

Revision of TEN-T Guidelines – Norwegian Position Paper

Main message

- The objectives in the proposed revised guidelines coincide with the national ambitions and objectives set in Norway's National Transport Plan 2022-2033.
- A well-functioning transport network is important for Norway with our open economy
- We would still like to include Oslo-Stockholm route in the ScanMed-corridor.
- We welcome measures for better coordination between national level and corridor work plans, however we underline the responsibility of national states for making plans for national infrastructure and their funding.
- It is important that the guidelines open for exemptions based on differences in traffic volume, topography and cost-benefit analyses.

Assessments and preliminary Norwegian position

TEN-T is important for Norway because a well-developed cross-border transport network gives us better access to our most important trading partners and contributes to sustainable and efficient transport. The goals and measures proposed to reduce greenhouse gas emissions from transport are very important, also for Norway. It will be necessary to consider exemptions from the standard requirements on parts of the Norwegian TEN-T network, partly due to low traffic volumes and demanding topography. Norway has chosen not to be a part of Connecting Europe Facilities (CEF) financial scheme and must therefore fund the measures in the Norwegian TEN-T through the annual budgets.

The proposed Regulation is marked as EEA relevant. The current Regulation is included in the EEA Agreement, Protocol 31. Norway considers this form of association to be well suited also for the revised Regulation.

The main objectives of the proposed Regulation are in accordance with Norway's transport policy objectives. Developing TEN-T is important for Norway due to our open economy and our dependence on efficient connections to and from our most important trading partners. We believe the strong coherence between the TEN-T regulation and other transport related directives contribute to fulfil the many goals set for the European transport systems. Most important is the transition towards green and smart transport solutions, which is in line with the targets set in National transport plan for the period 2022-2033.

The Ministry will initiate a dialogue with the Commission aiming for clarifications and possible adjustments to nodes and routes on the Norwegian TEN-T network. This was raised with DG MOVE at the meeting of the EFTA Transport Working Group on March 10, 2022.

Road

The main parts of the requirements for the road network are in line with the national objectives, such as climate and environmental requirements, safe, seamless, and efficient transport, resilience, and efficiency. Some of the standard requirements for the road network have been enhanced compared to the current Regulation. We find that the new requirements for distance between resting areas on the sections with low traffic volumes will be costly to implement. For 24-hour resting areas, the requirements for standards and certification will be demanding to meet at the entire road network. We are in favor of a flexible approach regarding the distance between resting areas and 24-

hour resting areas in sparsely populated areas and for sections with low traffic volumes. We are pleased to note the possibility to exemptions in the proposal referring to these kinds of grounds. At this stage we have not estimated the exact cost for the road authorities.

Maritime transport

Strengthening the competitiveness of sea transport and transferring goods from road to sea are in line with Norwegian transport policy. The Norwegian TEN-T ports are specified only by the name of the municipality and in one case the name of the area. We are in favor of a more precise delimitation of which areas and port of call are intended to be included in the TEN-T port. The concept of seaport is defined, but this should be operationalized on the maps. The Norwegian Coastal Administration will carry out a new review of the ports on which the criteria in Article 24 no. 4 are used as a basis. The analysis will be useful in the dialogue with the Commission.

Railway

Norway is happy with the strong emphasis on the railway system in the proposal. Improved railways are important in the work to decarbonize transport, but also due to the railway's performance regarding energy efficiency per tons transported. Integration of the Rail Freight Corridors (RFC) into the European Transport Corridors is a good measure, which can also counteract duplication of work. It is very important to maintain the good market dialogue developed in ScanMed RFC in a new structure.

The requirements for better punctuality for freight trains are important and will also contribute to better punctuality for the remaining train traffic. We find the requirements for efficient border crossing for freight trains to be most relevant. Border crossing for trains has been carried out seamless between Norway and Sweden for a number of years. The speed requirements will be challenging to meet on some Norwegian TEN-T routes, partly due to topography. The requirements for freight train speed will be difficult to meet and seems more rigid than the requirement for passenger trains. Norway proposes to implement the same term for speed requirements for passenger trains and freight trains. The term *prevailing* minimum speed opens for a more pragmatic adaptation, such as passing through historical urban centers.

