

The European Commission
The European Parliament
The Swedish Government
The Swedish Parliament

Europaforum Norra Sverige's comments on the public consultation on regulation (EU) no. 1315/2013 on Union Guidelines for the Development of the Trans-European Transport Network, TEN-T

Europaforum Norra Sverige (EFNS) is a network for local and regional politicians from the counties of Norrbotten, Västerbotten, Jämtland Härjedalen and Västernorrland. EFNS is a forum and an arena for know-how where the politics of the European Union is analysed and discussed to the extent it pertains to northern Sweden. EFNS monitors European issues in order to influence European legislation, EU strategies and action programmes as well as the EU budget. The purpose of EFNS is to safeguard the interests of northern Sweden, at both the European and the national level concerning issues with a clear European perspective.

THE EFNS POSITION IN BRIEF

- EFNS sees great benefits in the European transport policy, not least the prioritised Core Network Corridors which are a crucial tool for implementing the TEN-T Core Network on schedule.
- EFNS welcomes the proposed extensions of the EU Core Network Corridors, the Scandinavia-Mediterranean and the North Sea-Baltic Sea corridors northwards within the scope of the Connecting Europe Facility (CEF). The extension includes the Bothnian Corridor on both sides of the Gulf of Bothnia.
- EFNS stresses the importance of a review of the TEN-T criteria for ports, in order to better support the ports in the comprehensive network, which remain important nodes in the transport network.
- EFNS underlines the need to enable investments at border crossings in the comprehensive network, including to third countries.
- EFNS finds that the northern sparsely populated areas should have broader criteria for investment grants in airport infrastructure.
- EFNS would like to see an opportunity to make socio-economic estimates for entire routes, including border-crossing routes to third countries.
- EFNS asks for clearer requirements, debriefing and follow-up of the regulation, in order to ensure compliance with the rules in actual practice.
- EFNS emphasizes the importance of enabling investments in transport infrastructure in northern Sweden through the ERDF in the next budget period as well.

Introduction

The European Commission has requested comments within the scope of the public consultation on Union guidelines for the development of the Trans-European Transport Network (TEN-T). EFNS welcomes the opportunity to submit comments on the European Union's future design of transport policy and hereby submit our contribution to the consultation.

Northern Sweden has a long tradition of mining and forestry. Our region produces 90 percent of the EU's iron ore and possesses a wealth of mineral and metal resources. Ore and metal based industries represent SEK 500 billion in production value and constitute a considerable part of the European economy. Our region also accounts for around 53 percent of Sweden's

total woodland acreage and is therefore an important foundation for sustainable industry and energy production. Therefore, forestry is also of great importance to the economy of Sweden as well as that of Europe. Sweden is the world's second largest exporter of paper, pulp and sawn timber, i.e. climate-neutral products that are processed using renewable energy and renewable forestry commodities. Accessibility to European markets for commodities and processed products is therefore of great importance to Sweden's overall competitiveness and to European industry.

The OECD Territorial Reviews study of Northern Sparsely Populated Areas (NSPA)¹ demonstrates the need for essential infrastructure investments in both north-south transport routes to markets in Europe as well as east-west transport routes to markets in Asia, and westward towards the Atlantic and larger international markets. This is also clear from the European Commission's report from the consultation on the Arctic, the "Arctic Stakeholder Forum"².

The EU transport policy and the Trans-European Network, TEN-T, play a decisive role in the development of a cross-border, competitive and resource-efficient transport system. Northern Sweden is currently part of TEN-T's Core Network through the Bothnian Corridor that runs along the Gulf of Bothnia, but is outside of the corridor partnership within TEN-T. EFNS welcomes the proposed extensions of the EU Core Network Corridors, the Scandinavian-Mediterranean and the North Sea-Baltic Sea corridors northwards within the scope of the Connecting Europe Facility (CEF). The extension includes the Bothnian Corridor on both sides of the Gulf of Bothnia. We are confidently looking forward to the opportunity to work with other regions and countries to contribute to the implementation of the European transport policy through involvement in the Corridor Partnership from 2021.

