

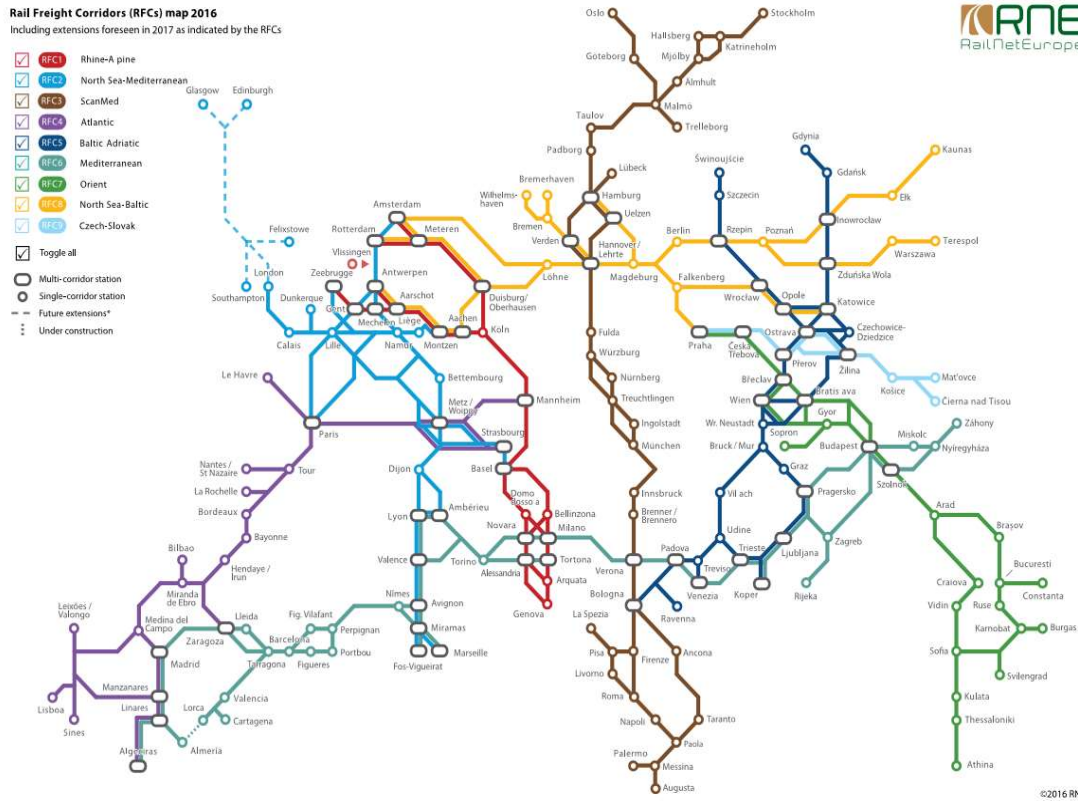
# RAIL DELIVERY GROUP

## Rail Freight Corridors Consultation Submission

### Laura Wright, Head of European Policy RDG

## 1. Introduction

European Rail Freight Corridors (RFCs) were established under Regulation 913/2010 concerning a European Rail Network for Competitive Freight. The Regulation sought to strengthen cooperation between Infrastructure Managers (IMs) on key operational aspects such as path allocation, interoperability and infrastructure development. The UK is on RFC2, North Sea-Mediterranean. The original plan was for this corridor to stop in Wembley (London) but has since been extended, despite legal challenge from the UK, along the West Coast Main Line (WCML).



The European Commission are currently undertaking a review of the Regulation with the evaluation being the basis to determine whether further (legislative) action is needed to improve the policy framework. RDG's proposed response to the consultation is annexed to this paper.

Members of the freight group are asked to review the consultation and in line with the timeline highlighted in Section 3, agree the response. Members are also requested to support the completion of the questions highlighted in yellow with their opinions.

## 2. About RFCs

A RFC is constituted of railway lines, linking two or more terminals along a predefined principal route and for each of the RFCs, a dedicated governance structure is set up, consisting of:

- an Executive Board composed of Member State representatives, and responsible for defining the general objectives and framework of the RFC and supervising its functioning.
- a Management Board composed of rail IMs and Allocation Bodies, in charge of implementing the corridor, i.e. through providing coordinated rail capacity, setting up a Corridor-One Stop Shop (C-OSS) as single contact point for requesting this rail capacity, elaborating an investment plan, through the coordination of infrastructure works and of traffic management.
- two Advisory Groups, one for Railway undertakings (RAGs) and one for Terminal managers (TAGs), which may issue opinions and representing the interests of these two categories of stakeholders within the RFC.

## 3. Responding to consultations post-referendum

Further to our paper to RDG Board (August 2016), RDG will continue to play a full and active role responding to EU consultations which influence and shape EU legislation as long as the UK is a member of the EU. This is important as some scenarios for the UK's future relationship with the EU will involve a requirement to implement EU law. For more information on the impact of the outcome of the EU referendum on RDG's relationship with European institutions and its activities please contact Laura Wright.

