



Scandria® Alliance Position Paper

referring to the

Proposal for a Regulation
of the European Parliament
and of the Council on Union guidelines
for the development
of the trans-European transport network

published on 14 December 2021

(COM(2021) 812 final)

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Introductory remarks

The Scandria®Alliance is a collaboration of cities and regions between Scandinavia and the Adriatic Sea based on an "Interregional Agreement on Establishing Scandria®Alliance for Territorial Cooperation along the Scandria®Corridor" concluded in March 2019.

- Helsinki-Uusimaa Regional Council,
- City of Turku,
- Region Örebro County,
- Eastern Norway County Network,
- Free and Hanseatic City of Hamburg,
- Ministry of Transport and Mobility Transition,
- Capital Region Berlin-Brandenburg,
- Kvarken Council EGTC,
- Emilia-Romagna Region,
- Logistics Initiative Hamburg,
- Open ENLoCC,
- Technical University of Applied Sciences Wildau,
- Port of Hamburg Marketing,
- Unioncamere Veneto

Our common vision is to connect regions, communities and economies through clean and smart transportation. The thematic scope of the Scandria®Alliance's cross-border and transnational cooperation includes all issues related to climate-smart multimodal transport connectivity at the interface to sustainable regional development.

In May 2021, the Scandria®Alliance took part in the public consultation and contributed a [position paper to the TEN-T revision process](#).

In this paper, the Alliance highlighted major issues that – according to its members – should be taken into account when revising the TEN-T regulation.

Issues addressed in the 2021 position paper were:

- **Urban Nodes**
– first and last mile connections to the core network corridors,
- **Multimodal transport chains,**
- **Green and smart mobility**
for freight and passengers by strengthening the multi-fuels approach,
- **Cross-border transport**
and highlighted sections of the corridor as well as
- **Governance.**

In general, the Scandria®Alliance members very much appreciate the proposal of the TEN-T regulation as published on 14 December 2021. It addresses many relevant challenges that need to be tackled to build a cleaner, multimodal and spatially balanced trans-European transport network.

Following the structure of our previous position paper, this document suggests amendments that could further improve the effectiveness and accuracy of the proposed regulation. It is based on a joint assessment of the proposed regulation by the members of the Scandria®Alliance. We hope to constructively contribute to a regulation that – once implemented – will further push Europe towards a sustainable, integrated transport network.

Urban Nodes – first and last mile connections to the CNC

Article 39 “Urban nodes components”

The Scandria®Alliance members appreciate the stronger emphasis that the Commission has put on urban nodes by dedicating section 7 of the regulation exclusively to them. The Scandria®Alliance members also appreciate the broadened concept of urban nodes as referred to in article 39 as comprising, in particular: “access points to the trans-European transport network” and “first and last mile connections between and to these access points” as well as the reference given to urban nodes in article 35 (c) “located within or in the vicinity of an urban node;” in relation to multimodal freight terminals. Altogether, the proposal’s provisions referring to urban

nodes confirm our understanding of a **functional approach to urban nodes** that is not limited to administrative borders of the nodes listed in annex II of the proposal. This includes multimodal freight terminals outside the strict administrative unit, provided they are functionally linking the TEN-T network with urban transport, as well as a functional approach to integrated polycentric areas not requiring each urban node as defined in annex II to the regulation to present a separate SUMP but enabling the establishment of an integrated SUMP for functionally interlinked urban nodes.

Article 39 “Urban nodes components”

The Scandria®Alliance members support the requirement to adopt Sustainable Urban Mobility Plans (SUMPs), including “notably measures to integrate the different modes of transport, to promote efficient zero-emission mobility including sustainable and zero-emission urban logistics, to reduce air and noise pollution and that takes long-distance trans-European transport flows into consideration” in accordance with the conditions set out in annex V to the regulation. Especially the notion of “and zero-emission urban logistics” is very welcome. In the past, SUMPs tended to stronger emphasize urban passenger transport, whereas the instrument of Sustainable Urban Logistics Plans (SULP) was developed to address urban logistics. Thus, the **comprehensive understanding of urban mobility including logistics** as an integral part as described in article 40 is very much in line with the Scandria®Alliance members’ expectations.

Eventually, we suggest to consider the notion of Sustainable Urban Logistics Plans (SULP) within the regulation as it consequently refers to the needs of freight transport and its interaction with the TEN-T network.

Possibly, article 40 (b) of the regulation might be amended as follows or likewise:

“(i) adoption of a sustainable urban mobility / **logistics** plan (SUMP / **SULP**) that includes notably measures to integrate the different modes of transport, to promote efficient zero-emission mobility including sustainable and zero-emission urban logistics, to reduce air and noise pollution and that takes long-distance trans-European transport flows into consideration”.

