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The European Commission proposal to revise Union guidelines for the development of the Trans-European Transport Network

IRU Position on the development of the Trans-European Transport Network

I. IRU POSITION

The revision of the European Union (EU) guidelines for the development of the Trans-European Transport Network (TEN-T proposal) is significantly important for the road transport industry. Commercial goods and passenger transport need a robust and reliable road infrastructure network to efficiently carry out daily business operations and to link up with other transport modes. The TEN-T guidelines should acknowledge the fundamental role that road transport plays in driving economic prosperity. IRU specifically calls for the following:

Road transport infrastructure

- Respect the deadline for the completion of the core network without delay and complete the extended core and comprehensive networks by 31 December 2035.
- Plan and build new road links on the TEN-T Network that includes connections to multimodal transport hubs.
- Establish a European road transport mobility space as foreseen for other transport modes.

Alternative fuels infrastructure targets

- Ensure full compatibility between the TEN-T guidelines and the alternative fuels infrastructure rules (AFIR). The ambition for more electric recharging stations and hydrogen refuelling stations along the TEN-T corridors and in urban nodes should be consistent.
- Ensure the presence of electric recharging stations in multimodal goods and passenger terminals and hubs dedicated to heavy-duty vehicles (HDVs) by 31 December 2025.

Safe and secure parking areas

- Establish a dedicated target of doubling the number of safe and secure parking places by 31 December 2025.

Allow vehicles transporting abnormal loads and high-capacity vehicles on the TEN-T network

- Allow vehicles transporting abnormal loads to make use of the road infrastructure network dedicated to dual civil-military use. A mapping exercise should be carried out to identify the most suitable locations and corridors for such vehicles.
- Allow high-capacity vehicles, including Eco-trucks, to operate on the core, extended core and comprehensive networks.

Urban nodes

- Ensure the presence of goods terminals and multimodal passenger hubs in urban nodes by 31 December 2025.
- Sharing business-generated data through multimodal digital mobility services should always be voluntary and the data collected used for a specific purpose only.

II. ANALYSIS

1. Road transport infrastructure

A competitive commercial road transport sector requires a robust and reliable infrastructure network across the EU. According to Eurostat, road goods transport accounted for 76.3 % of the total inland goods transport in 2019, followed by rail and inland waterways transport (17.6 % and 6.1 %, respectively).¹ Similarly, figures recorded by Eurostat in 2019 show that collective passenger transport by road is the second most used form of transport in the EU after private passenger cars.² The new TEN-T proposal should have stimulated better alignment, coordination and compatibility between actions undertaken by individual Member States to link and enhance multimodal transport hubs and terminals across modes, without discriminating against specific ones. In addition, the proposal should have aligned the requirements contained in the European Commission's (EC) AFIR proposal to ensure a harmonised availability of alternative fuels infrastructure across the TEN-T Network for both goods and passenger transport. The TEN-T guidelines interlink very closely with the AFIR proposal and maintaining compatibility is essential for the implementation of the European Green Deal.

The TEN-T proposal should not overlook EU initiatives on data governance and efforts should be made to align them. At the same time, it is necessary to stimulate and encourage digitalisation of transport operations as digital freight transport documents (under Regulation (EU) 2020/1056 on electronic freight transport information) should be accepted across the EU; and digital mobility services should be harmonised and interoperable. This is especially important for the commercial road transport sector, which relies on smooth border crossings and the proper functioning of the single market.

The TEN-T proposal also falls short in detailing the level of ambition regarding the completion of the core, extended core and comprehensive networks. The targets for completing the core network by 31 December 2030, an extended core network by 31 December 2040 and the comprehensive network by 31 December 2050, will hamper the competitiveness of road transport, as well as of other transport modes. It should be noted that the vast majority of multimodal transport operations contains a road component. Road connectivity should be improved by completing the core, extended core and comprehensive road networks as rapidly as possible since it will contribute to decarbonisation, improve efficiency and reduce the use of private passenger cars.

Moreover, the TEN-T proposal does not acknowledge the importance of commercial road transport to European citizens and the economy since it focuses on forcing a modal shift away from road. The proposal should look at improving the efficiency, innovation and sustainability of individual transport modes and their complementarity. Member States should be encouraged to engage more in cross-border projects, with a focus on providing seamless movement of goods and people by road.

