

Brussels, April 2009



**Trans-European Transport Network (TEN-T) Policy Review  
COM(2009) 44**

- SNCF contribution to the public consultation -

---

**The SNCF considers the TEN-T policy review as a positive contribution to the setting-up of transport infrastructure matching the ambition and the dimension of the EU transport policy.**

Although measures aiming at optimising existing transport infrastructures are necessary (cf. Proposal for a regulation COM(2008) 852 concerning a European rail network for competitive freight), they should not be limited to freight and will not be sufficient, taking in consideration the expected transport growth<sup>1</sup>.

This TEN-T policy review should also contribute positively to the EU environmental policy. As the transport sector is responsible for 27% of CO2 emissions<sup>2</sup>, it is high time to shift the growth of transport demand toward transport modes that are more environmentally friendly and in particular to rail<sup>3</sup>. This strategically shift would enable the rail sector to develop a competitive alternative, matching the expectations of loaders and passengers in terms of performance.

The Green Paper adopted by the European Commission on February 4th, 2009 (COM 2009/44) suggests that fundamental principles are taken into consideration in the future TEN-T policy:

- the concentration of Community funding on a reduced number of « high European added-value » projects. In the framework of the TEN-T policy review, this principle could allow to increase the co-financing rates to induce a real acceleration and a catalytic effect to the realisation of the infrastructure;
- the business orientation of the central network (as it is developed in the third scenario of the Green Paper, through the 'conceptual pillar');
- the contribution to the environment objectives and the fight against climate change as well as the integration of the carbon offset in the criterion of selection of TEN-T projects. The SNCF underlines the importance to integrate as objective to the future TEN-T policy to allow modal shift from road to rail;
- the development of wider co-modality, in particular through the development of intermodal nodes ;
- the suppression of bottlenecks ;
- the integration of long distance traffic as well as regional and urban traffic, while keeping into consideration the specificities of regional markets;
- the consideration of the different needs of passenger and freight transport. The SNCF raises the attention of the European Commission on the specific difficulties caused by the cohabitation of these two types of traffic (on mixed lines and in the bottlenecks) and the need to adopt a global approach and not a sequential one. The SNCF reminds its strong wish for the implementation, on a European level, of conditions allowing the competitiveness (and accordingly the development) of rail freight as well as the setting-up of a European high-speed network, which is the condition of a modal shift from road to rail for goods and passengers.

---

<sup>1</sup> The volume of transported goods in Europe (in tons/kilometres) should grow by 50% between 2000 and 2020 and the passenger transport should rise by 35% over this period (European Commission, 2006).

<sup>2</sup> (European Commission, 2007).

<sup>3</sup> The railway sector produces about eight times less CO2 (by ton transported) than trucks and four times less than inland waterways (EcoTransIT Study, 2008).

- the concept of “axis performance” allowing to align the characteristics of the infrastructure from start till end of the line. The SNCF considers that this global vision, suggested by the European Commission, should also be applied to socio-economic studies of infrastructure projects, based on long distance traffic flows;
- the concept of “corridor coordination approach”, associating of the relevant stakeholders (infrastructure managers, railway undertakings, customers, local and regional authorities) in the development of acceptable solutions that are technically, economically and financially feasible;
- the evolution toward an harmonisation of the track access charge systems is highly recommended. The structuring and the multiannual contracting of the track access charges are indeed a condition sine qua non to mobilise private funds. In addition, this multiannual visibility (on the level of track access charge and on the quality of the infrastructure) and its coherence with the initial track access charge hypothesis are necessary for the railway undertakings to acquire the adapted rolling stock;
- the application of Intelligent Transport Systems to all transport modes;
- the taking into consideration of several Community financial perspectives for long projects.

The SNCF welcomes the above-mentioned points, in order to achieve the expected goals indicated in the Green Paper. The SNCF contributed to the public consultation launched by the European Commission. Please find the answers to the questionnaire below.

### **- Answers to the Questionnaire -**

**Q01. -Should the Commission's assessment of TEN-T development to date cover any other factors? (optional)**

Globally the SNCF shares the Commission's assessment (too broad dispersal of Community funding, lack of environmental criteria, etc.) but regrets the lack of “business orientation” in the identification of priority projects.

