

Dear Sirs,

ProRail welcomes the opportunity to comment on the proposed TEN-T policy review.

1. Interoperability and Infrastructure

We find that the TEN-T initiative focuses heavily on infrastructure. In the Netherlands, a very densely populated country, we are exploring initiatives that not only rely on the construction of infrastructure but on finding extra capacity within the existing infrastructure. The requests from the sector/customers/railway undertaking are leading. So not only building infrastructure but also carrying out improvements in cross-border procedures and international capacity studies. The Corridor Rotterdam-Genoa is a good example of this approach. Member states should be in constant dialogue with the sector to decide on the development of the network and the transport policy as a whole.

ProRail supports the idea of a key European network in order to be able to facilitate the increasing demand for cross border traffic. The underlying networks should be the responsibility of the member states individually. We see risks in applying TEN-T principles to the entire national network since then the TSIs should be applicable to that network as well. This will take away the possibility to differentiate by building customer oriented solutions on some parts of the network. Also some European systems prove quite expensive and applying those on parts of the network that do not contribute to interoperability seems on logical to us.

2. Market oriented and territorial cohesion

With full respect to other policy goals like territorial cohesion, ProRail thinks that market developments and demands should be leading in developing TEN-T. Alleviating bottlenecks, connecting main ports, environmental performance, interoperability between transport modes, and harmonizing EU legislation should be key in establishing the network. TEN-T funds should be used to improve on performance in these areas.

Thank you once again for the opportunity to provide the EC with input. We feel encouraged by the EC in our commitment to create more capacity and contribute to a more sustainable European transport network and are available to bring this about, jointly with our partners is the railway sector and policymakers at the national and EU level.

Should you have any comments or questions please do not hesitate to contact us.

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