## 4. Next steps

- 22 July: Member inputs received by RDG
- 27 July: Suggested response circulated and issue raised at EU Sub Group to CRRWG
- 16 August: Teleconference of respondents if required
- 17 August: Paper to RDG Freight Group
- **19 August: Draft approved by members**
- 29 August: Submission deadline

## **Annex 1**

### **European Rail Freight Corridor – Rail Delivery Group proposed response**

#### **1(a) Which long term role should the railway system play for the transport of goods?**

Rail should play a central role in the transport of goods. The rail freight sector is vital to the competitiveness of the UK; every year the five major rail freight operators transport goods worth over £30 billion. It should continue to play this role and also to seek to increase its modal share not only to delivery this financial benefit but also deliver environmental improvements. Each tonne transferred by rail rather than road cuts CO2 emissions by 76% in the UK. Rail's market share of the UK's domestic land transport freight market has risen between 1998 and 2014 from 11.2% to 16.2%; its overall share of freight moved has risen from 7.7% to 12%.

#### **1(b) In your opinion, should the rail freight transport absorb a part of the freight road transport?**

Yes, rail freight should absorb a large part of road freight transport

#### **2(a)(i) Do you consider the Rail Freight Corridor approach to be relevant in order to boost the competitiveness of rail freight and to achieve modal shift?**

The corridor concept is important and developing cross-border traffic is essential to increasing competitiveness of rail freight and achieving modal shift. The corridor approach will not achieve significant modal shift in isolation and it must be complemented with the right environment to make rail more attractive.

#### **2(a)(ii) If relevant, in your opinion should the Rail Freight Corridor concept be improved/further developed?**

No

Participants in rail freight corridors (RFCs) should constantly be seeking to improve the implementation and operation of their relevant corridor. However, the basic legislative concept does not need to be changed.

In particular, corridors should continue to seek improvement in the cooperation among national bodies in order to deliver high-performance international rail freight services. However, given that some corridors are still in their relative infancy it should not be assumed that this is delivered through legislative measures. It is too early to tell whether the current regulations are effective and therefore it is too early to be recommending fundamental change; proper implementation and enforcement of these regulations should be the precursor to any legislative measures.

However, RDG freight operating members have identified some areas for improvement of the corridors. Currently operators are limited to the annual timetable and the rigid shape of pre-arranged paths (PAPs). Freight members have identified that they need better access to the corridors at much shorter timescales to facilitate ad-hoc traffic. As such, there is a requirement for the C-OSS to be flexible and accommodate ad-hoc capacity requests. RDG's freight members have also

identified a need to be able to access capacity on a corridor over a longer time horizon than a year – in Britain this is done through longer-term framework agreements. Certainty of longer-term access is necessary particularly for start-up operators to make investments and for traffic that is more predictable – particularly intermodal flows. Finally, freight members think that the coordination of engineering work across the corridors could be better organised in order to reduce disruption to operators using the corridors.

**2(b) In your opinion, what is the contribution of the Rail Freight Corridors to cross-border rail freight today?**

Not significant

**Please comment**

There are currently low levels of traffic along the through the Channel Tunnel along the north-western section of the North Sea – Mediterranean Corridor (RFC2) and it is far from reaching its potential. Many of the barriers to this are not ones which can be solved through corridor management. For example, in the UK network gauge restrictions and security issues in particular surrounding the Calais migrant crisis are significant barriers. This is not to say that there have not been positive outcomes experienced in other Member States and where there are fewer physical barriers they provide a platform for cooperation beyond national lines and interests.

**2(c) In your opinion, what could be the contribution of the Rail Freight Corridors to cross-border rail freight in the future?**

Slightly significant

**Please comment**

Rail freight corridors are a good basis on which to build a competitive and attractive rail freight sector helping to overcome operational barriers such as national rules and procedures. Over time, the corridor could provide a framework under which greater alignment of investment, and in developing interoperability could improve the capability of the corridor and deliver efficiency gains for users. However, as outlined above the benefits of removing these barriers can only be realised if the more significant physical barriers are removed.

**3(a) Do you see any other main challenges faced by European cross-border rail freight?**

The challenges for European cross-border rail freight transport could be categorised as follows: a quality challenge (punctuality, reliability), a cost challenge (cost competitiveness), a service challenge (need for the introduction of new and innovative freight transport services), a political challenge (political and societal acceptance) and a European challenge (seamless crossing of borders).

- Non inter-availability of wagons due to both physical network constraints and approval regimes for non TSI derogated wagons;
- Restrictions on locomotives in the Channel Tunnel;

- UK network gauge restrictions both for height and width as compared to continental railways;
- Path availability and restrictions in developing services via High Speed 1 (HS1) the high speed line connecting the Channel Tunnel and London;
- Security requirements, and costs, at Channel Tunnel terminals;
- UK trade balance with continental Europe, which makes it difficult to triangulate loads;
- Service quality in some parts of continental Europe which has been variable.

**3(b) In your opinion, has the Rail Freight Corridor concept the potential to address these challenges?**

Quality – Well addressed

Cost – Hardly addressed

Service – Well addressed

Political – Well addressed

European – Well addressed

**Please comment (in particular, if you listed other challenges in a), has the Rail Freight Corridor concept the potential to address these?)**

Whilst the corridors are an excellent basis to bring together national actors on a supranational basis they do not have the capability to remove all of the barriers to addressing these issues.

**4(a)(i) How appropriate do you consider that the architecture of the governance structure of the Rail Freight Corridors is?**

Appropriate

**4(a)(ii) In practice, how responsive is the current governance structure acting, e.g. to identify and tackle issues hampering cross-border rail freight in Europe?**

Responsive

**Please comment and specify**

The current governance structure strikes a good balance between the complex mechanisms of roles and powers held by the diverse bodies involved in the governance structure. The governance structure must be a real platform for effective dialogue and decision-making, bringing service providers closer to the needs of their customers (both railway undertakings (RUs) and end users).

