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Contact
Bescherming persoonlijke levenssfeer

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Subject European Commission consultation on high speed rail initiative

Enclosure(s)
1

Dear Mr Bescherming

Thank you for organizing a public consultation on the European Commission initiative on high speed railways. The initiative is important as an opportunity to work collectively on improving not only high speed rail infrastructure in the European Union but above all develop the high speed train services network.

In this context we look forward to the Commission's proposal for the new Multiannual Financial Framework (MFF) and the prospects of a new Connecting Europe Facility as a separate fund, outside of the competitiveness fund and the single national plans.

Attached in the annex you can find our contribution to the consultation on high speed railways. We look forward to cooperate further with you on this file.

Yours sincerely

Bescherming persoonlijke levenssfeer

Director Public Transport and Railways

DG Mobiliteit
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Date
19 May 2025

Annex

European high speed masterplan

Disclaimer: this note does not bind in any way the formal NL position on the future EU decision making on the file. The note cannot be made public.

1. Introduction

The European Masterplan on high speed is welcome, in particular concerning cross border high speed. The European Union has concentrated its efforts on high speed in the past 30 years mostly on funding dedicated high speed infrastructure with France, Spain and Italy as mayor examples. The Paris-Brussels – Koln – Amsterdam – Londen (PBKAL) high speed network is almost an exception in its cross border character.
Growth and further technical integration of the cross-border rail infrastructure is only one part of increasing international connectivity. International connectivity is a key driver for economic development. This work can only be redeemed when the tracks are utilised fully. For passengers quality and attractiveness of high speed depends on:

- Train speed;
- Frequencies and connections of train services;
- Price levels;
- Passenger experience (ticketing, comfort, information etc)

Modal share for rail is on average considerably lower at cross border level compared to domestic services (approximately 5 versus 9%), and in peak hours modal share of rail can reach up to 50% for some origin destinations). The fact that modal share for domestic rail and domestic high speed rail is considerably higher than the modal share for cross border (high speed) rail is a reason for European action.
In particular services frequency (and the related transport capacity!) is in many reports underestimated as a decisive factor for passengers. It has a direct relation with travel time as well as the perceived reliability of the service.
The EU efforts on a network of cross border high speed rail should not only focus on infrastructure development but, equally important, also on service levels to passengers. Moving from a Infrastructure approach to a service supply approach. What is the high speed network of services that the EU wants to achieve by 2040?
High speed rail transport development can bring several benefits:

- Economic development of mayor cities and connected regions;
- Making transport more sustainable;
- Serving business travel, tourism, connecting to family and friends, and also commuters / students travel;

In annex a few answers to the questions raised.

2. Building blocks EU masterplan

Important initiatives at European and sector level are relevant to build upon future strategy on high speed:

- The 2016 4th railway package with rules on market access (open access and PSO), railway safety and interoperability;

- The 2020 ministerial declaration on international railway passenger transport, asking for a committed European agenda on cross border rail passenger transport and establishing a platform of Member States (IRP) working together with sector and EU institutions ;
- The 2021 EU sustainable transport strategy with objectives on doubling high speed rail by 2030 and tripling by 2050;
- The December 2021 European action plan on cross border passenger services,;
- The 2022 EC initiative on 10 pilot projects to improve international rail passenger transport. First findings show i.a. that lack of or limited coordination of rail capacity is a key item in delivering more cross border passenger trains;
- The 2023 Commission proposal for a regulation on capacity allocation, with provisions on international coordination of capacity by Member States" strategic guidance and by Infrastructure managers strategic planning;
- The 2024 4th progress report (IRP) of international rail passenger services platform submitted to EU transport ministers. Showing the existing level of cross border passenger services. With an expected update for 5 June 2025;
- The ongoing sector initiative on Eurolink, showing a model(s) for cross border rail passenger services levels at European level;
- The 2024 regulation on TEN T showing an extended core network of rail passenger services for 160kmph for 2040;
- The 2025 ongoing RNE transport market study at European level;

Therefore the European Commission masterplan high speed should take fully account of these governmental and sector initiatives.

3. Possible EU avenues to accelerate development of European high speed

At European level the high speed rail infrastructure has developed greatly in the past 30 years, and can be further developed by addressing missing links or bottlenecks. Development of service levels and competition between rail services is mixed and is relatively lagging behind this infrastructure development. In particular for cross border services the services levels can be increased.
There are many reasons why it is more difficult to accelerate cross border service development:

- Capacity allocation priorities and strategies are coordinated in a limited way cross border;
- Interoperability issues. E.g. different electrification and signalling / ERTMS systems make cross border high speed rolling stock considerably more expensive. E.g. Amsterdam – Frankfurt - Vienna;
- Infrastructure bottlenecks to increase services levels. E.g. (Schengen / security border) terminal development in Amsterdam Zuid is decisive for additional services to London;
- The European and national regulatory framework conditions regarding i.a. open access conditions and public service contracts.