IRU Calls:

- Respect the deadline for the completion of the core network without delay and complete the extended core and comprehensive networks by 31 December 2035.

¹ Eurostat, 2021. See: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Freight_transport_statistics_-_modal_split#Modal_split_in_the_EU

² Eurostat, 2020.

- Plan and build new road links on the TEN-T network that includes connections to multimodal transport hubs.
- Establish a European road transport mobility space as foreseen for other transport modes.

2. Alternative fuels infrastructure

A wide range of different alternative fuels infrastructure has to be made available on the core, extended core and comprehensive networks for different types of commercial road transport operations, even during the transition period. The TEN-T and AFIR proposals should keep in mind the reality of the market, i.e. the lack of alternative fuels infrastructure will add to the challenges faced by the commercial road transport sector to switch to the use of alternatively fuelled vehicles. For instance, this could give rise to schemes where a limited number of transport operators provide services in urban areas. As a consequence, this will discourage investments in the further uptake of alternatively fuelled vehicles. Therefore, there is a real need for sufficient alternative fuels infrastructure and a level-playing field in the market.

IRU also specifically points that the alternative fuels infrastructure targets concerning light-duty vehicles (LDVs) on urban nodes need to be included in the AFIR rules. LDVs are used extensively for both goods and passenger transport, including taxi services and hire cars with drivers. Their role in regional and local transport is fundamental. Since both proposals consider alternative fuels infrastructure targets for HDVs on urban nodes, it is necessary to coherently extend this requirement to LDVs to ensure compatibility between the TEN-T guidelines and the AFIR rules.

The TEN-T proposal goes into detail in providing the specific location of where the alternative fuels infrastructure, in this case electric recharging stations, should be installed. Multimodal freight terminals, as well as, multimodal passenger hubs dedicated to HDVs are required to have one electric recharging station by the end of 2030. IRU welcomes this, however, the ambition needs to be increased further to meet the objectives of the European Green Deal. Moreover, targets for hydrogen and other alternative fuels refuelling stations should also be included in the TEN-T guidelines in order to make them fully compatible with the use of alternative fuel infrastructure. Aligning the TEN-T proposal with the provisions of the AFIR proposal will further stimulate the uptake of alternative fuels in commercial road transport.

IRU Calls:

- Ensure full compatibility between the TEN-T guidelines and the AFIR rules. The ambition on electric recharging stations and hydrogen refuelling stations along the TEN-T corridors and in urban nodes should be consistent.
- Ensure the presence of electric recharging stations in multimodal goods and passenger terminals and hubs dedicated to HDVs by 31 December 2025.

3. Safe and secure parking areas

A significant lack of safe and secure parking areas for trucks and commercial vehicles continues to pose a major challenge to the commercial road transport sector (there are only 7,000 safe and secure parking places out of 300,000 in the EU). Ensuring the availability of safe and secure parking areas on the core and extended core network by 31 December 2040 and on the comprehensive network by 31 December 2050, completely lacks the ambition to guarantee professional drivers access to adequate resting facilities. The absence of binding numerical targets for safe and secure parking areas is a significant shortfall. The requirement for Member States to meet the criteria outlined in the EC Delegated Regulation supplementing Regulation (EC) No 561/2006 regarding the establishment of standards detailing the level of service and security of safe and secure parking areas and to the procedures for their certification is, however, a step in the right direction.

In addition, the maximum distance requirement to have safe and secure parking areas every 100 km might not be suitable for those Member States and regions which

experience less traffic density than others. This is equally relevant for the requirement to establish alternative fuels infrastructure on motorways, where the AFIR proposal sets the target to have at least one electric recharging station in each safe and secure parking area by 31 December 2030 on the comprehensive network.

IRU Call:

- Establish a dedicated target to double the number of safe and secure parking places by 31 December 2025.