**4(a)(iii) The Rail Freight Corridor Regulation foresees unanimity for the decisions of both the Executive Board and Management Board. Do you consider this unanimity principle appropriate to ensure an effective management of the Rail Freight Corridors?**

Very appropriate

**4(b)(i) In your opinion, how effective are the Member States in promoting the implementation of the Rail Freight Corridors?**

Effective

**4(b)(ii) In your opinion, how effective do you deem the Management board in performing its tasks?**

Effective

**Please comment**

The Management Board has key decision-making powers within the governance architecture of every RFC. It is therefore fundamental that the role and responsibilities of the Management Board are carefully safeguarded.

**4(b)(iii) In your opinion, how effective are the Advisory groups for railway undertakings and terminals in identifying issues important for the users of the Rail Freight Corridors?**

Effective

**Please comment**

Railway Undertaking Advisory Groups (RAGs) have been effective in identifying issues relevant for the users of the RFCs. Terminal Advisory Groups (TAGs) have been less involved so far.

**4(b)(iv) Please list, if any, some positive achievements and negative impacts of the work of the governance structure?**

There has been good coordination between Member States and infrastructure managers (IMs). The governance structure has helped to achieve harmonisation of some of the corridor's processes. The principle of unanimous decision making ensures all IMs are fully engaged in the corridor management and that the corridor is developed in a sympathetic way to national and European Union (EU) requirements.

**4(b)(v) In your opinion, do you think that it would be beneficial for the development of a Rail Freight Corridor if an independent European coordinator (not necessarily the corresponding Core Network Corridor coordinator), with political influence and negotiation experience, would chair its Executive Board, in order to push the corridor forward, for example by identifying the right issues to tackle and negotiating with the relevant Member States and Infrastructure Managers to pursue the corresponding actions needed?**

An additional layer of governance – in the form of a European Coordinator – bears more potential risks than benefits, notably when it comes to the actual effectiveness of such measure.

Furthermore, the involvement of the EU Institutions in the decision-making process is already assured by the possible participation of the European Commission at Executive Boards' meetings.

**4(c)(i) Do you consider that sector stakeholders are appropriately involved in the governance structure?**

Yes

The concept of 'sector stakeholders' is unclear and would need to be clarified. End users are not currently involved at all in the governance structure. Moving the end users into the formal Management Board could change the nature of the Board and, for example, its ability to share commercially sensitive information. Therefore, the role of end users is not to provide input on operational issues, but to feed in their needs and expectations from the corridors, helping to steer performance of the corridors.

**4(c)(ii) Currently the Regulation does not foresee a formal representation of the Advisory Groups within the Executive Boards or Management Boards (but does not forbid it). In practice some Executive Boards invite the spokesperson of the advisory groups to report, but this practice is not generally used. In your opinion, should representative(s) of the advisory groups attend the board meetings?**

No, it is not necessary

**4(c)(iii) Currently the Regulation does not explicitly foresee the possibility for applicants that are not railway undertakings (non RU-applicants or "authorised applicants" according to Regulation (EU) 913/2010) to be members of the Advisory groups (but does not forbid it). Should the advisory groups be extended to non RU-applicants?**

Yes

**4(c)(iv) Should the terminal managers and port authorities have an enhanced role in the governance structure?**

No

**Please comment**

A possible way to enhance the role of the terminal managers in the governance structure could be to invite their representative to the Management Boards' meetings, if issues relevant for the terminals are to be discussed and at discretion of the Management Board itself. A wider participation of the authorised applicants, through their membership to the Advisory Groups, should be welcomed.

**If yes, should they have a role in the Management Board?**

No

**4(d)(i) In your opinion, to what extent has the Rail Freight Corridor concept facilitated the setting-up of such working groups across borders?**

Significantly

**4(d)(ii) In your opinion, to what extent are the working groups contributing to solve issues hampering cross-border rail freight?**

Significantly

**4(e) Do you think that giving a formal role in the Rail Freight Corridors to further public authorities (such as the European Railway Agency and the National Safety Authorities) would bring an added-value?**

No

**If yes, please explain which role?**

It would be helpful for further clarity on the definition of a formal role.

**4(f) Do you think that the Regulation should contain provisions on the division of competences between the Rail Freight Corridors concerned in the case of sections belonging to more than one Rail Freight Corridor?**

No opinion

**Please comment**

Appropriate harmonisation would be a better answer than division of competences between RFCs. A division of competences may also upset the balance within role and powers in the governance structure.

**4(g)(i) In case a stakeholder, e.g. a customer, complains about the functioning/operation of a Rail Freight Corridor, in your opinion to whom should this stakeholder direct its complaint:**

The management board

**Who should handle this complaint?**

In the first instance, complaints should be directed to the Management Board, which can escalate the problem to Executive Board. If concern remains unresolved the complainant should escalate the problem higher to the relevant the regulator.

**Should the Regulation foresee powers of remedial actions in addition to the one already foreseen?**

No

**4(g) (ii) Today the Rail Freight Corridors tend to increase the cooperation among them; this cooperation is not mandatory (but has been set up between the RAGs, between the Management Boards, and between the Executive Boards): in your opinion should this kind of cooperation inter-Rail Freight Corridors be mandatory formalised?**

No

**Please comment**



Increased cooperation between the RFCs is beneficial. Such cooperation between RFCs should be welcomed and encouraged, however it should not be turned into a mandatory rule. The RFCs need the necessary flexibility to shape these cooperation processes between themselves.

