

CATF Comments on Inception Impact Assessment for Revision of the TEN-T Regulation

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The Clean Air Task Force (CATF), a climate and energy research and advocacy organization with offices in the US and Europe, welcomes the European Commission's climate ambition, leadership on decarbonization and innovation, and pursuit of policies to decouple greenhouse gas emissions from economic growth. CATF appreciates the opportunity to provide the following comments to the Commission on the Inception Impact Assessment (IIA) for the Revision of Regulation on Union Guidelines for the development of the trans-European transport network (TEN-T).

Comments on context and problem definition

CATF agrees that a variety of evolving environmental, economic, and political factors necessitate changes in TEN-T policy, and that "Europe's transport infrastructure policy needs to be strengthened to enable an accelerated market penetration of vehicles and vessels with zero and low emissions of greenhouse gases and air pollutants." (IIA at 1) In particular, CATF supports the Commission's assessment that "strong emphasis must be placed on infrastructure quality enhancements." (IIA at 1) The necessary transition to widespread use of zero carbon energy carriers—primarily electricity, hydrogen, and hydrogen-based fuels—in the transportation sector will require significant upgrades to Europe's existing energy infrastructure and the development of new infrastructure.

As discussed in the context of Problem 1 in the IIA, the existing TEN-T will not stimulate the zero and low emission transport systems needed to decarbonize Europe's transportation sector. CATF agrees that the "lack of continuous and coherent coverage of alternative fuel infrastructure for all TEN-T modes" will impede the transition to zero emission road vehicles, aircraft, maritime vessels, and trains. (IIA at 2)

As the Commission notes, "insufficient synergy" between TEN-T and the Trans-European Networks-Energy (TEN-E) Regulation creates additional challenges. The Commission warns that the lack of synergy between TEN-T and TEN-E could affect "the energy network related support for high-capacity recharging *as well as, possibly*, hydrogen refueling infrastructure." (IIA at 2 (emphasis added)) From CATF's perspective, poor alignment between TEN-T and TEN-E will *certainly* hinder the build-out of critically important hydrogen refueling infrastructure. Hydrogen and ammonia (a zero-carbon hydrogen-based fuel) will help accelerate the pace and lower the cost of eliminating emissions from heavy duty freight trucks, maritime vessels, and other vehicles—provided energy policy and transportation policy are appropriately aligned.

Comments on objectives and policy options

CATF supports the introduction of "binding requirements for recharging and refueling infrastructure for zero and low emission vehicles and vessels for all transport modes," such as "sufficient fast charging capabilities and hydrogen refueling stations along motorways for both

light and heavy-duty vehicles, for both passenger and freight transport” (IIA at 3). Electricity and hydrogen each offer different advantages to different transportation use-cases, and full decarbonization will likely depend on the wide-scale development of infrastructure that supports both fast charging and hydrogen refueling.

CATF also encourages the Commission to develop policy measures that support “the deployment of high-power charging facilities and new flexible bunkering infrastructures to provide large quantities of sustainable alternative fuels for different segments in ports and alongside European rivers.” (IIA at 3) Importantly, ports provide concrete opportunities for the Commission to align TEN-T transportation policy and TEN-E energy policy. Ports can serve as hubs for modern energy and transportation systems, by hosting a synergistic web of on- and off-shore energy producers, energy storage facilities, energy transporters (pipelines, tanker ships, etc), and transportation sector end-users (ammonia-fueled maritime vessels, battery-powered forklifts, fuel cell-powered freight trucks, etc.).

CATF looks forward to engaging further with the Commission as it proceeds with its important and timely revision of the TEN-T regulation.

Sincerely,

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Clean Air Task Force