**Q02. -Should the comprehensive network be maintained or abandoned, and what advantages and disadvantages would either approach involve? Could the respective disadvantages be overcome, and if so by what means? (optional)**

■ **YES - the comprehensive network should be maintained**

- Please justify your answer (compulsory):

The comprehensive network gives a wider approach of the European projects and preserves the benefits of the current TEN-T policy.

- Please allocate the advantages as described above to the following categories: (optional)

- Important for access function and territorial cohesion;
- Reference basis for structural policy objectives;
- Basis for a broad range of transport policy objectives (Help: rail interoperability, road safety etc.);
- Large scope for identification of projects of common interest;
- Broad reflection of national infrastructure planning;
- Others (please specify above);

- Please allocate the disadvantages, as described above, to the following categories: (optional)

- Truly European planning is hardly possible;
- Community instruments are insufficient to allow full network implementation;
- Community added value of many projects of common interest is questionable;
- Community action lacks visibility;
- Others (please specify above);

**Q03. -Would a priority network approach be better than the current priority projects' approach? What would be the advantages and disadvantages of either approach, and how should it be developed? (optional)**

■ YES - The priority network approach would be better than a priority projects approach

- Please justify your choice:

The priority network allows the concentration of Community funding on a reduced number of projects (this principle could allow to increase the co-financing rates to induce a real acceleration and a catalytic effect) and a better "business orientation". Moreover a clarification of the criterion and assessment methods, which takes into account essential additional criterion (environment, commodity, modal shift, etc.) will offer a better visibility for the TEN-T policy.

- Please allocate the arguments described above to the following categories:

- Advantages of priority network approach (compared to priority projects approach) (optional)

- More rational planning approach at European level, including the possibility for coverage of network benefits;
- Possibility for coverage of all modes;
- Possibility for coverage of nodes and inter-modal connections;
- Possibility of better reflection of major European traffic flows and Cohesion objectives;
- Better focussed projects of common interest;
- Coherence between instruments (financial and other) necessary for full network implementation and planning objectives as challenge for future TEN-T policy;
- Enhanced possibilities for "environmental optimisation";
- Others (please specify above);

- Disadvantages of priority network approach (compared to priority projects approach) (optional)

- Difficult to plan such a network for reasons of planning methodology;
- Difficult to combine with sovereign national responsibility for infrastructure development;
- May become too large in scope to ensure sufficient Community funding; thus not much change compared to comprehensive network approach;
- Others (please specify above) ;

- Elements that should be taken into account in the development of a priority network approach (planning method) (optional)

- Traffic flows;
- Social, economic and geographical cohesion;
- Environmental protection / climate change;
- Due coverage of all transport modes;
- Inter-modal connections;
- Connections between long distance transport and local transport / urban nodes;
- Links to third countries;
- Interoperability and infrastructure standards;
- Minimum capacity requirements;
- Intelligent transport systems and new technologies (infrastructure and vehicles);
- Implementation capacities;
- Harmonized cost-benefit analysis;
- Others (please specify above);

Comments:

- The suppression of bottlenecks is a condition sine qua non to the development of efficient transport infrastructures in Europe. Every bottleneck (even not situated on the priority network) will affect the fluidity of the traffics on these axes.

- The integration of long distance traffic as well as urban traffic is important to ensure the efficiency of the transport from start to end of the line, while keeping into consideration the specificities of regional markets.

- The harmonized costs-benefits analysis should not be limited to economics facts, but should also take into consideration the environmental impacts (integration of external costs, etc.).

- The consideration of the different needs of passenger and freight transport. The SNCF raises the attention of the European Commission on the specific difficulties caused by the cohabitation of these two types of traffic (on mixed lines and in the bottlenecks) and the need to adopt a global approach and not a sequential one. The SNCF reminds its strong wish for the implementation, on a European level, of conditions allowing the competitiveness (and accordingly the development) of rail freight as well as the setting-up of a European high-speed network, which is the condition of a modal shift from road to rail for goods and passengers.

- The TEN-T network should be truly interoperable. In order to speed-up the realisation of such an interoperable network, the cost-benefit analysis of realised interoperability investments should be positive for infrastructure managers and for railway undertakings.

Nevertheless it is clear that, regarding ERTMS, less than three years before the planned deadlines and taking into account the past experience, the availability of 3.0.0 ERTMS version, which should ensure an ascendant compatibility with the 2.3.0 version and be available in 2012, is far from being ensured.