**4(h) Do you have any other comment(s) on the governance structure of the Rail Freight Corridors?**

No

**5. Which benefits and/or disadvantages do you see in the involvement of the Rail Freight Corridors in the work of the TEN-T Core Network Corridors and vice-versa? Which form could this involvement take? How do you assess the current cooperation between the governance bodies of the Rail Freight Corridors and the Core Network Corridor fora and/or the corresponding coordinators?**

The Core Network Corridor (CNC) concept is mainly focused on investments, and RFC on operational aspects. These corridors are complementary and can mutually help each other. The Rail Freight Corridors (RFC) should mainly act as relative short term facilitators of international freight rail transport through proper cooperation with all the stakeholders involved in the logistic supply chain. The RFCs may propose to the CNCs specific bottlenecks and measures to promote infrastructure interoperability. CNC should be mainly focused on the coordination of the medium-long term planning of multimodal investments targeted at creating a TEN-T network compliant with the infrastructure requirements specified in Regulation 1315/2013. IMs are committed to support making the cooperation model operational.

**6 a) Do you consider that the geographical routes of the Rail Freight Corridors defined in the annex of the Regulation are relevant to meet the objective of the Rail Freight Corridor Regulation which is to boost the competitiveness of rail freight?**

Partly

**6(b) Do you consider that the specific railway lines and terminals designated to the current Rail Freight Corridors are relevant to meet the objective of the Rail Freight Corridor Regulation which is to boost the competitiveness of rail freight?**

No comment

**Please comment**

UK rail freight corridor extensions were established in the UK without the consent of the Member State. However, whilst there are concerns about how the extension was undertaken, some members of RDG believe that the extension north of London does reflect user requirements.

RDG note the concerns of domestic operators over path reservation and the impact on domestic freight particularly on congested routes. The route between Channel Tunnel and London does benefit from some paths protected as strategic capacity

and as such the impacts here would be less. In the UK we are still addressing how the extension of the corridor along the West Coast Mainline can address path reservation without detriment to domestic freight growth and passenger service demand. Geographical routes should be amended on the basis of market need.

**6(c) Do you consider that the specific railway lines and terminals designated to the current Rail Freight Corridors are sufficient to meet the objective of the Rail Freight Corridor Regulation which is to boost the competitiveness of rail freight?**

New terminals may be added to the RFC. Given that this can be done under the current Regulation there is no need to revise this.

**6(d) In your view, how significant should market needs be when designing the routes (the geographical definition specified in the annex of the Regulation, which does not specify specific railway lines) of the Rail Freight Corridors?**

Significant

**6(e) In your view, how significant should market need be when designating railway lines or terminals to a Rail Freight Corridor?**

Very significant

**6(f) In relation to questions d) and e), which other criteria should be taken into account?**

Market need should be the main basis for designing the routes of the corridors. However, in addition the quality of lines and the technical characteristics should also be taken into account. Furthermore, the market need should be balanced with the passenger service requirement. Extensions or reductions of corridors should not be based entirely according to market demands, but also require the consent of all Member States and IMs concerned should be sought.

**6(g) Do you see a need for procedures to modify the principal routes of the Rail Freight Corridors, e.g .removing route sections or merging of Rail Freight Corridors?**

Yes.

**Please comment**

Such a procedure should avoid having to going through the legislative process of the modification of the annex of the Regulation. The rule could be:

- if the extension/shortening complies with the annex (the nodes are kept), then the approval of the Executive Board should be needed
- if not, it needs the approval of the European Commission.

In either case, the decision of an extension/ shortening must be based on a market study, for which users and IMs of the corridor have been consulted well in advance.

Some lines or routes of corridors are not currently justified by the market and should be deleted from the annex for example the additional sections of the North Sea – Mediterranean corridor. Furthermore, the current Regulation already provides for a procedure through the process of modification of the annex.

**6(h) The initial nine Rail Freight Corridors have been largely aligned with the TEN-T Core Network Corridors in terms of geographical definition, in order for the Rail Freight Corridors to form the rail freight backbone of the Core Network Corridors Which benefits and/or shortcomings do you see in this alignment between the Rail Freight Corridors and the TEN-T Core Network Corridors?**

Benefits:

- Reduction of management structures.
- Simplification of administrative procedures.
- Increased multimodal competitiveness.
- Any investment in the rail freight backbone will have a positive impact on the RFCs.

Shortcomings:

Having two frameworks firstly complicates the process of corridor extensions and/or removals, and secondly requires legally well-defined roles and regular interaction. As per RDG’s response to question 5, Core Network Corridors (CNCs) and RFCs have key differences in nature and scope. Whereas the CNCs stand on a medium/long-term development, the RFCs focus on daily operational issues. Secondly, CNCs have a multimodal scope, whilst RFCs having a clear rail-related scope. Finally, while CNCs target both passenger and freight transport operations, RFCs are tools specifically designed for rail freight.

