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# Open public consultation on the Evaluation of Regulation (EU) 913/2010 concerning a European rail network for competitive freight

## *(Version for public **not** familiar with the Rail Freight Corridors or with the European railway market or the (rail) freight transport sector)*

Fields marked with \* are mandatory.

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### Part I: Agreement on personal data and identification of the respondents

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#### Agreement on personal data

\*Please indicate your preference for the publication of your response on the Commission's website:

(Please note that regardless the option chosen, your contribution may be subject to a request for access to documents under Regulation 1049/2001 (<http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001R1049>) on public access to European Parliament, Council and Commission documents. In this case the request will be assessed against the conditions set out in the Regulation and in accordance with applicable data protection rules (<http://ec.europa.eu/justice/data-protection/>).

- Under the name given (name of your organization/company/public authority/association or your name if you reply as an individual): I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
- Anonymously: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
- Please keep my contribution confidential. (it will not be published, but will be used internally within the European Commission)

\*May the Commission contact you, in case further details on the submitted information in this questionnaire are required?

- Yes
- No

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#### Identification of the respondents

\*1. Please provide your first name

100 character(s) maximum

\*2. Please provide your last name

100 character(s) maximum

\*3. Please provide your email address

\*4. In what capacity are you completing this questionnaire?

- In my personal capacity  
 On behalf of an organisation, association, company, authority etc.

If you are responding on behalf of an organisation/company/public authority/association, please answer questions 5 to 8.  
If you are responding in a personal capacity, please answer questions 9 to 10.

**\*5.** Please identify clearly which organisation / association / company / authority you represent?

100 character(s) maximum

BIN gegen Bahnlärm e.V.

**\*6.** Please specify your country/countries of operation/competence/activities

(multiple answers are possible)

- |                                                 |                                          |                                         |
|-------------------------------------------------|------------------------------------------|-----------------------------------------|
| <input type="checkbox"/> EU-wide                | <input type="checkbox"/> Global          | <input type="checkbox"/> Austria        |
| <input type="checkbox"/> Belgium                | <input type="checkbox"/> Bulgaria        | <input type="checkbox"/> Croatia        |
| <input type="checkbox"/> Cyprus                 | <input type="checkbox"/> Czech Republic  | <input type="checkbox"/> Denmark        |
| <input type="checkbox"/> Estonia                | <input type="checkbox"/> Finland         | <input type="checkbox"/> France         |
| <input checked="" type="checkbox"/> Germany     | <input type="checkbox"/> Greece          | <input type="checkbox"/> Hungary        |
| <input type="checkbox"/> Ireland                | <input type="checkbox"/> Italy           | <input type="checkbox"/> Latvia         |
| <input type="checkbox"/> Lithuania              | <input type="checkbox"/> Luxembourg      | <input type="checkbox"/> Malta          |
| <input type="checkbox"/> Netherlands            | <input type="checkbox"/> Poland          | <input type="checkbox"/> Portugal       |
| <input type="checkbox"/> Romania                | <input type="checkbox"/> Slovak Republic | <input type="checkbox"/> Slovenia       |
| <input type="checkbox"/> Spain                  | <input type="checkbox"/> Sweden          | <input type="checkbox"/> United Kingdom |
| <input type="checkbox"/> Other (please specify) |                                          |                                         |

If Other, please specify

**\*7.** Is your organisation registered in the Transparency Register of the European Commission?

- Yes  
 No

**\*If yes, please enter the identification number (numbers only)**

89836352054803

**8.** Please provide the address of your organisation / association / authority

200 character(s) maximum

c/o  
Stadtinfo Bad Honnef  
Rathausplatz 2-4  
D 53604 Bad Honnef

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## Part II: Questionnaire

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### 1. Rail freight

a) What is your perception of rail freight, as a transport mode, in general?

