



The future of Trans-European Transport Network Policy COM(2010) 212

- SNCF contribution to the public consultation -

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Executive Summary :

SNCF welcomes this consultation on the future of TEN-T as a decisive reflexion on the implementation of efficient and sustainable transport infrastructures matching the dimension and the ambition of the EU transport policy.

SNCF supports strongly the objective to concentrate the European funds on a smaller number of projects, in order to avoid the sprinkling of TEN-T funds and induce a real acceleration effect to the realisation of the core network.

The identification of this core network with high European added-value has to be based on a selection of some decisive criteria, weighted on a transparent manner. SNCF recommends that this weighting favours the 4 following criteria: sustainable development; global socio-economic assessment by axis or project; removal of bottlenecks / missing links and optimisation of the existing network.

The recent budgetary crisis, which impacted the Member States of the European Union calls for a greater efficiency of the use of the available European budget for transport issues. Thus, the creation of a European agency responsible for coordination and decision on the European transport funds would have significant advantages in terms of transparency, coherence, simplification and efficiency.

Questions of the consultation:

QUESTION 1 - Are the principles and criteria for designing the core network, as set out above, adequate and practicable? What are their strengths and weaknesses, and what else could be taken into account? 4

QUESTION 2 - To what extent do the supplementary infrastructure measures contribute to the objectives of a future-oriented transport system, and are there ways to strengthen their contribution? 11

QUESTION 3 - What specific role could TEN-T planning in general play in boosting the transport sector's contribution to the "Europe 2020" strategic objectives? 12

QUESTION 4 - In which way can the different sources of EU expenditure be better coordinated and/or combined in order to accelerate the delivery of TEN-T projects and policy objectives? 12

QUESTIONS 5 and 6 - How can an EU funding strategy coordinate and/or combine the different sources of EU and national funding and public and private financing? Would the setting up of a European funding framework adequately address the implementation gap in the completion of TEN-T projects and policy objectives? 14

QUESTION 7 - In which way can the TEN-T policy benefit from the new legal instruments and provisions as set out above? 14

QUESTION 1 - Are the principles and criteria for designing the core network, as set out above, adequate and practicable? What are their strengths and weaknesses, and what else could be taken into account?

SNCF supports strongly the objective to concentrate the European funds on a smaller number of projects, in order to avoid the sprinkling of TEN-T funds and induce a real acceleration effect to the realisation of the core network. Thus, SNCF encourages the European decision-makers to follow the objective of the Commission:

“Planning a core network is not meant to initiate a new infrastructure programme of immense scope neither: ensuring continuity for ongoing projects, giving due attention to the removal of key bottlenecks and building largely on existing infrastructure, it aims at becoming the basis for an efficient, less carbon intensive, safe and secure transport system.”

SNCF welcomes the business orientation of the core network, which will enable the development of a European transport network adapted to existent and forecast flows, matching the needs of the customers. SNCF also supports the transition from TEN-T by isolated projects to the establishment of a European trans-national network.

The selection criteria of the core network, as presented in the consultation paper, is relevant. However, its definition has to be specified and the criteria must be weighted according to the objective of decarbonisation of transports.

1. The main selection criteria and its weighting

The European Commission has identified several important criteria to select these projects and axis with high European added-value.

These criteria should be further detailed and their weighting should be transparent. The objective of the European Commission to decarbonise transport should thus appear more clearly as the main strategic orientation. The weighting of the other criteria should be clear for the stakeholders.

1. The main criterion in the selection of the axis and projects of the core network must be the sustainability

SNCF considers that the requirements in terms of sustainable development must be decisive for the selection of the core network.

- a) The future TEN-T network must be primarily focused on the reduction of green-house gas emissions of transports

The future TEN-T policy must contribute to the fight against climate change, in particular to the reduction of 20% of green-house gas emission (ideally 30%¹) by 2020, in order to limit the global warming to 2°C.