**7. a) in terms of reliability, punctuality, quality and efficiency of freight train services?**

	Very positive developments	Positive developments	No developments	Negative developments	Very negative developments	No opinion
2010-today	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In the short term	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Over the period 2010-2030	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Please comment**

No comment

**7(b) in terms of traffic management?**

No comment

	Very positive developments	Positive developments	No developments	Negative developments	Very negative developments	No opinion
2010-today	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In the short term	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Over the period 2010-2030	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Please comment**

No comment

**7 (c) in the field of infrastructure development?**

	Very positive developments	Positive developments	No developments	Negative developments	Very negative developments	No opinion
2010-today	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In the short term	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Over the period 2010-2030	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Please comment**

No comment

**7(d) in terms of capacity allocation procedures?**

	Very positive developments	Positive developments	No developments	Negative developments	Very negative developments	No opinion
2010-today	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In the short term	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Over the period 2010-2030	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Please comment**

No comment

**8(a) The Regulation foresees the adoption of common targets for punctuality and/or guidelines for traffic**

**management, and the drawing up of priority rules for the management of different types of traffic, in case of disturbances of train movements. In case of disturbances, have you perceived a positive evolution with regard to punctuality?**

No comment

**In case of disturbances, have you perceived a positive evolution with regard to traffic management?**

No comment

**8(b) The Regulation lays down one concrete priority rule in the event of disturbance: the train path allocated to freight trains which comply with their scheduled time in the working timetable should not be modified, as far as possible. (i) Do you consider this priority rule as appropriate?**

Yes

**8(b) (ii) In practice, have you seen any effect of this rule?**

No comment

**8(c) Do you think that strict punctuality targets and stronger priority rules should be promoted (i) in the Rail Freight Corridors?**

No

**Please comment**

There should be no legal constraint for the IM to apply pre-defined priority rules between different types of services, as situations need to be tackled on a case by case basis to ensure the smoothest traffic possible on the whole network, based on objective quality goals.

**8(c)(ii) for international freight trains on any routes?**

No, this should not be promoted

**Please comment**

There shouldn't be any priority for freight over passenger enshrined in law. RFCs are a great way of experimenting with new ways of better coordinating traffic across borders however, they should not be used as a tool to increase modal share, not create adverse tension between passenger and freight services.

**8(d) Do you think that priority rules should be harmonised among all the Rail Freight Corridors?**

No.

**Please comment**

There should be no legal constraint for the IM to apply pre-defined priority rules between different types of services, as situations need to be tackled on a case by case basis to ensure the smoothest traffic possible on the whole network, based on objective quality goals.

**8(e) In your opinion, under which circumstances, should passenger trains have the priority over freight trains?**

Specific circumstances

**If, 'specific circumstances' please specify:**

There should be no legal constraint for the IM to apply pre-defined priority rules between different types of services, as situations need to be tackled on a case by case basis to ensure the smoothest traffic possible on the whole network, based on objective quality goals.

**8(f) In your opinion, under which circumstances, should freight trains have the priority over passenger trains?**

Specific circumstances

**If, 'specific circumstances' please specify:**

There should be no legal constraint for the IM to apply pre-defined priority rules between different types of services, as situations need to be tackled on a case by case basis to ensure the smoothest traffic possible on the whole network, based on objective quality goals.

**9(a) Have you perceived developments due to the coordination of traffic management foreseen in the Regulation?**

Positive developments

**Please comment**

No comment

**9(b) Do you think that the role of the Rail Freight Corridors regarding coordination of traffic management should be modified?**

It should remain as it is

**Please comment**

The IMs are in charge for traffic management, and the situation should not change. The current Regulation offers margin of manoeuvre in order to improve the role of facilitation of RFCs – with no need to a regulatory revision.

**9(c) How do you perceive the coordination of works (possessions) in the Rail Freight Corridors in practice?**

Not sufficient.

**Please comment**

IMs commit to improving the coordination between each other in order to minimise any potential disturbance for the customers. The coordination of infrastructure works is a task and responsibility which belongs necessarily to IMs and to involve other actors in this process could make the governance architecture more complex. However, operators using the lines should be consulted on a domestic basis as to when works are taking place and how they may be compensated for any negative operational impacts.

**10 (a) Should the Rail Freight Corridors have a role in the implementation of the following infrastructure requirements laid down in Article 39 of Regulation 1315/2013 (to be implemented by 2030 on the Core Network): 740m train length, 22.5t axle load, electrification, 100 km/h speed?**

Yes

**Please comment**

The responsibility of the implementation of the technical requirements of Regulation 1315/2013 lies with member states and the IMs. RFCs have a role to play as facilitators, for example by including the TEN-T technical requirements in the implementation plans of the Management Boards.

**10(b) The deployment of European Railway Traffic Management System (to be implemented by 2030 on the Core Network) presupposes a close coordination between the deployment on the trackside and the on-board. Moreover some Rail Freight Corridors have merged with the so-called European Railway Traffic Management System Corridors. In your opinion, should the Rail Freight Corridors have a particular role to play in the operational deployment of the European Railway Traffic Management System?**

No

**Please comment**

The responsibility of the implementation of ERTMS lies primarily with Member States and the IMs and ERTMS corridors should not be merged with RFCs.

**10(c) In your opinion, should the Rail Freight Corridors have a particular role to play in the deployment of any other infrastructure parameters (e.g. related to loading gauge)?**

No.

**If yes, please specify which ones**

No comment

**10(d) (i) How would you describe the added-value of the Rail Freight Corridors in terms of coordination of investments across borders?**

Somewhat significant

**Please comment**

The RFC has supported capital investment in RNE of IT systems.