TEN-T Design

European transport policy faces a number of challenges. While the investment needs are considerable, the funds available in the budget are limited and will require strict prioritisation in the future. The TEN-T regulation will need to be optimised in order to deliver the greatest European added value from national and European investments. EFNS believes that the European transport policy primarily provides benefit when it focuses on cross-border infrastructure, removal of barriers and bottlenecks, promotion of innovative transport solutions and multimodal transport chains, as well as contributing to the phasing out of fossil fuels.

Accessibility to European markets for commodities from northern Sweden requires functional road and rail connections as well as sea routes. The Core Network port in Luleå is an important TEN-T node in northern Sweden. Other ports in our region that are part of the comprehensive network, in Umeå, Sundsvall and Gävle, are also important to an effective transport system. The same is true for other strategic ports that are not currently TEN-T classified, but which are of major importance to industry and growth in northern Sweden. Accessibility to ports in third countries is also important. To achieve the climate goals we need to focus on transferring as much goods as possible from road to rail and sea, which have lower emissions per transported unit. Investments in these ports would hasten the transfer of goods to eco-friendly modes of transport, which is in line with the EU climate goals and the ambitious climate goals of the CEF.

The current TEN-T methodology focuses on volumes, which puts the ports at a disadvantage in the comprehensive network. EFNS stresses the importance of a review of the TEN-T criteria for ports, in order to better support the ports in the comprehensive network, which remain important nodes in the transport network. This can be achieved by including criteria for the benefit of regional businesses, the European added value and the climate benefit from transferring goods from road to rail/sea.

¹ [Link to the OECD study](#)

² [Link to the consultation report](#)

Already, many important maritime routes currently go between ports in the comprehensive network, in the Mediterranean as well as the Baltic Sea region. The current legal framework assumes that at least one of the ports in the Motorways of the Sea project is a Core Network port. EFNS advocates for a review of the criteria for the Motorways of the Sea project in order to provide better opportunities for ports in the comprehensive network to collaborate with other comprehensive ports.

The comprehensive network is generally of major importance for the functionality of the Core Network and plays an important role in territorial cohesion. In our own region, EFNS sees a need for infrastructure investments in north-south transport routes to markets in the EU, but also east-west transport routes that connect the Atlantic with the Baltic Sea, by rail as well as through ferry routes. Cross-border partnerships concerning infrastructure planning need to be strengthened to achieve a common understanding about infrastructure priorities, enabling the realisation of strong, cross-border transport systems. To achieve better transport flows in the entire network, we need to enable investments at border crossings in the comprehensive network, including to third countries. Coordination and operational compatibility between Core Networks and the comprehensive network should also be strengthened in order to ensure connections to and from the Core Network with functioning transshipment terminals.

The needs of transport infrastructure in the northern sparsely populated areas are in many respects the same as in the outermost peripheral regions. Regional airports continue to be important to territorial cohesion and for the European Union to be able to benefit from the geographical added value of the regions. Accessibility through air traffic is of major importance to regional growth and quality of life, based on the investments made in world-leading basic industries as well as in a growing tourism industry. For that reason, EFNS believes that the northern sparsely populated areas should have broader criteria for investment grants in airport infrastructure than more densely populated parts of Europe where there is competition between airports and other modes of transport.

Implementing the TEN-T

EFNS sees great benefits in the European transport policy, not least the prioritised Core Network Corridors which are a crucial tool for implementing the TEN-T Core Network on schedule. However, the planning and implementation of the national infrastructure plan in Sweden lacks a clear EU perspective, and coordination with the European transport policy goals is weak. This jeopardises the timely implementation of the TEN-T, a conclusion that has also been reached by the Swedish National Audit Office's report, "Road and rail investments in Sweden – lacking an EU perspective?" (RIR 2017:27)³.