SNCF recommends the use of an indicator to evaluate the “carbon intensity” of the axes and projects, allowing to classify them and to identify the most performing ones, by traffic type. Such indicators can be established on the following ratio:

Indicator of “carbon intensity”	=	$\frac{\text{emitted green house effect}}{\text{passenger/kilometre}}$	or	$\frac{\text{emitted green house effect}}{\text{ton/kilometre}}$
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SNCF underlines the importance to integrate as an objective for the future TEN-T policy the set-up of conditions allowing the modal shift from road to rail.

¹ SNCF welcomes the recent positions of the French and German governments both in favour of a 30% reduction of green house gas emissions and strongly encourages that this objective becomes the European target of the climate policy.

On the mid term, SNCF suggests that complete carbon assessment of TEN-T projects become mandatory, for all modes, on the entire route.

For the first time in France, greenhouse gas emissions resulting from phases of conception and realisation of the new high-speed railroad infrastructure (line Rhine-Rhône) but also both stations, supplementary trains but also maintenance installations, were closely examined. These results were then completed by the estimations of greenhouse gas emissions during the first 30 years of commercial exploitation and maintenance of the new line after its opening, taking into account the forecast number of passengers (including the additional passenger linked to modal shift from air or road to rail). This carbon assessment indicates the time needed to neutralise the emissions generated by the conception, the construction and the operation of the line thanks to the avoided emissions thanks to the modal shift².

TEN-T will have to contribute to the fight against climate change by establishing the conditions of the development of clean modes of transport, including railways. This new policy will also have to adapt to the current global warming and make the transport infrastructure more resilient to extreme climate events (floodings, increase of the sea level, heat waves, etc.)

b) The future TEN-T must reach a greater fossil fuels independence

TEN-T must prepare the European transport system to the evolutions of the energy sector. In order to be more sustainable, TEN-T must enable an energy-efficient mobility and reach greater fossil fuels independence of the transport system.

c) The future TEN-T must limit its negative externalities and internalised those, which can be avoided

TEN-T will have to limit or reduce the impact of its negative externalities, in particular

- Local atmospheric pollution;
- Congestion;
- Accidents;
- Noise;
- Land cover;
- Soil and water pollution;

TEN-T will have to internalise all external costs that can not be avoided and this for all modes of transport.

To be sustainable, the future TEN-T network must internalise all social impacts and take into consideration the cost of accidents, both for individuals and for the society.

The criterion of biodiversity should only be evaluated on the basis of concrete projects. It has to be adapted to the local characteristics. In addition, the criterion should go hand in hand with a viable level of business sustainability and the safety of circulations on the infrastructure.

2. The global socio-economic assessment must remain an important criterion in the selection of axis and projects

The selection of axes and projects of the future TEN-T core network must be based on the results of global socio-economic assessments. These analyses must take into consideration the existing traffic, the forecast flows and the potentialities of modal shift toward more sustainable transport modes.

² As for the Rhin-Rhône High Speed Line, avoided emissions thanks to the modal shift are going to become superior to emissions generated by the conception, the construction and the operation of the LGV as from its 12th year of operation. The LGV will thus have carbon profitability⁴ as from 2024 which is going to increase year by year. Over 30 years, it is 3 895 000 tons of CO₂ that will be avoided.

SNCF considers that the criterion proposed by the European Commission of “Minimisation of investment, maintenance and operational costs” is interesting and that infrastructure managers in Europe should be incited to reach this objective. Nevertheless, this criterion must be integrated to a larger reflexion and must be taken into consideration in the global socio-economic assessment of the infrastructure.

The future TEN-T must associate the customers of the infrastructure (e.g. the railway undertakings) to ensure the « business-orientation » and the full efficiency of the corridors for the final customers. For example, during the construction of the Perpignan-Figueras tunnel, railway undertakings have been consulted and have formulated their opinions on the technological choices relative to this new line. These opinions have not been taken into consideration and the tunnel has not lead to an increase of traffic matching expectations. In this case, the development of freight transport is limited by the level of track access charge, the lack of interoperability (unique ERTMS version deployed in this tunnel, not directly compatible with the other versions in Europe) and the inclination of the slope (necessitating an extra locomotive for heavy freight trains).