- Very positive  
 Positive  
 Somewhat positive  
 Negative  
 No opinion

b) In order to transport goods, in your opinion, which mode is the most adapted (for goods which can be carried by any of these three modes):

	Road	Rail	Inland waterways	No opinion
for long distance	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
for short distance	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

c) Demand for goods to be transported is expected to significantly grow in the next decades. In general, do you think that freight should be carried on roads or on more energy-efficient modes of transport such as rail or inland waterways?

- More on roads
- More on more energy-efficient modes of transport
- Both (more on road and on more energy-efficient modes of transport)
- Neither of the two, the growth in needs for transport services should be limited
- No opinion

d) In your opinion, do you think that a part of the freight currently carried by road should be shifted onto rail?

- Yes, rail freight should absorb a large part of road freight transport
- Yes, rail freight should absorb a small part of road freight transport
- No, the current mix is adequate
- No, road freight should absorb a small part of rail freight transport
- No, road freight should absorb a large part of rail freight transport

e) In your opinion, do you think that the railway system should play a long term role for the transport of goods?

- Yes
- No
- No opinion

f) Would you have any comment on rail freight in general?

1,400 character(s) maximum

Schiengüterverkehr macht Sinn, wenn Gefahrgüter transportiert werden müssen, da diese auf der Straße höheren Unfallwahrscheinlichkeiten ausgesetzt sind. Auf der anderen Seite sind die bestehenden Schienenwege nicht auf Gefahrstofftransport ausgelegt. Es fehlen Retentionsräume für austretende Flüssigkeiten, Abstandsflächen zu Bebauungen und Zuwegungen für Rettungskräfte.

## 2. Rail Freight Corridor concept

The Rail Freight Corridor concept is specified in Regulation (EU) 913/2010 (<http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32010R0913>). A Rail Freight Corridor (RFC) is constituted of railway lines, linking two or more terminals along a predefined principal route (a focus is put on the main international rail freight routes) and is managed by a governance structure ensuring the coordination of Member States, the coordination of railway infrastructure managers (a railway infrastructure manager is any body or firm responsible in particular for establishing, managing and maintaining railway infrastructure, including traffic management) and the participation of railway undertakings and terminal managers. The establishment of Rail Freight Corridors and their corresponding governance structures aims at improving the conditions for rail freight traffic along these corridors and to trigger its development in terms of volume, market share, quality and reliability.

In particular, it aims to foster: cooperation between the different stakeholders; coordination in terms of capacity offering, traffic management, infrastructure works and conditions of use of the infrastructure; the harmonisation of processes and rules; and development of the infrastructure and the related coordination in terms of investments.

The establishment and development of a Rail Freight Corridor is based on a (regularly updated) comprehensive Transport Market Study. The development of the Rail Freight Corridor is monitored through a yearly performance report and a yearly customer satisfaction survey.

a) Do you consider the Rail Freight Corridor approach to be relevant in order to boost the competitiveness of rail freight?

- Very relevant
- Relevant
- Somewhat relevant
- Not relevant
- No opinion

b) How significant do you think the contribution of the RFCs could be to cross-border rail freight?

- Very significant

- Significant
- Somewhat significant
- Not significant
- No opinion

Please comment

700 character(s) maximum

**3. Challenges faced by European rail freight**

The challenges for European cross-border rail freight transport could be categorized 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).

In your opinion, does the Rail Freight Corridor concept have the potential to address these challenges?

	Yes, very well	Yes	Yes, but only to a certain extent	No, not at all	No opinion
QUALITY challenge	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
COST challenge	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
SERVICE challenge	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
POLITICAL challenge	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
EUROPEAN challenge	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you see any other main challenges faced by European cross-border rail freight, please give details

700 character(s) maximum

Die Herausforderung wird sein, ein zukunftsfähiges Schienengüterverkehrssystem Umwelt- und Menschenverträglich in unsere Siedlungsräume zu integrieren. Sofern dies nicht ernst genommen wird, wird der Widerstand in der Bevölkerung gegen dieses System wachsen.

If you listed other challenges, does the Rail Freight Corridor concept have the potential to address these?