In this regard, even if the 2.3.0 version has needed three years of development and has been approved on April 23<sup>rd</sup>, 2008, it has not been yet brought to the market, and no ERTMS system is currently operating in international service. In addition, structural questions, such as braking curves, GSM-R capacity in important nodes or security modalities, remain unanswered.

ERTMS equipment implies important investments on the infrastructure, but foremost on the on-board equipment. It is estimated that ERTMS equipment consists in 70% of the investment for on-board equipment and 30% of the investment for track side equipment. As a consequence, it is absolutely essential to ensure that, provided that technical questions are solved, the cost-benefit analysis does not threaten the viability of the transport operators and particularly the railways undertakings.

**Q04. -Would the flexible approach to identifying projects of common interest, as proposed with the "conceptual pillar", be appropriate for a policy that, traditionally, largely rests on Member States' individual infrastructure investment decisions? What further advantages and disadvantages could it have, and how could it best be reflected in planning at Community level?**

■ YES - a flexible approach would be appropriate

- Please justify your choice (compulsory):

The concept of "conceptual pillar" allows to orientate Member States decision of investments towards "high European added-value" projects and to take into consideration some crucial criteria for the European transport policy (business orientation, environment, co-modality, modal shift, etc.). It goes without saying that this approach leaves the Member States free to decide on any other investment in transport infrastructure. However this flexibility should not encourage the implementation of road projects, as those are more a step by step achievement.

- Please allocate the advantages, as described above, to the following categories: (optional)

- Allows incorporating into TEN-T infrastructure-relevant aspects of a wide range of common transport policy measures on a "rolling basis";
- Allows to promote measures that stimulate efficient infrastructure use along TEN-T axes through several Member States or at Europe-wide scale (e.g. measures that may involve infrastructure works of smaller scope and are not reflected in major projects' maps; may cover actions like Green corridors or rail freight corridors; ITS applications );
- Allows for flexibility where necessary to facilitate the development of commercially viable services;
- Others (please specify above);

- Please allocate the disadvantages, as described above, to the following categories: (optional)

- Entails uncertainties regarding the specific definition of projects of common interest (consequently uncertainties in terms of cost, needs and possibilities for Community support);
- Others (please specify above);

- How could the "conceptual pillar" be best reflected in planning at Community level? (optional)

- Through objectives and criteria set out in the TEN-T Guidelines;
- Through links to relevant Community legislation;
- Through Comitology measures (Comitology is the involvement of the Member States Committee in the approval process);
- Other;

Comments:

- The concept of "axis performance" is central because it allows aligning the characteristics of the infrastructure from start till end of the line. The SNCF considers that this global vision, suggested by the European Commission, should also be applied to socio-economic studies of infrastructure projects, based on long distance traffic flows.

- The evolution toward a harmonisation of the track access charge systems in Europe is highly recommended. The structuring and the multiannual contracting of the track access charges are indeed a condition sine qua non to mobilise private funds. In addition, this multiannual visibility (on the level of track access charge and on the quality of the infrastructure) and its coherence with the

initial track access charge hypothesis are necessary for the railway undertakings to acquire the adapted rolling stock.

- The SNCF considers that it is up to the European legislators (Council and European Parliament) to decide about the strategic orientation of the transport infrastructure policy. However the technical details should be more precisely defined in the comitology procedure.

**Q05. - How can future challenges in the sectors of waterborne and air transport (especially ports, inland waterways and airports) as well as of freight logistics be best taken into account within the overall concept of the future TEN-T development? Do different requirements for freight and passenger transport require different treatment in the TEN-T policy? What further aspects relating to different transport sectors / common transport policy issues should be given attention? (optional)**

- The integration of long distance traffic as well as regional and urban traffic, while keeping into consideration the specificities of regional markets.

- The European Commission underlines accurately the necessity to take into consideration the different needs of passenger and freight transport. The SNCF raises the attention of the European Commission on the specific difficulties caused by the cohabitation of these two types of traffic (on mixed lines and in the bottlenecks) and the need to adopt a global approach and not a sequential one. The SNCF reminds its strong wish for the implementation, on a European level, of conditions allowing the competitiveness (and accordingly the development) of rail freight as well as the setting-up of a European high-speed network, which is the condition of a modal shift from road to rail for goods and passengers

- The development of a wider co-modality, in particular through the development of intermodal nodes should be encouraged. The European Community should support this development.