Furthermore, the Scandria®Alliance would like to ask the European Commission to take notice of **specific needs of cross-border urban nodes**. These nodes, stretching across borders, are facing challenges associated with infrastructure that is functionally linked, but located in different Member States. Examples for such cross-border urban nodes on the Scandria®Corridor are Greater Copenhagen (Denmark, Sweden) and Kvarken Ports, which consists of ports in Umeå (Sweden) and Vaasa (Finland).

The Scandria®Alliance members would thus appreciate if the specifics of such cross-border urban nodes were more efficiently taken into account when implementing and further developing the TEN-T policy to fully use the synergies resulting from genuinely sharing functions, economic activity and governance in cross-border areas.

Multimodal transport chains

The Scandria®Alliance members highly appreciate the emphasis put on multimodal transport in section 6 “Infrastructure for multimodal freight terminals”. It is regarded an important step towards a truly multimodal transport system.

The Scandria®Alliance members would like to highlight that appropriate infrastructure measures and the shift to sustainable modes of transport need to be accompanied by policy measures to create **a level playing field of different modes of transport**, e.g. with regard to track fees or customs operations along international logistic chains. Thus, it would be highly appreciated if the effect of measures supported in the TEN-T on modal shift could be evaluated when conducting the market and prospective analysis including proposals for policy measures if relevant.

Furthermore, as an Alliance of regions and cities, we would like to emphasise that **regions and cities have a key role in designing the multimodal transport system**, being responsible for regional, urban and transport planning. The members of the Scandria®Alliance would thus appreciate a notion of cities and regions when requiring member states to involve relevant stakeholders into the process of conducting the market and prospective analysis and elaborating a respective action plan as referred to in article 35, paragraphs 3 and 4.

With a view to this, the members of the Scandria®Alliance suggest to consider the following amendment to article 35 (3):

“Member States shall consult **responsible local and regional authorities as well as** shippers, transport and logistics operators which operate on their territory. They shall take into account the results of the consultation in their analysis”.

Green and smart mobility for freight and passengers by strengthening the multi-fuels approach

The members of the Scandria®Alliance appreciate the stronger emphasis on sustainable transport in the proposal of the regulation, putting sustainable transport as first objective and defining clear and concise requirements for clean and sustainable transport with reference to the Regulation on alternative fuels infrastructure (COM(2021) 559 final, AFID). The members welcome the requirements related to the provision of alternative fuels infrastructure for the core and the comprehensive network in all modes of transport. We are confident that these concise requirements in the TEN-T as well the alternative fuels infrastructure regulation will boost the deployment of clean fuel infrastructure and hence speed up the transition towards zero emission mobility throughout Europe.

The members of the Scandria®Alliance, however, ask the Commission to take notice of the fact that liquid biogas (LBG) or compressed biogas (CBG) produced from renewable sources such as waste, agricultural and forestry residues can provide a substantial contribution to decarbonizing transport. Sharing the opinion expressed by the European Biogas Association and the CPMR North Sea Commission, the Scandria®Alliance members therefore ask the Commission to **acknowledge the potential of LBG and CBG from renewable sources**, especially in heavy-duty and maritime transport within the TEN-T regulation and the AFID. LBG infrastructure should be built according to the minimum standards (every 400 km) by 2025 in every country and CBG should be extended likewise.

Cross-border transport and highlighted sections of the corridor

The Scandria®Alliance members welcome the focus on cross-border sections as expressed in article 12 (d). From the perspective of Scandria®Alliance member regions and cities, enhanced **cross-border links strongly support the competitiveness of regions** by providing improved access to markets, workforce and services. The experience of the Scandria®Alliance members regions and cities clearly shows that developing cross-border links is far more challenging compared to those located within one country. It needs to be aligned in national transport policies and to be implemented according to the binding national legislative framework. Given the strong emphasis on cross-border sections in the regulation, TEN-T policy has the potential to foster the improvement of cross-border links especially in the railway network.

Thus, the members of the Scandria®Alliance are happy to see that the European Commission is continuing its support to core infrastructure projects such as the Fehmarnbelt Fixed Link and the Brenner Base Tunnel. In this regard, we would underline the necessity to adequately upgrade the hinterland connections of these major infrastructure investments to fully exploit their potential.