3. The removal of bottlenecks / the creation of the missing links

These two objectives require a reinforced coordination in the programming of infrastructure investments. The removal of bottlenecks and missing links are key both for the establishment of a European efficient transport network and for the European territorial cohesion. Special efforts must be made to connect transport infrastructures with the new Member States of the EU.

Bottlenecks and missing links are the weakest links, which determine the performance level of the whole corridor. In this framework, the future TEN-T must be conceived with the performance of the whole European network in mind, and not the national ones. The future TEN-T policy must remove all bottlenecks and build the missing links, not matter if they are trans-border or national, as long as their impact is European.

4. The TEN-T must seek the optimisation of the network

a) The optimisation of the existing network and the measures of European coordination and harmonisation will allow an increase of the available capacity on the existing infrastructure

Investments on the existing infrastructure can lead to an increase of capacity availability on the future TEN-T network, as for example the development of 1000m trains (construction or enlargement of holding sidings, platforms) or the harmonisation of performances along a route (speed, weight, length) for each type of market.

It is also possible to increase the efficiency of the infrastructure use by requiring more transparency on the operational rules and more coordination of the infrastructure managers (in particular for the planning of works on the infrastructure, investment planning, international paths, etc.). The impact of this lack of harmonisation is currently underestimated.

b) The TEN-T network should be interoperable to allow the free flow of trans-European traffics, on an harmonised basis and without threatening the economic viability of some actors

Every national operator must be able to operate on other Member States' domestic markets without being confronted by artificial barriers, whether technical, legal, regulatory or institutional. Delays in implementation, problems with rolling stock homologation must be removed. The introduction of new technical and operational standards that may fix new national barriers to market entrance must be avoided.

The TEN-T network must become interoperable and the economic balance of these investments should remain positive both for the infrastructure managers and the railway undertakings. Thus, ERTMS can only become a mandatory criterion for the TEN-T network if the following two prerequisite are met:

On the one hand, the co-funding of ERTMS must reach the current rates that are stipulated in the European legislation (50% for locomotives). The deployment of ERTMS requires heavy investments on the infrastructure, especially on board the trains. It is thus crucial to ensure that these investments are not threatening the viability of railway undertakings³.

On the other hand, the homogenisation of the versions that are deployed on the TEN-T infrastructure is necessary. Currently, the national deployment plans are not harmonised and do not protect the railway undertakings and the leasing companies from the risk of incompatible version along the same corridor⁴. Without harmonisation of the trial and homologation procedures, the imposition by the TEN-T policy of the ERTMS equipment will meet serious technical and economic difficulties, as well as delays.

It is necessary that the criteria for the selection of the future TEN-T core network is weighted according to the main strategic objectives. SNCF recommends that the weighting is done according to the following 4 criteria:

- Priority 1: Sustainable development and the reduction of green house gas emissions;
- Priority 2: Global socio-economic assessments;
- Priority 3: Removal of bottlenecks / missing links;
- Priority 4: Optimisation of the network.

2. Summary of the selection criteria for the TEN-T core network

Criteria proposed by the European Commission	Positive Points	Negative points	Criteria to be added according to SNCF
Multimodality	Multimodality must be encouraged to allow the greater ecological and socio-economic efficiency of each transport mode. TEN-T funds can have decisive impact for the development of multimodal nodes (for goods –integration of multimodal platforms, access to ports, etc. - but also for passengers – stations, railway connections to airports, etc.).		The objective of modal shift toward the most environmentally friendly transport modes has to be clearly set, in order that multimodality allows the development of a sustainable transport system in Europe.
Interconnectivity	Concerning ticketing and information, it is indeed desirable that a greater interconnectivity is reached.		The development of these innovative technologies should be the opportunity to solve some complex problems, for example on the challenges of interoperability and interconnectivity of ticketing and information systems, while respecting the economic relevance and the commercial strategies in a competing market.

³ SNCF is nowadays the only railway undertaking to operate international passenger transport with ERTMS (Thalys). This experience reveals the difficulties linked to the heterogeneity of ERTMS versions, which leads to unreasonable costs of equipment. The ERTMS deployment is even less economically sustainable for the rail freight operators.

