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## **BSSSC position paper to Public Consultation on Regulation (EU) No 1315/2013 on Union guidelines for the development of the trans-European transport network**

### **Introduction**

*The Baltic Sea States Subregional Co-operation (BSSSC) is a political network organisation for decentralised authorities (subregions) in the Baltic Sea Region (BSR). The network was founded in Stavanger, Norway, in 1993. Its participants are regional authorities (level directly below the national level authorities) of the 10 Baltic Sea littoral states: Germany, Denmark, Finland, Sweden, Norway, Poland, Latvia, Lithuania, Estonia and Russia. The BSSSC co-operates closely with other key Baltic Sea Region and European organisations and institutions. The BSSSC has renewed its Declaration of Common Interest with the Committee of the Regions in 2012 and opens its network for other BSR organisations on local and regional level to become participants (B7, UBC).*

<https://www.bsssc.com/kopi-av-bsssc>

The BSR is a long-ranged region with different demographic and spatial characteristics – as well as industries. The northern-most part of the region is characterised by harsh climate conditions and long distances to markets and services. The BSR region is rich on natural resources which requires good access to EU markets in terms of functional road, rail and sea links. The region furthermore contains major urban nodes and seaports. Due to its geographical location, the BSR is also functioning as a gateway for transports to Russia and Asia.

### **Responses to selected questions under main headlines in the consultation**

#### **A. General questions**

The BSSSC believes that it is very important to have a transport infrastructure policy at EU level in order to enable sustainable development and promote competitiveness and territorial cohesion in the EU & beyond.

The main focus of a transport infrastructure policy at EU level should be to establish physical cross border infrastructures and remove physical and other bottlenecks in the network in order to ensure connectivity and accessibility of all regions and to enable a full decarbonisation of transport.

The greatest need for improvement/development in transport infrastructure policy is to:

- Further improving continuity of the TEN-T network and enabling a better use of existing infrastructure
- Enhancing multimodal connecting points (ports, airports, rail-road terminals, urban nodes)
- Speed up the completion of key projects like the Rail Baltica. The BSSSC calls on the European Commission and involved member states to take steps to streamline procurement and permitting procedures across borders.

## **B. Form of the TEN-T network**

The BSSSC is in favour of continuing the current dual-layer structure, with a comprehensive and a core network. We however believe that connections between the comprehensive and the core network should be improved, and that more funding and higher co-financing rates should be applied for projects on the comprehensive network. The EC is also requested to consider whether it would be feasible to introduce a criterion – whereby no location on the comprehensive network should be more than two hours travelling time away from the nearest connection point at the core network.

The BSSSC believes that the revised TEN-T network should more efficiently facilitate modal shift towards maritime transport. This would entail that ports are considered as cross border infrastructure and that the definition of cross border links includes maritime sections. We also believe that Motorways of the Sea (MoS) must be better integrated in the network, and in order to strengthen the visibility and political support to MoS, the BSSSC invites the European Commission to include MoS in the TEN-T maps. We would furthermore suggest to have the Helsinki-Tallinn maritime link in North Sea-Baltic CNC to be marked as solid line to show the objective to have a fixed cross-border link in the future.

When it comes to the design of the core network, the BSSSC supports the proposal [in the draft CEF regulation] to extend the Scandinavian-Mediterranean Corridor to Northern Sweden and Northern Norway, and the North Sea-Baltic Corridor from Helsinki to Northern Finland across the Gulf of Bothnia to Northern Sweden. The same goes for the proposed extension of ScanMed in Jutland (DK). There is furthermore a need to include the section Stockholm-Hallsberg/Örebro to Oslo in the ScanMed corridor to complete the Nordic Triangle.

## **E. Implementation tools, governance and coherence with other EU policies**

The BSSSC supports a continuation of the core network corridors (CNCs) as an instrument to facilitate coordinated implementation of the core network. We do however call for a more inclusive governance of the CNCs - also allowing for a more systematic involvement in corridor forums of regions, ports and transport hubs not located directly on the corridors.

We perceive the European coordinators as useful to facilitate and accelerate the implementation of the TEN-T core network, and would recommend to continue this function in the future.

The BSSSC believes that there is a fair coherence between the TEN-T policy and other EU policies, but finds that there is still room for improving the coherence with policies related to cohesion, environment & climate and sustainable urban mobility – as well as taking better account of upcoming transport policies objectives/trends (alternative fuels, new mobility

patterns, sustainable urban mobility, automation etc.). It is thus important to facilitate for a large-scale roll out of low-emission vehicles & technologies, with cross border harmonisation of technological specifications and density of charging systems and filling stations for alternative fuels. There is also a need to better link long distance transports to urban transport systems, and to facilitate for first/last mile connections. Besides, the future TEN-T network should be able to accommodate automated/autonomous transport solutions. Due to its geographical location, it is furthermore crucial for the BSR that the TEN-T network has a good connection to third countries like Russia, Ukraine and Belarus in order to develop efficient transport solutions to the far East.

Finally, with the current pace of implementation, we are not convinced that the core and comprehensive network will be completed by 2030 and 2050 respectively.