**Q06. - How can Intelligent Transport Systems in all modes, as a part of the TEN-T, enhance the functioning of the transport system? How can investment in Galileo and EGNOS be translated into efficiency gains and optimum balancing of transport demand? How can ITS contribute to the development of a multi-modal TEN-T? How can existing opportunities within the framework of TEN-T funding be strengthened in order to best support the implementation of the ERTMS European deployment plan during the next period of the financial perspectives? (optional)**

- The Intelligent Transport Systems in the railway sector should not be reduced to ERTMS. It should also take into account the research projects on other Intelligent Transport Systems, as for instance, the tracing of wagons, optimisation of traffic system, etc.

- The Intelligent Transport Systems should be deployed in all transport modes. The financial incentives to development and deployment should not only be attributed to the road sector.

**Q07. - Do shifting borderlines between infrastructure and vehicles or between infrastructure provision and the way it is used call for the concept of an (infrastructure) project of common interest to be widened? If so, how should this concept be defined (optional)**

- YES - the current concept of the infrastructure project of common interest should be widened;
- NO - there is no need for widening the current concept of the infrastructure project of common interest;
- No opinion

Comments:

- This shift should be done, so that the financing of the investments on the infrastructure could include their direct financial consequences on the investments of the others stakeholders.

For example, ERTMS equipment implies track side investments, but foremost puts a heavy financial burden as regards the on-board equipment of rolling-stock.

It is estimated that ERTMS equipment consists in 70% for on-board equipment and 30% for track side equipment. Thus, it is absolutely essential to ensure that, provided that technical questions are solved, the cost-benefit analysis does not threaten the viability of the transport operator. As a consequence, the investments of the railways undertaking in ERTMS on-board equipment should be able to benefit from TEN-T and national funds in order to facilitate the implementation of the European single market.

**Q08. - Would a core network (bringing together a priority network approach as referred to in Q3 and a conceptual pillar as referred to in Q4) be "feasible" at Community level, and what would be its advantages and disadvantages? What methods should be applied for its conception? (optional)**

■ YES - a core network approach would be feasible

- Please justify your choice:

According to the SNCF, a core network is feasible and would allow capturing the benefits of a network.

- To which categories would you allocate the main advantages:

- Strengthening the European planning approach;
- Capturing benefits of a network;
- Strengthening the network planning methodology;
- Combining the "traditional" infrastructure approach (essentially priority network) and a more flexible "conceptual" approach
- Establishing a strong basis for concentration of Community support (financial and non-financial);
- Other;

- To which categories would you allocate possible disadvantages? (optional)

- Difficulties regarding an appropriate planning method
- High degree of complexity and diversity of projects involved, requiring a too broad range of means for implementation
- Too much flexibility
- Too many network development priorities
- Other

- What basis could be used for its conception? (optional)

- Best practice from national methods (please specify above)
- Available research (please specify above)
- New research (please specify above)
- Expert groups
- Other (please specify above)

- Which are the three aspects that need to be given highest priority in the core network development method? (optional)

- Infrastructure needs in relation to the Lisbon strategy
- Climate change and other environmental objectives
- Common transport policy needs
- Member States' infrastructure master plans
- Financing capacities
- Most efficient infrastructure use
- Technological challenges and opportunities of the future (transport and energy, infrastructure and vehicle)
- Economic sustainability

Comments :

- The concentration of Community funding on a reduced number of "high European added-value" projects could allow, in the framework of the TEN-T policy review, to increase the co-financing rates and to induce a real acceleration and a catalytic effect to the realisation of the infrastructure;

- the taking into consideration of several Community financial perspectives for long projects.

**Q09.01.- Q09.01.- How can the financial needs of TEN-T as a whole - in the short, medium and long term - be established? optional)**

No answer

**Q09.02.- What form of financing - public or private, Community or national - best suits what aspects of TEN-T development? (optional)**

- The advisable funding forms vary from project to project and there is no general rule, which could apply for every infrastructure project. Nevertheless, the following principles can be held as generally true:

\* The majority of infrastructure projects can not be self-financed and need a financial participation from the public sector;

\* PPP can be a tool, in some cases, to accelerate the process by finding additional finances. However, when the risk of a project is high, PPPs raise the overall price of the project.

