



Baltic– Adriatic Rail Freight Corridor 5

Evaluation of the EU Regulation 913/2010: Position Paper



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1. Introduction

The Rail Freight Corridor Baltic-Adriatic (onwards “Baltic-Adriatic RFC”) welcomes the initiative of the European Commission of an evaluation of the EU Regulation 913/2010 (onwards “the Regulation”). After four years (six for other RFCs) of operation, the time has come for all stakeholders to take stock of the results achieved.

All actors involved in the activities of the Baltic-Adriatic RFC and especially the IMs members believe in the potential contribution that the RFCs can give to the objectives set down by the White Paper¹.

Baltic-Adriatic RFC is confident that the results of the assessment will show that all RFCs have correctly implemented the requirements of the Regulation. More than that, they have put in place initiatives, individually and collectively, that, although not provided for in the Regulation as legal requirements, pursue the goals that go beyond the application of the Regulation to the letter, but stem from the spirit of the Regulation.

It is of utmost importance to verify whether the legal and operational tools available to the RFCs are adequate to continue to work in the described way and most of all, to further develop the strategic approach to go beyond the legal requirements.

Baltic-Adriatic RFC looks forward to measures, not necessarily in terms of legislation, which could make the operation of the RFCs smoother and more effective.

2. Approach

The Baltic Baltic-Adriatic RFC has applied a two-folder approach in its contribution to the evaluation of the Regulation:

- On the one hand, it participated in the discussions held in the framework of the RFCs Network, where strengths and achievements of the RFCs as a community have been identified.
- On the other hand, the IMs members of the RFC have identified a number of ideas, which meet the consensus of all IMs involved in the RFC

These ideas are described below and clustered in four focus topics: Governance, Capacity, Operations and Investments

Individual IMs members of the Baltic-Adriatic RFC, might provide their own individual positions.

3. Focus Topics

3.1. Governance

A benefit of the RFCs structure, as provided for in the Regulation, is that it allows bringing together all actors in the logistic chain. Beyond the Regulation provisions, the RFCs have worked more and more in the spirit of a network approach, allowing economies of scale and synergies. The Corridors, both in cooperation and individual RFCs, were able to start a structured cooperation with many stakeholders (other international organisations, for example).

The unanimity rule shall be kept because this allows a stronger commitment by the RFCs members.

Besides these positive aspects, Baltic Baltic-Adriatic RFC identified the following room for improvement:

- Need of a stronger involvement of RAG-TAG:
 - On the one hand, the Advisory groups have allowed the IMs to better understand needs of the Terminals and RUs; however, the idea of a common commitment of IMs, RUs and Terminals towards the market is not yet fully shared and applied. RAG and TAG should be not only the place where IMs

¹ “Roadmap to a Single European Transport Area - Towards a competitive and resource efficient transport system”

answer/present to RUs and Terminals, but a platform where every stakeholder is responsible for the achievement of common goals;

- On the other hand, it is necessary to take into account that RAG members are in competition among them and it is not always easy to gather a common position. In addition, the (understandable) reluctance to share information and data, makes it difficult to achieve the expected results in innovative projects
- Better clarification of role of RFCs and of the scope of action, in order to avoid double/useless activities and to avoid perception of the RFC as "competitor" of the IMs. The Regulation covers many fields of actions. For some, the role of the RFC is clear, and the IMs do not have problems in cooperating. In other cases, the role of the RFC is not so clear: misinterpretations, in this cases, might cause differences in the application of the Regulation among RFCs (where the same IM(s) are involved) and/or double work by RFCs, IMs and/or other entities.
- The network approach must be strengthened. Competition is counterproductive: IMs have limited resources, RUs often make use of more than one RFCs, Terminals might be involved in more RFCs. For all of them, a network approach means more efficiency and transparency. This network approach should further be strengthened in the case of studies

3.2. Capacity

One of the potential added value of the RFCs capacity offer, in the idea of the RFCs and IMs, but also of the RUs is that a unique point of contact for application and allocation, would make it easier (and therefore cheaper and more efficient) for the RUs to obtain international capacity for freight. The cooperation among RFCs and especially C-OSS allowed applying common rules and procedures.