4. Allow vehicles transporting abnormal loads and high-capacity vehicles on the TEN-T network

The TEN-T proposal mentions the possibility of including additional roads on the TEN-T Network to enhance synergies between civilian and military transport use. This could be an opportunity for the EU to introduce a cross-border road network which can be used by Eco-trucks or high-capacity vehicles, including vehicle combinations³ used for the carriage of abnormal loads. A recent joint report by the European Parliament (EP) and the Council on the implementation of the Action Plan on Military Mobility⁴, mentions that increasing synergies between existing Union policies, notably the TEN-T Network and military needs, remains an essential pillar of the Action Plan. Despite this, the TEN-T proposal does not specify how it plans to include additional roads to enhance synergies between civilian and military transport networks. There is also no mention of the geographical location of the additional roads.

Whilst high-capacity vehicles or Eco-trucks are not considered in the TEN-T proposal, it is timely to reflect and open up the core, extended core and comprehensive networks for the free circulation of Eco-trucks. The use of high-capacity vehicles is the fastest, simplest and most cost effective way to reduce CO₂ emissions in goods transport by road and contributes to the wider objectives of the European Green Deal and of the EC's Fit for 55 Package. Depending on the vehicle combination, Eco-trucks or European Modular System (EMS) can reduce overall fuel consumption and, thereby, reduce CO₂ emissions by up to 35%. EU-wide rules complementing national rules for cross-border use are necessary for high-capacity vehicles to operate internationally.

IRU Calls:

- Allow vehicles transporting abnormal loads to make use of road infrastructure network dedicated to dual civil-military use. A mapping exercise should be carried out to identify the corridors for use of such vehicles.
- Allow high-capacity vehicles, including Eco-trucks, to operate on the core, extended core and comprehensive networks.

5. Urban nodes

The adoption of sustainable urban mobility plans (SUMP) should contemplate measures such as the wider deployment of information and communications technology (ICT) tools and intelligent transport systems (ITS) to allow optimised itineraries for commercial vehicles, priority at traffic lights and real-time information on alternative fuels infrastructure availability. Risks continue to exist related to a fragmented implementation of SUMP, as urban nodes will have their own plan. Urban nodes should ensure a sustainable, seamless and safe interconnection between road, rail and air transport to facilitate multimodality without penalising one transport mode

³ High capacity vehicle combinations are vehicles that are either longer than standard combinations, or, longer and heavier. These vehicle combinations improve transport productivity and consume less fuel, thus, produce less CO₂ emissions as they consolidate freight from smaller commercial vehicles. Given these economic and ecological advantages, they are, by definition, Eco-Trucks.

⁴ Joint report to the European Parliament and the Council on the implementation of the Action Plan on Military Mobility from October 2020 to September 2021. See: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=JOIN%3A2021%3A26%3AFIN&qid=1632680633547>

over the other. The role of road transport should be reinforced as it usually serves as the first and last mile of a goods' and passenger's journey.

Urban nodes will need to closely look at how to harmonise multimodal mobility services as different transport modes still operate in silos. Lack of transparency, combined with the absence of a binding legal framework recognising the rights of business data generators, make transport operators hesitant to share the data they generate. In addition, the obligations and liability of parties (transport operators, intermediaries and public bodies, for example) involved in the exchange of business data should be clearly defined and the rights of the data generators should be explicitly recognised. Transport operators should share data only on a voluntary basis and the data collected by public bodies or any third party should be for a specific purpose only.

A dense network of alternative fuels infrastructure serving both LDVs and HDVs on urban nodes will be needed to facilitate the uptake of low and zero-emission vehicles; and priority access for commercial vehicles to the alternative fuels infrastructure will ensure business operations are run efficiently in urban areas. Although IRU welcomes that the TEN-T proposal increases the number of urban nodes from 88 to 424, it is far from sufficient in making a significant impact regarding the alternative fuels infrastructure needed by vehicles that enter or transit through urban areas or cities. The likely introduction of UVARs in urban nodes will create barriers to cross-border and domestic transport services by only incentivising low and zero-emission vehicles. It is key to establish a legally binding EU framework where restrictions to commercial traffic will not be imposed without providing solutions and alternatives.

IRU Calls:

- Ensure the presence of goods terminals and multimodal passenger hubs in urban nodes by 31 December 2025.
- Sharing business-generated data through multimodal digital mobility services should always be voluntary and the data collected used for a specific purpose only.

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