- The evolution toward a harmonisation of the track access charge systems is highly recommended. The structuring and the multiannual contracting of the track access charges are indeed a condition sine qua non to mobilise private funds. In addition, this multiannual visibility (on the level of track access charge and on the quality of the infrastructure) and its coherence with the initial track access charge hypothesis are necessary for the railway undertakings to acquire the adapted rolling stock

**Q10.01.- What assistance can be given to Member States to help them fund and deliver projects under their responsibility? (optional)**

No Answer

**Q10.02.- Should private sector involvement in infrastructure delivery be further encouraged? If so, how? (optional)**

As far as the infrastructure charging is viable for the transport operators, the SNCF has no opinion on how the private sector should be involved in infrastructure delivery.

**Q11.01- What are the strengths and weaknesses of existing Community financial instruments used for TEN-T? (TEN-T budget, Cohesion Fund, ERDF, EIB loans)? (optional)**

EIB loan rate do not appears incentivising enough to impulse a leverage effect.

**Q11.02- Q11.02.- Is there a need for new financial instruments (including "innovative" instruments)? (optional)**

No answer

**Q12.01.- How could existing non-financial instruments be improved? (optional)**

Europeans coordinators play already an important role and have influence. However, a reflexion on their roles and the ways to give them more power should be launched.

**Q12.02.- Which new non-financial instruments should be introduced, for what reason? (optional)**

- Instruments proposed (optional)

- Corridor coordination;
- Open method of coordination
- Sharing of best practices;
- Benchmarking;
- Setting of investment targets;
- Other ;

Comments:

The concept of "corridor coordination approach" should be introduced. This application of this concept, which is described in the Green Paper, associating of the relevant stakeholders (infrastructure managers, railway undertakings, customers, local and regional authorities) in the development of acceptable solutions that are technically, economically and financially feasible.

**Q13.- Which of the options for developing the TEN-T is the most suitable, and for what reason? (optional)**

- Option A: Dual layer: comprehensive network and priority projects (current structure);
- Option B: Single layer: priority projects - possibly in extended form;
- Option C: Dual layer: comprehensive network and "core network";
- No opinion;

**Q14.-Other comments or suggestions? (optional)**

The SNCF welcomes the following principles, as they are specified below, in order to achieve the expecting goals indicated in the Green Paper:

- the concentration of Community funding on a reduced number of "high European added-value" projects. In the framework of the TEN-T policy review, this principle could allow to increase the co-financing rates to induce a real acceleration and a catalytic effect to the realisation of the infrastructure;
- the business orientation of the central network (as it is developed in the third scenario of the Green Paper, through the "conceptual pillar");
- the contribution to the environment objectives and the fight against climate change as well as the integration of the carbon offset in the criterion of selection of TEN-T projects. The SNCF underlines the importance to integrate as objective to the future TEN-T policy to allow modal shift from road to rail;
- the development of wider co-modality, in particular through the development of intermodal nodes;
- the suppression of bottlenecks;
- the integration of long distance traffic as well as regional and urban traffic, while keeping into consideration the specificities of regional markets;
- The consideration of the different needs of passenger and freight transport. The SNCF raises the attention of the European Commission on the specific difficulties caused by the cohabitation of these two types of traffic (on mixed lines and in the bottlenecks) and the need to adopt a global approach and not a sequential one. The SNCF reminds its strong wish for the implementation, on a European level, of conditions allowing the competitiveness (and accordingly the development) of rail freight as well as the setting-up of a European high-speed network, which is the condition of a modal shift from road to rail for goods and passengers;
- the concept of "axis performance" allowing to align the characteristics of the infrastructure from start till end of the line. The SNCF considers that this global vision, suggested by the European Commission, should also be applied to socio-economic studies of infrastructure projects, based on long distance traffic flows;
- the concept of "corridor coordination approach", associating of the relevant stakeholders (infrastructure managers, railway undertakings, customers, local and regional authorities) in the development of acceptable solutions that are technically, economically and financially feasible;
- the evolution toward an harmonisation of the track access charge systems is highly recommended. The structuring and the multiannual contracting of the track access charges are indeed a condition sine qua non to mobilise private funds. In addition, this multiannual visibility (on the level of track access charge and on the quality of the infrastructure) and its coherence with the initial tack access charge hypothesis are necessary for the railway undertakings to acquire the adapted rolling stock;
- the application of Intelligent Transport Systems to all transport modes;
- the taking into consideration of several Community financial perspectives for long projects.