⁴ For example, in the Netherlands, three different versions of ERTMS are deployed on the rail infrastructure.

Criteria proposed by the European Commission	Positive Points	Negative points	Criteria to be added according to SNCF
Optimisation of the network	<p>Investment on the existing infrastructure can lead to an increase of capacity availability on the future TEN-T network, as for example the development of 1000m trains (construction or enlargement of holding sidings, platforms) or the harmonisation of performances along a route (speed, weight, length) for each type of market.</p> <p>It is also possible to increase the efficiency of the infrastructure use by requiring more transparency on the operational rules and more coordination of the infrastructure managers (in particular for the planning of works on the infrastructure, investment planning, international paths, etc.).</p>	<p>The problem of allocation and operational management of infrastructure resources (paths) arises where freight, long-distance passengers and regional services coexist. The debate surrounding regulation of freight corridors requires wider thoughts.</p> <p>These cases of saturated shared infrastructure must be the subject of clear political and economic choices at a supranational level.</p>	
Interoperability and improved efficiency	<p>Every national operator must be able to operate on other Member States' domestic markets without being confronted by artificial barriers, whether technical, legal, regulatory or institutional. Delays in implementation, problems with rolling stock homologation must be removed.</p> <p>The introduction of new technical and operational standards that may fix new national barriers to market entrance must be avoided.</p>	<p>The TEN-T network must become interoperable and the economic balance of these investments should remain positive both for the infrastructure managers and the railway undertakings.</p>	<p>The removal of bottlenecks and the establishment of missing links should be an objective of the future TEN-T network. This requires a reinforced coordination in investment planning, in order to optimise the use of the transport infrastructures.</p>
Sustainable development	<p>The future TEN-T network must be sustainable, and contribute in particular to the reduction of green house gas emissions of transport, independence toward fossil fuels, minimisation of environmental externalities and accidents.</p> <p>SNCF considers that this criterion of sustainability must be decisive in the selection of the core network.</p>		<p>TEN-T should strive at limiting all negative externalities of all transport modes and internalise those, which cannot be avoided.</p>
Biodiversity	<p>It is important to take into consideration biodiversity in the conception of each infrastructure project, according to specific local characteristics.</p>	<p>Considering its specificity, this criterion should be evaluated at local level.</p>	

Criteria proposed by the European Commission	Positive Points	Negative points	Criteria to be added according to SNCF
Quality of service	The quality of services must be made possible by the TEN-T network thanks to performing and robust infrastructures allowing the exploitation of efficient and sustainable services, on the entire route.	<p>The path quality must be guaranteed and conform to the path pricing because its performance (including in particular the speed and flows, resilience and infrastructure services) directly impacts rail service quality. This guarantee is nowadays not always granted.</p> <p>SNCF encourages the set-up of common performance regimes all over Europe, in order to avoid the juxtaposition of different or even contradicting national performance regimes along the TEN-T network.</p>	
Security and safety	<p>Questions of safety and security on the TEN-T impact both the infrastructure and the transport services. The safest modes of transport must be developed on the TEN-T network.</p> <p>The future TEN-T must ensure the deployment of coherent systems among States and along TEN-T infrastructures. It can also encourage the installation of surveillance and intrusion detection devices (electronic surveillance, air surveillance, vegetal fences or other fences adapted to the environment, circuit protection for electric installations, etc.), in order to reinforce the safety and security of infrastructures and their exploitation.</p>		
Intelligent technologies	<p>Intelligent Transport Systems (ITS) must be applied to <u>all</u> transport modes.</p> <p>In the railway sector, ITS cannot be resumed to ERTMS, but should take into consideration research projects as for instance systems of tracking and tracing, systems to increase the free flow of traffic, etc.</p> <p>ITS must be coherent and interoperable between transport modes.</p>		
Minimisation of investment, maintenance and operational costs	Infrastructure managers in Europe should be incited to reach this objective.	<p>This criterion must be integrated to a larger reflexion and must be taken into consideration in the global socio-economic assessment of the infrastructure.</p> <p>To ensure the effective set-up of this objective, organisational and regulatory measures are necessary (performance regime, infraction proceedings, etc.).</p>	