The Oslo - Stockholm route is part of the core network but did not become part of the ScanMed corridor when it was extended from Stockholm and northbound towards the Gulf of Bothnia with an arm to Narvik. The route is an important part of both national and international freight corridors, including the connection Oslo - Narvik via Sweden. This underlines the need to incorporate this route into the ScanMed corridor. With the expansion of ScanMed from Stockholm to Narvik, the route between Oslo - Hallsberg/Örebro becomes a missing link. Norway is still requesting to include the route between the Scandinavian capitals Oslo and Stockholm into the ScanMed corridor. The Ministry will follow up this in dialogue with the Commission.

Urban nodes

The proposal to lower the threshold for urban nodes from 500 000 to 100 000 inhabitants has good intentions. It is important to ensure good mobility and logistics solutions in urban areas to avoid bottlenecks and to reduce environmental concerns coming from transport. Regarding Norwegian urban areas, the state, regional and municipal authorities are working together to achieve good and sustainable urban transport solutions. The zero-growth target for passenger car traffic in urban areas is an important objective which leads to prioritization of public transport and measures to get more

people to cycle and walk. We will at a later stage in the process consider whether Urban nodes should be included in the Norwegian TEN-T.

AFIR

The proposal is linking the establishment of alternative fuel infrastructure to the development of the TEN-T network. We consider this as a very important measure and will enhance the green transition of transport. In this context, we refer to the EFTA Comment of the European Commission's proposed amendments to the Directive on phasing in infrastructure for alternative fuels in the transport sector (AFIR) [EEA EFTA Comment](#). We regard the regulation of freight terminals and 24 hours resting places and facilitating the use of alternative fuels in freight transport as particularly relevant. We are positive to see the development of alternative fuel infrastructure in the context of the development of the TEN-T network, but the development should be adapted to the market's need for various alternative fuels. In line with our views on the requirements for distances for resting areas in sparsely populated areas, we find the requirements for distance between charging stations to be challenging and costly to implement for the entire road network. In sparsely populated areas and along sections with low traffic volumes, a fixed distance of 60 km between charging stations is unsuitable.

Exception provisions

Although we are in favor of a coherent and standardized transport system the guidelines must reflect geographical differences and differences in traffic volume. Norway welcomes the opening for exceptions to the standard requirements in the proposal. There will be a need to consider applying for exceptions for parts of the Norwegian TEN-T network. Sections that run through sparsely populated areas, have little traffic and demanding topographical conditions are given the opportunity to be exempted. It may also be needed to consider similar exemptions for ports and other hubs. There will be Norwegian projects in TEN-T network with negative cost-benefit ratio and are therefore not given priority. We believe that there should be an opportunity to obtain a general exemption for low traffic sections and for projects with negative cost-benefit ratio. We regard the planning methods used in Norway, including the cost-benefit analyses, to be robust and valid and thereby appropriate documentation in applications for exemptions.

On national infrastructure plans vs. work plans in the European transport corridors

The guidelines propose measures for better coordination between national infrastructure plans and the work plans for the European transport corridors. It is indeed important to ensure coherence and coordination on central and cross border transport infrastructure. However, Norway believes that the proposal in a larger degree should have underlined the responsibility of national state for making plans for transport infrastructure based on national goals, with priorities and funding opportunities. The national plans and the corridor work plans must be in line with each other, and we believe this can be achieved through systematic exchange of information and a close dialogue in the strategic planning processes. Enhancing the role of the corridor coordinator will also be beneficial. Norway does not support the Regulation's proposal to present draft national plans to the Commission 12 months before they are to be adopted. We think this should be within the national responsibility for infrastructure planning. In a Norwegian context, it can be added that the white paper on the National transport plan is used by the Government to present transport policy and long-term priorities but is not a binding document. We believe that the work plans drawn up for EU transport corridors are useful tools, but that they should have an informal status