In addition, the initiatives of the RFCs towards the RUs (wish list for example) or the end customers, have started a virtuous process of better understanding of the market.

The above positive aspects have not yet fully produced concrete results and Baltic-Adriatic RFC stresses the following items as attention points:

- supporting IT tools do not seem to be fully compliant with all stakeholders expectations: it is essential to get one common IT tool servicing international (on EU level) rail freight capacity booking and monitoring
- the market orientation shall be the focus of the RFCs
- the role of the C-OSS shall be reinforced in terms coordination and market intelligence; its competences shall be enlarged to the whole process, rather than envisage an enlargement of the offer/ allocation tasks of the C-OSS. In particular:
 - It would be beneficial if all international freight could (not must) be requested via the C-OSS – but only if this is done exclusively in PCS (see above, statement on IT tools)
 - The C-OSS should reinforce common customer oriented approach, with marketing initiatives
 - Individual RFCs should try to design products which are better ("premium products") than standard products (for example, Baltic Baltic-Adriatic RFC's "ExtraLong Train Path²"), based on the acquired market knowledge
 - When the the new international timetable process is implemented according to the [TTR project](#) and operational, the C-OSS' should be involved in the TTR Capacity Model definition

² [Our offer](#)

- The RFCs Reserve Capacity and the TTR Rolling Planning shall be merged
- Regarding the TTR Project, in the new regulation there should not be any stipulations that might be an obstacle to the redesign of the Timetable process

3.3. Operations

As stated in 3.2., the Regulation is sometimes not clear when defining the role of the RFCs in the different fields of actions. This is the case of the operation and TCRs

Baltic-Adriatic RFC envisages a stronger and clearer role of the Corridor in the fields of operation and TCRs, without the introduction of discriminatory elements. This means that the RFCs should enforce a better cooperation in the field of traffic management, in order to eliminate operational barriers, regardless from the fact that the involved trains run on PaPs or on "traditional" international paths. In general, RFCs should improve the attractiveness of the rail transport mode (for example_ improving the reliability, punctuality, cooperation of all the partners in the logistic chain, smoothing the cross-border operations): therefore, the attention of the RFCs should not only focussed on the size of the capacity actually offered and allocated by the RFCs, but, in general, on the possibility to make the rail transport more competitive so the share of rail increases over road, regardless from the entity/entities who offer/s rail capacity.

3.4. Investments

As stated above, the risk of double work should be avoided. It is clear for Baltic-Adriatic RFC that the main role for what concerns investment planning and monitoring should remain in the hand of the current responsible national (Governments, IMs) and international (CNCs) partners.

However, the current description of RFCs responsibilities in this field may lead to misunderstanding and request of activities, which seems to overlap with other partners activities. Therefore, a better clarification of the responsibility of the RFCs in the field of investment planning is needed and should clarify that RFCs should mainly provide its inputs in terms of data and market knowledge, while CNC should be the responsible body of the planning.

4. Conclusions

Baltic-Adriatic RFC's ideas regarding the evaluation of the Regulation can be summarised as follows:

- The basic approach of the RFCs has shown its benefits, at least potentially. Some of them might not have fully provided visible results, but in railways change cannot be expected quickly and small improvements are already detectable, especially considering all the activities that RFCs have set up beyond the Regulation requirements
- The evaluation should lead to highlight the strengths of the Regulation and of the current RFCs activities and to identify measures to further reinforce such items (also in terms of financial resources and not only of legal instruments)
- The evaluation should also stress the hurdles that prevent more effectiveness of the RFCs activities and identify corrective measure to solve these issues

5. Contacts

Baltic-Adriatic RFC's PMO can be contacted anytime for explanations. See reference [here](#).