The Scandria®Alliance highly appreciates the prolongation of the Scandinavian-Mediterranean and North Sea – Baltic Core Network Corridors to Northern Scandinavia. Furthermore, the Scandria®Alliance members are very pleased to see that the following important cross-border links are continually addressed in the regulation or have been added:

- **Oslo (Norway) – Gothenburg (Sweden):**

Currently, rail freight and passenger transport is not competitive due to low speed. The upgrade of the single track to double track would enable a modal shift from road and plane to rail. At the moment, close to 97% of all freight between Oslo and Gothenburg is road transport, with over 70% of lorries returning empty.

- **Jutland Corridor: Oslo (Norway) – Hirtshals / Frederikshavn (Denmark) – Hamburg**

(Germany): Scandria®Alliance member welcome the extension of the Scandinavian - Mediterranean core network corridor by the stretch Fredericia – Aarhus – Aalborg – Hirtshals/Frederikshavn referred to herein as “Jutland Corridor”. The Jutland corridor via Hirtshals is the shortest freight route between Southern Norway and Hamburg. It has a potential to take a larger share of the freight transports by rail and constitutes a relief to the Oslo-Gothenburg corridor, providing more resilience for transport between Scandinavia and continental Europe also after the completion of the Fehmern Belt tunnel.

- **Berlin (Germany) – Szczecin (Poland):** The inclusion of Berlin-Szczecin cross-border rail, inland waterway and road connection into the North Sea-Baltic Core Network Corridor will strengthen multimodal transport between Scandinavia, Western Poland and Central Europe as well as the integration of the German-Polish cross-border area between Berlin and Szczecin.

- **Helsinki (Finland) – Tallinn (Estonia):** It is well acknowledged that the Helsinki-Tallinn fixed link is included in the TEN-T network as study idea, thus assuring that future planning steps are considered when implementing the TEN-T network, especially linked to the Rail Baltica.

Cross-border transport and highlighted sections of the corridor

In addition, the Scandria®Alliance members would like the European Commission to consider following adjustments to the alignment of cross-border sections in the trans-European network and the core network corridors:

- **Stockholm (Sweden) – Oslo (Norway):**

The members of the Scandria®Alliance ask the Commission to consider including the cross-border section Stockholm – Oslo in the Scandinavian-Mediterranean Core Network Corridor and adjust its alignment and parameters to fully unleash the section's potential for sustainable regional development. Specifically, following amendments are asked for:

- **Stockholm – Örebro via Västerås:**
existing rail line to be added to TEN-T and upgraded to high speed,

- **Örebro – Karlstad:**
new section Örebro-Kristinehamn to be included in TEN-T,

- **Kristinehamn – Karlstad:**
existing core rail network to be upgraded to high speed,

- **Karlstad – Arvika:**
existing core rail network to be upgraded to high speed,

- **Arvika – Oslo:**
new section to the Norwegian border to be included in TEN-T.

The suggested amendments make sure that the capitals Stockholm and Oslo as well as a number of intermediate urban nodes would be linked to the TEN-T network providing full access to human capital and entrepreneurial capacities. Due to the cross-border nature of the project, there is potential to make the project a flagship project coordinated by the European Coordinator for the Scandinavian-Mediterranean Corridor.

- **Vaasa (Finland) – Umeå (Sweden):**

We kindly ask the commission to include in the TEN-T network the port of Vaasa, which is a maritime port of significant importance in freight, passenger and transit transport, as well as its connection by rail to Tampere.

Port of Vaasa is part of Kvarken Ports, which is a cross-border joint operation between Umeå (Sweden) and Vaasa (Finland), their ports and municipalities, supporting the interoperability between transport modes and Member States across the Kvarken Strait. Together, port investments in Umeå and Vaasa will reach 100 million euros in the coming years, further enhancing multimodality and reducing the natural barrier of the Bothnian Gulf.

The Kvarken Ports with connections to the Finnish, Swedish and Norwegian hinterlands enhances resilience and strengthens cross-border transport with the help of the world's most environmentally friendly RoPax ferry in the world, planned within CEF Motorways of the Sea and partly funded by the European Investment Bank.



Governance

The members of the Scandria®Alliance very much appreciate the European Coordinators' efforts to strengthen the governance along the core network corridors. It is highly appreciated that, according to article 52 of the proposal, the European Coordinators will be given the opportunity to enforce corridor fora and consultative fora for horizontal priorities.

The Scandria®Alliance and its members are ready to contribute to any of the fora and relevant corridor working groups if the responsibility of its members is concerned. Examples for this are issues related to the coordinated development and implementation of infrastructure projects in cross-border sections, cross-border passenger rail services as well as urban nodes.



The position paper has been consulted with all Scandria®Alliance members and unanimously adopted in a written procedure.



Eastern Norway County Network



Hamburg | Ministry of Transport and Mobility Transition



Helsinki-Uusimaa Regional Council



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