Criteria NOT proposed by the European Commission	Positive Points	Negative points	Criteria to be added according to SNCF
	<p>The selection of axes and projects of the future TEN-T core network must be based on the results of global socio-economic assessments.</p> <p>These analyses must take into consideration the existing traffic and the forecast flows and the potentialities of modal shift toward more sustainable transport modes.</p>		Global socio-economic assessment
	<p>The concept of « axis performance » allowing to align the characteristics of the infrastructure from start to end of the line, in order for them to be consistent. SNCF considers that this global vision, suggested by the European Commission, should also be applied to the socio-economic studies of infrastructure projects, on the basis and on the long distance traffic flows.</p>		Concept of « axis performance » allowing to align the characteristics of the infrastructure from start to end of the line
	<p>The future TEN-T must associate the customers of the infrastructure (e.g. the railway undertakings) to ensure the « business-orientation » and the full efficiency of the corridors for the final customers.</p>		Association of operators to TEN-T governance
	<p>The volcanic eruption that occurred in April 2010 and the closure of the European airspace made clear that it is crucial for Europe to invest in high speed transport services to guarantee sustainable mobility to the European citizens.</p> <p>The economic and operational conditions should be set-up for the development of European high speed services.</p>		Resilience of transport systems

QUESTION 2 - To what extent do the supplementary infrastructure measures contribute to the objectives of a future-oriented transport system, and are there ways to strengthen their contribution?

1. The innovation should not hide the importance of investment in the available technologies

Innovation is one of the three pillars of tomorrow's sustainable transport system; together with demand mitigation and modal shift (« innovate, mitigate & shift »).

The current focus on the contribution of innovation should not hinder the investment in existing and proven technologies (for example, the electrification of lines, the building of rail access to airports, the development of long trains up to 1000m thanks to the increase of platforms and holding sidings, etc.).

2. The future TEN-T should promote the development of innovative and interoperable technologies for all modes of transport

Intelligent Transport Systems (ITS) must be applied to all transport modes and be eligible for European funding in similar ways. ITS must be conceived in such a way that it encourages modal transfer toward the most sustainable and energy efficient transport modes.

The development of these innovative technologies should be the opportunity to solve some complex problems, for example on the challenges of interoperability and interconnectivity of ticketing and information systems, while respecting the economic relevance and the commercial strategies in a competing market.

In the railway sector, ITS cannot be resumed to ERTMS, but should take into consideration research projects as for instance systems of tracking and tracing, systems to increase the free flow of traffic, etc.

Innovations could be stimulated in the field of diesel and hybrid motorisation, security (detection devices of explosives on the tracks, of copper thieves, of intrusion in tunnels, etc.) or maintenance (predictive maintenance systems).

Thus SNCF considers that examples of innovative projects drawn by expert group n°3⁵ on ITS considerably underestimate innovation potential in the railway sector. SNCF also regrets that the preliminary work has not sufficiently involved railway sector experts.

ITS must be coherent and interoperable between transport modes.

⁵ (pages 80 and 81 of the expert groups' report)

QUESTION 3 - What specific role could TEN-T planning in general play in boosting the transport sector's contribution to the "Europe 2020" strategic objectives?

TEN-T, both in its construction and through the benefits it brings for the mobility of goods and persons, is a driver of employment, wealth and competitiveness. TEN-T is the basis for a performing and sustainable European economy and participates to the reinforcement of the EU in the world competition.

The future of TEN-T policy is crucial to orientate the European growth toward a low carbon economy. Currently, the green house gas emissions of the transport sector are growing, while the other sectors have already started a decrease of their carbon footprint.

TEN-T enables territorial cohesion at European level and the free movement of goods and persons in the European Union ("inclusive growth").

QUESTION 4 - In which way can the different sources of EU expenditure be better coordinated and/or combined in order to accelerate the delivery of TEN-T projects and policy objectives?