700 character(s) maximum

Nein.  
 Das Rail Freight Corridor Concept beschäftigt sich überhaupt nicht mit der Frage, wie Strecken und Fahrzeuge designet sein müssen, damit der Betrieb langfristig in Übereinstimmung mit den externen Belangen des Städtebaus, der übrigen Wirtschaft und der Gesundheit der Menschen durchgeführt werden kann. Hier fehlt es an der Betrachtung der Probleme und an der Schaffung von Lösungswegen. Insofern hat diese Regulierung den Charakter eines Vertrages zu Lasten Dritter. Sie steht auf tönernen Füßen.

**4. Stakeholders' involvement and governance of the Rail Freight Corridors**

A range of stakeholders are directly participating in the Rail Freight Corridors: primarily the Member States, the railway infrastructure managers, the railway undertakings and the terminal managers, but also the rail regulatory bodies and the European Commission. Through the setting-up of working groups on specific topics, National Safety Authorities and the European Railway Agency can also be involved.

a) Would you have any suggestion on any other stakeholder(s) to be involved?

- Yes
- No
- No opinion

If yes, please comment

700 character(s) maximum

In Deutschland wurden bis heute (2016) keine Strecken errichtet, die für den Betrieb von Güterfrachtkorridoren geeignet wären. Sie sind auch nicht in Sicht. Für die Unternehmungen unter Regulation (EU) 913/2010 wurde bislang das vorhandene Streckennetz verwendet, das für diesen Zweck nicht errichtet wurde und durch die Wohngebiete der Städte verläuft. Durch den (vor allem nächtlichen) Betrieb entstehen extreme Schäden an den Siedlungsgebieten, sowie an der Gesundheit und Wirtschaftskraft der betroffenen Bevölkerung. Diese Richtlinie ignoriert diese Tatsache völlig. Natürlich müssen die von den externen Auswirkungen Betroffenen in die Planung der Korridore einbezogen werden.

The formal governance structure of the Rail Freight Corridors is the following:

- an Executive Board composed of Member State representatives, and responsible for defining the general objectives of the Rail Freight Corridor and supervising its functioning.
- a Management Board composed of railway infrastructure managers, in charge of implementing the corridor, in particular through providing coordinated rail capacity, setting up a Corridor-One Stop Shop as single contact point for requesting this rail capacity, developing an indicative investment plan, through the coordination of infrastructure works and of traffic management etc.
- two Advisory Groups, one for railway undertakings and one for terminal managers, which may issue opinions and representing the interests of these two categories of stakeholders within the Rail Freight Corridor.

b) Do you have any comments on the governance structure of the Rail Freight Corridors?

700 character(s) maximum

Es fehlen folgende Disziplinen, die an der Planung und dem Betrieb der Korridore nicht beteiligt werden:  
Raumplanung, Städtebau, Gesundheit, Umwelt, Wirtschaft, Kultur, Kirchen.

## 5. Punctuality

a) In your opinion, during times of disruption, under which circumstances should **passenger trains** have priority over freight trains?

700 character(s) maximum

Personenzüge müssen immer Vorrang vor Güterzügen haben.  
Dies ergibt sich alleine aus der Tatsache, dass aus Städtebaulichen Gründen der öffentliche Personennahverkehr benötigt wird, um der Zersiedelung entgegenzuwirken und den Bau neuer Strasseninfrastruktur zu minimieren.

b) In your opinion, during times of disruption, under which circumstances should **freight trains** have priority over passenger trains?

700 character(s) maximum

Niemals. Uns fällt kein einziges Argument dafür ein.

## 6. Infrastructure development

Do you think that the coordination of infrastructure investments across borders by the Rail Freight Corridors would have a positive impact and bring benefits?

- Yes, to a large extent  
 Yes, to a small extent  
 No  
 No opinion

Please comment

700 character(s) maximum

Am Beispiel des Corridor Rhine-Alpine:  
Holland hat die Betuwe-Line vor einigen Jahren fertig gestellt. Die Schweiz hat den Gotthart Tunnel fertig gestellt und wird die NEAT bis 2020 in Betrieb haben. In Deutschland wird es in den nächsten 30 Jahren keinen funktionierenden Korridor geben, da nur wenige Teile bislang geplant sind. In Bau ist noch nichts.  
Die vorhandenen Strecken können für den Korridor nicht verwendet werden, da sie hierfür wegen der exorbitanten externen Schäden des innerörtlichen Schienengüterverkehrs nicht geeignet sind.