**10(d) (ii) Do you think that the role of the Rail Freight Corridors in terms of coordination of investments should be modified?**

It should remain as it is.

**Please comment**

None

**11. Do you think that the Rail Freight Corridors should have access to dedicated financial resources, having the competence to take the decision for small-scale investments along the corridors?**

Small-scale investments made by Member States or via private investors should be industry-led rather than corridor-led with active dialogue between relevant actors. However, if funds were to be made available by the European Commission then the corridor management should have an input as to how this is directed; RDG would support Commission funding to help corridors achieve quick-wins. However, Member States should not be obliged to make dedicated financial resources available for small-scale investments on the RFC.

**12(a) Do you think that the Rail Freight Corridors should play a role in promoting the access to information about and development (capacity and investments) of last-mile infrastructure?**

Yes

**Please comment**

Last-mile infrastructure is very important in order to exploit all the potential synergies with other modes of transport and make sure that rail freight is fully part of the transport logistics chain.

**12(b) In your opinion, should the Rail Freight Corridors have a role in identifying the impacts of some investments along the Rail Freight Corridor infrastructure, on last mile infrastructures, and vice versa?**

Yes

**Please comment**

No comment

**13(a) How do you assess the amount of dedicated capacity (pre-arranged paths and/or reserve capacity) offered by the Rail Freight Corridors?**

No opinion

**Please comment**

RDG has a limited ability to comment as the UK IM only offered one path and it was not taken up.



RDG note the concerns of domestic operators over path reservation and the impact on domestic freight particularly on congested routes. In the UK we are still addressing how the extension of the corridor along the West Coast Mainline can address path reservation without detriment to domestic freight growth and passenger service demand.

**13(b) How do you assess the quality of the capacity offered by the Rail Freight Corridors?**

No comment

**Please comment**

No comment

**13(c) In your opinion, do national framework agreements, which have been concluded for freight or passenger national traffic, have an impact on the amount of capacity dedicated to the Rail Freight Corridor?**

No opinion

**Please comment**

Framework contracts are now regulated by European law and should, in principle, no longer be a limiting factor.

**13(d) If you are a user of the Rail Freight Corridors: if you have the choice between a pre-arranged path in the sense of the Regulation and paths of comparable quality allocated through the national procedures, do you see an added value in choosing a pre-arranged path?**

No comment

**Please comment**

No comment

**13(e) Do you consider the pre-arranged path concept as being in line with market needs?**

Not always

**Please comment**

RDG note the concerns of domestic operators over path reservation and the impact on domestic freight particularly on congested routes. In the UK we are still addressing how the extension of the corridor along the West Coast Mainline can address path reservation without detriment to domestic freight growth and passenger service demand.

**13(f) Do you consider it possible to reduce the timeline for the application to dedicated capacity on the RFCs for prearranged paths?**

No comment

**Do you consider it possible to reduce the timeline for the application to dedicated capacity on the RFCs for reserve capacity?**

Largely

**Please comment**

Coordination of the RFC path allocation process with the national one has to be ensured. Delaying the allocation of international paths must be an answer to the flexibility requirements of RUs, but must in no case lead to a decrease of quality, i.e. that freight RUs only get the residual capacity in case the applicant loses a pre-arranged path conflict. In any event, the planning of works has to be taken into account when designing capacity.

**13(g) In your opinion, should the timeline for the application to reserve capacity be harmonised among all Rail freight corridors?**

Yes

**13(h) Do you see a need for a new concept for freight capacity allocation, e.g. ensuring at an early stage the reservation of capacity (e.g. time windows) of good quality for freight on the Rail Freight Corridors (and defining specific train paths only at a later stage, closer to the actual running of the train)?**

No, the prearranged path concept is meeting the needs.

**Please comment**

RDG note the concerns of domestic operators over path reservation and the impact on domestic freight particularly on congested routes. In the UK we are still addressing how the extension of the corridor along the West Coast Mainline can address path reservation without detriment to domestic freight growth and passenger service demand.

**14(a) In your opinion, does the concept of C-OSS bring an added value to European cross-border rail freight?**

High added-value

**14(b) If you are a user of the Rail Freight Corridors: what is your experience in terms of contacts and use (including tools and procedures) of the C-OSS**

The concept of the C-OSS of particular value for those international flows that require a number of border crossings and that would otherwise require the customer to negotiate access with several infrastructure managers. However, it may be that where freight traffic crosses only one border, the parties involved already have adequate mutual agreements in place and therefore see no need to place capacity requests through the C-OSS, particularly if this is likely to mean that in the event of conflicting demands, the shorter flows will be given the lower priority.

**Please comment**

No comment

**14(c) In your opinion, should the C-OSS offer include the possibility for users to request: It does not necessarily mean that the C-OSS takes the corresponding allocation decision. Currently the Regulation does not explicitly specify that the C-OSS should offer to users this possibility (but does not forbid it). (i) late request for prearranged path?**

Yes.

**Please comment**

The possibility already exists.

**14(c)(ii) The modification and cancellation of paths?**

No opinion

**Please comment**

Already today the Corridor One Stop Shop (C-OSS) handles changes and withdrawals of paths until the final allocation. In the medium to long term, the role of the C-OSS should be broadened to include modifications and cancellations of paths after the allocation. It should also deal with other pre or after sales activities.