Two important EU goals will not, as of now, be achieved in Sweden by 2030: a line speed of 100 km/h and the requirement to be able to run 740-metre long freight trains on the Core Network. Only a few sections of the Core Network are presently achieving the goal for train length and, according to regulations, it is sufficient to prove that it is theoretically possible. Therefore, EFNS asks for clearer requirements, debriefing and follow-up of the regulation, in order to ensure compliance with the rules in actual practice.

EFNS notes that the member states shall develop the Core Network before 2030 so that it corresponds to the provisions in the regulation, but that exemptions can be granted if measures cannot be justified, for example in sparsely populated areas. EFNS would like to underline that particular considerations should be made for "regions with serious and permanent, natural or demographic disadvantages, such as the northernmost regions with very low population density", according to the Swedish Accession Treaty and article 174 in the Treaty of Lisbon. EFNS therefore opposes the granting of exemptions with that wording, as this will adversely impact the northern parts of Sweden.

³ [Link to the National Audit Office report](#)

Socio-economic estimates

According to the TEN-T regulation, projects of common interest must have undergone a socio-economic cost-benefit analysis when applying for EU funding. In sparsely populated areas with long distances, infrastructure investments rarely generate the economic benefits required to compete with investments on the continent. The methodology used by the Swedish Transport Administration for socio-economic estimates is different from the one recommended by the European Commission, which puts infrastructure projects in northern Sweden at a disadvantage. EFNS stresses the importance of taking a holistic approach in infrastructure planning and planning for entire routes instead of individual stages and sections, as well as placing greater value on the growth that may be generated by the infrastructure investments. EFNS would like to see an opportunity to make socio-economic estimates for entire routes, including border-crossing routes, and to third countries as well. The holistic approach in the analyses, which includes the importance of infrastructure to growth, is crucial for sparsely populated regions to get documentation and outcomes that are fair.

The European Regional Development Fund

In northern Sweden, the European Union has contributed to building infrastructure that creates new conditions for innovation and growth, both through the TEN-T and CEF funding, but also with funds from the European Regional Development Fund (ERDF). This includes development of intermodal terminals, port infrastructure, expansion of infrastructure for alternative fuels and special measures for parts of the rail network, which are very important from a regional perspective. These are measures that sometimes have difficulty competing at a national and European level, or where there is insufficient funding reserved within the scope of the counties' transport plans to achieve real improvements. One example is the Mid-Nordic Corridor, Sweden's largest Regional Fund project, which aims to strengthen the Sundsvall-Östersund-Trondheim route. The Mid-Nordic Corridor is a cross-border corridor to Norway that counts as a third country in the TEN-T. Similarly, there is great potential for development in Västerbotten on the E12 route between Mo i Rana and Umeå, both in terms of the flow of goods and in developing tourism, the development of which can continue receiving support from the ERDF.

Having good compatibility and synergy between the European Union's transport policy and cohesion policy is essential for developing infrastructure in northern Sweden. EFNS therefore emphasizes the importance of enabling investments in transport infrastructure in northern Sweden through the ERDF in the next budget period as well, from 2021.

Adopted by Europaforum Norra Sverige on July 2, 2019

Glenn Nordlund (S) Region Västernorrland, Chair of EFNS

Åsa Ågren Wikström (M) Region Västerbotten

Ann Åström (S) Region Västerbotten

Jonny Lundin (C) Region Västernorrland

Jan Sahlén (S) Kommunförbundet Västernorrland

Nils-Olov Lindfors (C) Region Norrbotten

Britta Flinkfeldt (S) Norrbottens Kommuner

Anders Josefsson (M) Norrbottens Kommuner, Deputy Chair of EFNS

Elise Ryder Wikén (M) Region Jämtland Härjedalen

Thomas Andersson (C) Region Jämtland Härjedalen

Robert Uitto (S) Region Jämtland Härjedalen

Erik Bergqvist (S) Region Västerbotten