

CLECAT
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CLECAT circular CI-2006/129

SIFA have the following comments to the strategy proposed by the Commission in the communication on a dedicated rail freight network.

1. General comment

We agree, in general terms, with the problem definitions set out in the communication. The problem of discriminatory charging and cross-subsidation would however in our opinion require further analysis. A review of the charging system would have its place in the context of the review of the general infrastructure charging principles set out for 2008 in the communication on a mid turn review of the White Paper on Transport Policy 2001.

2. Adequacy and geographical coverage of the measures proposed under option B.

We agree, in general terms, with the orientation of the measures proposed under this option. We have the following comments:

- a) Measures B1 – through B10 do not seem to have to be limited to a dedicated network. They seem to be administrative/regulatory measures that could cover the whole rail network. The only exception is measure B3, which would have to be limited to a number of border crossings, with high traffic density.
- b) Measure B11 and B12 would of course have to be limited geographically, as far as the infrastructure is concerned. The network proposed in the paper is, however, in our view much too thin to serve its purpose and leaves too many empty spaces. For example in Scandinavia we would mention the complete absence of rail connections to include Norway and the largest port in Scandinavia in Gothenburg (links Stockholm – Oslo; Stockholm – Gothenburg, Oslo – Gothenburg – Malmö must be included). We also miss the Fehrmaern link between Denmark and Germany and the rail corridor from the Baltic shore (Rostock, Swinocie) north-south through central Europe, both already now important for freight and more so in the future.

Yours sincerely

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