**14(c) (iii) National capacity**

No

**Please comment**

No comment

**14(c) (iv) Terminal capacity?**

No

**Please comment**

Terminal capacity should be provided using the existing measures in the first Package Recast on a non-discriminatory basis directly with the terminal facility owner.

**14(c) (v) Information about last-mile infrastructure**

Yes

**Please comment**

No additional comments.

**14(c) (vi) Feeder and outflow paths?**

No comment

**Please comment**

No comment

**14(c) (vii) Other?**

No

**Please comment**

No additional comments.

**14(d) In your opinion, what should the reserve capacity consist in?**

No comment

**Please comment**

No comment

**14 (e) In your opinion should the C-OSS handle ad hoc requests for capacity other than reserve capacity?**

No comment

**Please comment**

No comment

**14(f) The current framework for capacity allocation foresees that the reserve capacity shall be requested to the C-OSS at least 30 days before the running day. In your opinion should this period be shortened for ad hoc requests (reserve capacity or other) to be requested closer to the running day of the train?**

Yes

**If yes, until how many days? Please comment**

The C-OSS should be able to deal with ad-hoc requests in a shorter time-frame.

**14(g) Do you think that the C-OSS should deal with broader administrative processes like for example charging and billing?**

No opinion

**Please comment**

Including charging and billing in the C-OSS might indeed be useful in the long run, but it is not urgently needed at this point. Setting it up will require significant resources and harmonisation of the cost structures.

**14(h) Do you consider that it should be possible to request via the C-OSS additional services like services at the stations, (e.g. parking or draining services, etc.)? (the current Regulation does not explicitly foresee it, but does not forbid it)**

No

**Please comment**

The existing measures in the first Package Recast should be used with access to facilities being offered on a non-discriminatory basis directly with the facility owner.

**14(i) In your opinion, would there be an added value if? (i) the C-OSSs of the different Rail Freight Corridors cooperate more closely and jointly set up a single internet-based interface displaying the capacity for the entire network of Rail Freight Corridors and providing information concerning the use of the Rail Freight Corridors?**

No

**Please comment**

Such a tool already exists. The RNE Path Coordination System (PCS) is an internet based application which optimises international path coordination by ensuring that path requests and offers are harmonised by all involved parties. Input for international path requests needs to be placed only once into one system - either into the domestic application or directly into PCS. However, there is still room for improvement (a more customer oriented interface). A single internet based tool could provide information on access conditions to the RFC network and to terminals on infrastructure works, etc.

**(ii) The C-OSSs of all Rail Freight Corridors were merged into a single C-OSS?**

No comment

**Please comment**

No comment

**15. In your opinion, would it be beneficial to have targets to monitor the effectiveness of the Rail Freight Corridors as a tool to boost European rail freight? For instance, in terms of traffic volumes or in terms of quality (e.g. punctuality and reliability) or in terms of infrastructure quality?**

	Very beneficial	Beneficial	Disadvantageous	Very disadvantageous	No opinion
Traffic volumes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Quality of the services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Infrastructure quality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Have you any idea of other type of targets, the setting up of which would be beneficial to the Rail Freight Corridors?**

No comment

**If you deem that the setting of such targets would be beneficial, how could they be defined, and by whom (e.g. by the Regulation, jointly by the governance bodies)?**

No comment

**16. In your opinion, should the Regulation guarantee to terminals or other stakeholders the access to real-time train data concerning international freight trains, for example Estimated Time of Arrival (ETA)?**

Yes

**Please comment**

No comments

**17(a) In your opinion, is the legal framework clear enough for the regulatory bodies to adequately perform their supervision of the Rail Freight Corridors?**

Yes

**If no, please specify in which field?**

n/a

**17(b) Would you have any suggestion on how to improve the regulatory supervision?**

No comment

**18. Would you see an added value in having a single operational language:**

**a) on the cross-border sections until the first station/terminal on each side of the border?**

For the rail sector, the issue of operational languages is very important, and does not only apply to rail freight traffic on cross-border sections. This issue is therefore not specifically linked to Regulation 913/2010, and should be dealt with in the Operation and Traffic Management (OPE) TSI.

The question of language on cross-border sections is currently being addressed through the amendment of the Train Driver Licensing Directive to ensure that legislation does not impose a disproportionate burden on the industry.

**(b) along the entire network of Rail Freight Corridors?**

No

**If Yes, please specify for which staff category**

n/a

**19. Do you see an added value in using the Rail Freight Corridors as a pilot vehicle for the deployment of innovative digital solutions and logistical applications?**

Yes

**If Yes, please specify for which one and/or in which field**

The deployment of innovative digital solutions on the corridors could be used as pilots for certain tools focusing on improving service quality.

**20. (a) The European Commission has received a certain amount of feedback, both from Stakeholders inside the Rail Freight Corridors and from users of the Rail Freight Corridors, according to which the Rail Freight Corridors are suffering from a lack of harmonisation and of user-friendliness (e.g. concerning the Corridor information documents, terms and conditions, Frameworks for capacity allocation, Performance monitoring reports, deadlines, transport market studies, reporting procedures).**

**(i) Do you agree with this view?**

Agree

**Please Comment**

Appropriate harmonisation should focus on: the transport market study; capacity products and the allocation process; the coordination of planned temporary capacity restrictions; the all-encompassing Corridor Information Document (CID), serving as the instructions of use for the RFCs; and a Geographical Information System (GIS). This should lead to a simplification of the day to day operations of clients.

