T should encourage multimodal transport in the short term. In the medium and long term, the revision of the TEN-T Regulation can incentivise the construction of new terminals and hubs. However, more ambitious deadlines than the ones proposed by the European Commission are required.
3. *Deadlines for building the infrastructure needed to charge electric vehicles in terminals and hubs around urban nodes should be fully synchronised with the Alternative Fuels Infrastructure Regulation (AFIR).* Furthermore, refuelling infrastructure for hydrogen should be included in terminals and hubs.

Facts and figures

According to Eurostat's latest figures, more than three quarters (77.4%) of total inland freight transport in the EU are carried by road. This figure has increased over the last decades. Furthermore, according to the European Commission, despite an initial decrease in freight transport demand due to the COVID-19 pandemic, demand for freight transport in the EU is expected to grow by more than 100% until 2050. Even if we assume that a substantial share of freight is taken up by other modes of transport, which is necessary to cope with the predicted increase, the share and number of vehicles on the road will remain significant.

Similarly, the latest figures recorded by Eurostat show that collective passenger transport by road (i.e., buses and long-distance coaches) is the second most used form of transport within the EU after private passenger cars. The European Commission estimates that commercial passenger transport will increase by 42% by 2050.

Given the role of road transport in the mobility of goods and people in the EU and the forecasted increase in demand, the EU's environmental and road safety policy objectives cannot be achieved without investment in all modes of transport, including the road transport sector.

We count on your support for a safe, reliable, and robust road infrastructure network to facilitate the daily mobility of people and goods and to improve the complementarity of commercial road transport with other modes of transport, in the interest of the EU's economy and citizens.

Yours sincerely,



Raluca Marian, Director EU Advocacy and General Delegate, IRU Permanent Delegation to the EU



Roberto Parrillo, Chair of Road Section, European Transport Workers' Federation