1. The concentration of Community funding on a reduced number of "high European value-added" projects of the core network

In the framework of the TEN-T policy review, the real co-financing rates of TEN-T projects should reach more systematically the maximum rates indicated in the regulation, in order to induce a real acceleration and a catalytic effect to the realisation of the infrastructure. Currently, co-financing rates of TEN-T priority projects rarely reached the rates set in the European regulation.

In order to limit the sprinkling of TEN-T funds, SNCF recommends that only the projects belonging to the core network could be co-financed via this fund.

2. The creation of a European agency responsible for coordination and decision on the European transport funds

The recent budgetary crisis, which impacted the Member States of the European Union calls for a greater efficiency of the use of the available European budget for transport issues. The sprinkling of European funds and the increase of non-harmonised administrative procedures to apply, raise the price and make it more complex the access to European funding.

The creation of a European agency responsible for coordination and decision on the European transport funds⁶ could have several advantages:

- Limiting the « sprinkling » of European funds and reinforcing the catalyst effect of the European action ;
- Orientating the European funding toward clear and coherent objectives ;
- Bringing together the eligibility criteria and the types of projects that are co-funded by the EU ;
- Having a true European planning ;
- Unifying and harmonising the procedures to apply for European funding ;
- Reinforcing transparency on the use of the European budget for the citizens.

Additional resources, such as the revenues of the future Eurovignette directive could be added to these funds.

⁶ SNCF regrets that the idea of a single fund has been rejected. However, the creation of a European agency for coordinating and deciding on the European transport funds would be a necessary first step.

3. Harmonisation of track access charges

In compliance with SNCF position paper on the track access charges (January 2010), the evolution toward a harmonisation of the track access charge systems is requested.

The structuring and the multi-annual contracting of the track access charges are indeed a condition sine qua non to mobilise private funds. All the more, this multi-annual 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 necessary rolling stock (both in quantity and quality).

4. The use Public Private Partnership (PPP), when adapted to the infrastructure project

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. PPPs offer some flexibility for the financing plans. However, they cannot hide the impact on the long run on public finances
- PPP can be a tool, in some cases, to accelerate the process by finding additional finances. However, private partners ask for a higher payment on the capital (and on the cost of the risk). Thus, PPPs can raise the overall price of the project. To the contrary, the association of these private partners can be advantageous to help anticipating the cost of hazards before the launch of the project, and to share the risks between actors.

5. The reinforcement of the role of European coordinators

European coordinators are bondsmen of the coherence along an axis. They play a central role between local, national and European authorities as well as with stakeholders.

European coordinators should be granted an additional legitimate towards stakeholders and have the power of decision on the progress of the decided projects. This role of project implementation could help guarantying the progress of the project and respecting the timetable.

QUESTIONS 5 and 6 - How can an EU funding strategy coordinate and/or combine the different sources of EU and national funding and public and private financing? Would the setting up of a European funding framework adequately address the implementation gap in the completion of TEN-T projects and policy objectives?

Only set-up of an ambitious TEN-T policy, truly European, sustainable and based on solid socio-economic assessments, will be able to attract the necessary public and private funding and have a leverage effect.

Thus, the reinforcement of the role of European coordinators and the creation of a European agency responsible for coordination and decision on a single European transport fund (cf. question 4) have a significant importance, if they orientate European funds toward European sustainable projects and have a leverage effect on the behaviours of other public and private actors.

QUESTION 7 - In which way can the TEN-T policy benefit from the new legal instruments and provisions as set out above?

SNCF is in favour of the combination of TEN-T guidelines and the TEN-T “financial regulation”, in order to strengthen the link between TEN-T policy priorities and financial resources.

SNCF considers that any discussion on the basis of the map of priority projects should be avoided. SNCF fears that it would lead to a dispersal of the projects on a political basis and not on the above mentioned criteria basis.

The idea of the European Commission to clarify the responsibilities of Member States is positive. States play a capital role in the implementation of TEN-T projects, at all stages (planning, financing, implementing, evaluating).