**20(a)(ii) In your opinion, should the Regulation define minimum requirements for the structure and content of documents like the one mentioned above?**

No

**If yes, please specify which ones**

Boards of RFCs are already committed to further harmonisation over time, respecting the principle of unanimity among its members.

**20(b) In your opinion, should the tools, methods and processes developed and approved by RailNetEurope be systematically implemented by the Infrastructure Managers along the Rail Freight Corridors?**

Yes

**Please comment**

The consent of all IMs along the corridor should be sought. The guidelines are, by nature, not mandatory.

**21. Are you aware of any incoherencies or unclear terminology in the Regulation which would need to be better defined?**

No.

**22. In your opinion, are the costs incurred for setting up, managing and making use of the Rail Freight Corridors by the stakeholders like the public authorities, the infrastructure managers, the railway undertakings or the terminal managers proportionate to the benefits of the Rail Freight Corridors for cross-border rail freight?**

No comment

## **Please comment**

No comment

**23(a) Do you think that the objectives of the Regulation are coherent with the broader EU Transport policy, and in particular with the White paper on Transport of 2011, which i.a. sets the objective to reduce CO2 emissions from transport by 60% by 2050 and to shift 30% of long-distance road freight to more energy-efficient transport modes by 2030 and 50% by 2050.**

Yes, to a small extent.

## **Please comment**

Rail freight has a key part to play in meeting EU environmental targets. Growing rail freight's share of the surface freight market will be crucial in meeting these objectives.

In comparison to road which dominates the market, rail offers significant environmental benefits including:

- Reducing CO2 emissions: rail freight reduces CO2 emissions by up to 76 per cent compared to road.
- Reducing air pollution: rail freight produces up to 10 times less small particulate matter than road haulage and as much as 15 times less nitrogen oxide for the equivalent mass hauled.

The success of initiatives such as the RFCs will be required to grow or maintain market share which will be crucial to supporting a greener economy.

However, no level playing field between road and rail exists in many European countries, and operating trains across national borders is - unlike road transport - still a difficult and costly challenge with many challenges in terms of technology, infrastructure charges and safety procedures.

**If yes, do you consider the Rail Freight Corridors, as specified in the current regulation, the right tools to contribute to the modal shift to rail?**

The RFCs will contribute to modal shift to rail, however a number of other barriers to modal shift cannot be removed by the Regulation such as:

- Non inter-availability of wagons due to both physical network constraints and approval regimes for non TSI / TSI derogated wagons;
- Restrictions on locomotives in the Channel Tunnel;
- UK network gauge restrictions both for height and width as compared to continental railways;
- Path availability and restrictions in developing services via HS1;
- Security requirements, and costs, at Channel Tunnel terminals;
- UK trade balance with continental Europe, which makes it difficult to triangulate loads;
- Service quality in some parts of continental Europe which has been variable.



**23(b) Do you think that the objectives of the Regulation are coherent with the ten priorities set by the Juncker Commission?**

TBC

**If no, please explain why**

The objectives of Regulation 913/2010 are not in line with the ten Juncker Commission priorities. The Juncker Commission reorganised the Commission activities to focus on ten priorities, with the aim of stimulating investments for the purpose of economic growth and jobs creation. Investing in the rail sector is unfortunately not a priority of the Juncker Commission. On the contrary, we saw parts of the EU budget, which had been allocated for grants in the transport sector through CEF, being shifted away to EFSI.

**(c) Do you think that the Regulation coherently fits in the current railway legislation (notably Directive 2012/34/EU establishing a single European railway area ('Recast')) and infrastructure development and financing legislation (notably the TEN-T Guidelines and the CEF Regulation)?**

No opinion

**24. In your view, has the implementation of the Rail Freight Corridors had impacts that you did not initially expect?**

No comment

**Please comment**

No comment

**25. In your opinion are there additional issues which are not yet covered by the Regulation (e.g. as regards interoperability, technical and operational barriers or noise mitigation), the tackling of which the Rail Freight Corridors could play a role in?**

No

**26. Which operational and technical barriers should particularly be tackled in order to boost traffic on the Rail Freight Corridors, and more generally rail freight in Europe?**

See response to 23(b)

**27(a) In your opinion, which topics should particularly be tackled by research and innovation in order to boost the traffic on the Rail Freight Corridors, and more generally rail freight in Europe?**

- Longer trains (740m+)
- Automatic driving
- Electronic consignment notes
- Intelligent assets (wagons)

**27(b) Do you see any specific innovation the rolling out of which would particularly benefit the Rail Freight Corridors and more generally rail freight in Europe?**

No comment

**28. Have you any other suggestion for the development of the Rail Freight Corridors?**

There is a need to ensure a level playing field between all modes, including competitive track access charges, as prices are of key importance in a competitive environment.

RFCs will benefit from telematics Applications for Freight (TAF) TSI and could therefore review with participating IMs how implementation should be synchronised along corridor routings.

- Several TAF functions are useful only if all partners on the RFC have implemented it (e.g. expected time of arrival).
- The target dates for implementation are different for each company according to the individual Company Masterplans. Harmonisation of these dates would make sense and would be easier to coordinate in existing organisations like the RFC.
- RFC regularly complain about data quality. TAF aims at better data quality – if all partners implement TAF.
- In general, TAF is aiming at improving data exchange for freight transport. Freight transport is the key issue for the RFC.