## 7. Corridor One-Stop-Shop (C-OSS)

A Corridor- One-Stop-Shop is set up by the Management Board as single contact point for the users of the Rail Freight Corridor to request infrastructure capacity (time slots to run trains on the railway infrastructure) for freight trains crossing at least one border.

a) Do you think that the concept of Corridor One-Stop-Shop brings benefits to European cross-border rail freight?

- Yes, to a large extent
- Yes, to a small extent
- No
- No opinion

b) Do you think that it would be beneficial if the different Corridor One-Stop-Shops of the different Rail Freight Corridors would cooperate more closely and jointly set up a single internet-based interface displaying the rail infrastructure capacity for the entire network of Rail Freight Corridors and providing information concerning the use of the Rail Freight Corridors?

- Yes
- No
- No opinion

Please comment

700 character(s) maximum

**8. Performance**

a) In your opinion, would it be useful to set targets for the effectiveness of the Rail Freight Corridors in order to boost European rail freight?

- Very useful
- Useful
- Somewhat useful
- Not useful
- No opinion

b) Do you think that targets in the following areas would be useful:

	Very useful	Useful	Somewhat useful	Not useful	No opinion
Traffic volumes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Quality of the services	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Infrastructure quality	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

c) Do you have any other suggestions for targets, the setting up of which would be useful to the Rail Freight Corridors?

700 character(s) maximum

In Deutschland muss das Hauptziel auf der Schaffung geeigneter Strecken sein, auf denen nächtliche Schienengüterverkehr möglich ist, ohne in großindustriellem Maßstab die menschliche Gesundheit und Wirtschaftskraft zu beschädigen. So lange das nicht gegeben ist, muss durch betriebliche Maßnahmen sichergestellt werden, dass Wohngebiete an den Bestandsstrecken weiter für gesundes Wohnen nutzbar bleiben. Ein sofortiger Stop aller Nacht- und Wochenendfahrten auf den Bestandskorridoren ist notwendig. Falls diese Nachtfahrverbote nicht angeordnet werden, steigt laufend die Wahrscheinlichkeit eines juristischen Erfolges eines Anwohners mit dem Ziel, den Verkehr in Wohngebieten zu unterbinden.

**9. Language on the Rail Freight Corridors**

Would you see an added value in having a single operational language along:

a) The cross-border sections?

- Yes
- No

b) All the Rail Freight Corridors?

- Yes
- No

Please comment

700 character(s) maximum

Wir leben in Europa. Wir sind es gewohnt, mit der Vielzahl an Sprachen umzugehen. Dies sollte der Eisenbahnsektor auch können.

### 10. Digital solutions

Taking account of the cooperation taking place through the governance structure of the Rail Freight Corridors, 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  
 No  
 No opinion

if yes, please list which one and/or in which field

700 character(s) maximum

Nach der Meinung verschiedener Experten ist ein elektronisch gesteuerter Verkehr, der mit ca. 30-50 km/h abgewickelt wird leistungsfähiger, als die Steuerung durch Menschen mit bis zu 120 km/h. Die niedrigen Geschwindigkeiten würden gleichzeitig helfen, die externen Schäden durch Lärm und Erschütterungen zu reduzieren.

### 11. Coherency with the EU Transport policy and legislation

The objective of Regulation (EU) 913/2010 (<http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32010R0913>) is primarily to boost international rail freight through the setting up and development of international Rail Freight Corridors. Do you think that it is coherent with the broader EU Transport policy, and in particular with the White Paper on Transport of 2011 (<http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52011DC0144>), which sets amongst other things the objectives 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 large extent  
 Yes, to a small extent  
 No  
 No opinion

If yes, do you consider that the Rail freight Corridor concept is the right tool to contribute to the modal shift to rail?