What the European Union (Member States) can do to improve high speed rail services:

- Consider to transform the EU Green Deal/ European Sustainable Mobility Strategy of doubling high speed by 2030 and tripling by 2050 into an target / ambition service level for 2040 / 2050 per corridor or origin - destination ("defining an Europatakt"?) Both journey time and frequencies should be taken into account. What do we want to achieve? The RNE transport market study and the Eurolink research are key elements to develop such targets / ambition. Member states and Infrastructure Managers involvement is a pre-condition. At national level many Member States have such strategies already (NL Programma Hoogfrequent Spoorvervoer, DE Deutschlandtakt, horizontal timetables);
- Part of the target / ambition 2040 level may also comprise a vision on main railway hubs (stations) to be served with sufficient rail capacity. Those hubs are critical for national and international intermodal connections and are a driver for economic growth at regional level. At UN ECE SC.2 level a framework is defining on international rail passenger hubs as part of the UN ECE AGC agreement;
- Annual monitoring of market development (follow up IRP monitor 2024 and 2025) with concise analysis of bottlenecks. This annual monitor, that can be further established in cooperation with EC, should describe the progress on meeting the ambition targets of 2040;
- Define a governance structure of MS and IM cooperation to develop an implementation plan showing all the measures needed to achieve the target /ambition level of train services (i.a. capacity coordination, interoperability, bottlenecks, border control, market regulation and possibly passenger experience issues). The 2024/1679 art 67 (4) under article 3.2 TEN T corridor regulation is relevant with its provision on including international rail passenger transport and relevant is the rail capacity regulation that is currently in the triologue decision making phase. The rail freight corridors model is also relevant here with ministries and infrastructure managers coordinating capacity management, within its own role. A consultation / cooperation model with railway undertakings is critical to achieve the objectives. A governance structure shall take account of the TEN T European transport corridors that are focussed on infrastructure development;
- EC supporting measures on a new phase in pilot projects for cross border rail services. The pilot projects should be supported at EU level with sufficient resources (financial / human). One of the issues to be resolved shall be coordination of capacities in practice.
- Horizontal measures for follow-up include: railway and intermodal ticketing, rolling stock interoperability and financing, passenger rights;

Appendix
Questions for discussion
Following the exchange at the last SERAF Plenary meeting in November and building on the input received on that occasion, participants are invited to discuss the following questions:
1) What are the main barriers to the timely implementation of the passenger rail network agreed in the TEN-T regulation? Which actions should be taken to coordinate the planning, financing, and implementation of interoperable cross-border infrastructure? This question could cover, but is not limited to elements such as:
• Implementation delays of national and cross-border HSR infrastructure projects and slow establishment of new services
• Lack of national investment in cross-border rail and high HSR construction costs
• Climate resilience and environmental impacts of new high speed rail infrastructure

RESPONSE:
Implementation of TEN T regulation is important, for international rail passenger (high speed), also important is capacity allocation and frequency of services.
We are preparing the implementation of the TEN T regulation 2024. Upgrading of line speed to 160kmph results in major costs for the extended TEN T core network in the Netherlands.
Possible bottlenecks need to be analysed at corridor level from origin to destination. E.g. to increase service levels from Amsterdam to London extension of terminal capacity in Amsterdam may be needed combined with extension of rail capacity between Antwerpen and Brussels (analysis ongoing). Both physical infrastructure and capacity allocation are very relevant.
In collaboration with our infrastructure partners (ProRail and Rijkswaterstaat) we have defined a strategy and budget allocated to reach 'Climate neutral and circular infrastructure' (build new and maintenance), timing and ambitions aligned with the EU Green Deal. As the rail infrastructure market is a European market international collaboration on innovation, research and procurement is needed.

2) What are the main barriers hindering the development of cross-border passenger services? Which actions should be taken to facilitate a profitable business model for all operators, ensuring full competitiveness on the high-speed railway network, and enabling a service model centred around the needs of citizens? This question could cover, but is not limited to elements such as:
• Financing of rolling stock
• Capacity Allocation
• Track Access Charges
• Access to service facilities and access to services
• Booking and selling rail tickets
• Strengthening multimodality through better rail connections to airports
• Affordability of rail services

RESPONSE:

Capacity allocation is key, certainly in dense rail networks like in the Netherlands. Therefore a common ambition for service level 2040 at European level is critical. With such common ambition MS can be supported to coordinate their regulatory frameworks (strategic guidances). Capacity allocation is also strongly related to the financing of rolling stock, as financing partners cannot invest without a business case. To increase train travel by 2 or 3 times it is expected that the availability of rolling stock will become an issue. An assessment of the EU rail rolling stock manufacturing industry capacity can be valuable to better understand what measures can be taken to boost this market. This is also related to the 3rd question.

3) Which actions should be taken to ensure that the development of the European high-speed network contributes to strengthening the competitiveness of the European rail supply industry? This question could cover, but is not limited to elements such as:
• Enhancing interoperability of railway infrastructure and rolling stock across the EU
• Promoting a competitive European rail supply industry by reducing divergences in requirements and achieving economies of scale
• Advancing research and coordination to modernize infrastructure and sustain competitiveness
• Co-developing core high speed rolling stock technologies for the next generation of high-speed trains

Response:
All items mentioned are important. Also here action must be started bottom-up. What is most cost beneficial and needed on the corridor Amsterdam – Frankfurt – Vienna – Budapest, what are then the steps to be agreed.