- Yes  
 No  
 No opinion

### 12. Area of activities

In your opinion, are there issues (e.g. as regards interoperability, technical and operational barriers or noise mitigation), which the Rail Freight Corridors could particularly play a role in tackling?

- Yes  
 No  
 No opinion

If yes, please, explain which:

700 character(s) maximum

Alleine am Corridor Rhine-Alpine in Deutschland versterben jährlich 3.000 Menschen vorzeitig an schweren Erkrankungen, die durch den Schienengüterverkehr ausgelöst werden. Eine dreifache Anzahl an Menschen erkrankt jedes Jahr an schweren Krankheiten: Herz-Kreislauf-Erkrankungen, Entwicklungsstörungen, Depressionen, Angststörungen etc. etc.. Schienengüterverkehr innerhalb von Wohngebieten tötet. Daneben bestehen die Schäden an der Wirtschaft und Immobilienwirtschaft sowie die Behinderung der städtebaulichen Entwicklungen in unseren Städten.  
 Wer Schienengüterkorridore betreiben will, muss zuerst welche bauen. In Deutschland gibt es keine.

### 13. Barriers

Do you see any operational or technical barriers which should particularly be tackled in order to boost traffic on the Rail Freight Corridors, and more generally rail freight in Europe?

- Yes  
 No  
 No opinion

If yes, please comment

700 character(s) maximum

Allgemein nutzbare Schienennetze innerhalb von Siedlungsgebieten sind generell ungeeignet für einen leistungsfähigen Schienengüterverkehr, da sie konkurrieren mit dem Personenverkehr, sie sind extrem teuer im Unterhalt (Kurven, Schranken, Brücken etc.) und haben eine geringe Leistungsfähigkeit. Zudem steigt das Risiko der Beschränkung oder Stilllegung durch juristische Erfolge von Anwohnern.

#### 14. Research and innovation

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?

700 character(s) maximum

Entwicklung leiser Fahrzeuge.  
Bau reiner Güterverkehrsstrecken.  
Selbstfahrende Waggon, die sich in Verkehrsströme selbsttätig einreihen.

b) Do you see any specific innovation which could be implemented in the Rail Freight Corridors and which would benefit rail freight in Europe?

700 character(s) maximum

Alle Technologien, die den Verkehr Menschen verträglich machen.  
Reduzierung von Lärm, Erschütterungen und städtebaulichen Beeinträchtigungen.

#### 15. Any further suggestion

Have you any other suggestion for the development of the Rail Freight Corridors and more generally of rail freight in Europe?

700 character(s) maximum

Es ist schwer verständlich, dass die EU eine Regulierung erlässt, ohne eine vorherige Technikfolgenabschätzung vorzunehmen. Weshalb wird eine Technik forciert, die wirtschaftlich nicht leistungsfähig ist und gleichzeitig externen Schaden in einem Maß erzeugt, das jede Vorstellung sprengt? Weshalb versucht die EU nicht, die externen Schäden festzustellen und zu quantifizieren? Hier wurde der zweite Schritt vor dem ersten gemacht. Statt dessen wurde einfach begonnen. Entstanden ist eine Umweltkatastrophe, die jährlich viele Tausend Menschen in Europa das Leben kostet, Millionen von in Krankheit verbrachten Lebensjahren produziert und uns allein in Deutschland über 20 Mrd. EUR Schaden pa kostet.

#### Useful links

About this questionnaire ([http://ec.europa.eu/transport/modes/rail/consultations/2016-european-rail-network-for-competitive-freight\\_en.htm](http://ec.europa.eu/transport/modes/rail/consultations/2016-european-rail-network-for-competitive-freight_en.htm)) ([http://ec.europa.eu/transport/modes/rail/consultations/2016-european-rail-network-for-competitive-freight\\_en.htm](http://ec.europa.eu/transport/modes/rail/consultations/2016-european-rail-network-for-competitive-freight_en.htm))

#### Contact

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