

## Revision of the TEN-T Regulation

CATF is an international non-profit organisation that works to safeguard against the worst impacts of climate change by catalysing the rapid global development and deployment of low-carbon energy and other climate-protecting technologies through research and analysis, public advocacy leadership, and partnership with the private sector.

CATF strongly supports the EU's ambition to become climate neutral by 2050 and welcomes the revision of the trans-European transport network (TEN-T) Regulation to ensure compatibility with the Green Deal objectives and to support the decarbonisation process of the transport system. CATF considers that the decarbonisation of transport should be the main focus of the revision, and is pleased to provide the following comments in response to the [Revision of Regulation](#) on Union Guidelines for the Development of TEN-T.

### Requirements and targets

To achieve the decarbonisation of European transport and reach climate neutrality, both electrification and low and zero carbon fuels (such as hydrogen and ammonia, which is made by combining hydrogen with nitrogen captured from ambient air) will play a key role. The Hydrogen Strategy rightfully identified hydrogen and electrification as key technologies to achieve clean road freight. Hydrogen and ammonia will accelerate the cutting of emissions from heavy duty freight trucks, maritime vessels, and other vehicles at low-cost.

In 2017, greenhouse gas emissions from the transport sector represented 24% of the total EU emissions and is significantly lagging in emissions decline when compared to other sectors. Decarbonisation of the transport sector requires, among other aspects, the adoption of alternative fuels vehicles and vessels to achieve net-zero by 2050. However, lack of recharging infrastructure and refuelling stations of zero-carbon fuels such as hydrogen, hinder the growth of alternative fuels vehicles market share and ultimate GHG emissions.

TEN-T should ensure that the infrastructure needed for electricity, hydrogen, and hydrogen-based fuels is available for the different transport modes and on both the core and comprehensive networks. Therefore, CATF supports the introduction of binding requirements for recharging and refuelling infrastructure for zero and low emission vehicles and vessels for all transport modes. We also call for binding targets for each Member States on public chargers and refuelling infrastructure, with the goal of ensuring the coverage of the TEN-T Core & Comprehensive networks with ultra-fast chargers and alternative fuels infrastructure by 2025. Moreover, the requirements for alternative fuels availability on the core network should be extended to the comprehensive network both for road and waterways.





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## Coherence and synergies

Several pieces of legislation currently under revision will directly impact European transport and its decarbonisation. We are therefore stressing the need for coherence and synergies between TEN-T on the one hand and TEN-E, the Directive on deployment of alternative fuels infrastructure (AFID), and FuelEU Maritime on the other hand. The Commission should ensure that these four initiatives strengthen each other and aligned to foster a fast deployment of zero-carbon fuels.

A lack of synergy could seriously delay the decarbonisation of transport. TEN-E and TEN-T are both needed to ensure the energy network related support for high-capacity recharging and hydrogen refuelling infrastructure. A lack of alignment between TEN-T and TEN-E would hinder the build-out of critically important hydrogen refuelling infrastructure and, since each step of the Hydrogen Strategy depends on the existence of key infrastructure, put at risk the implementation of the Hydrogen Strategy and its key role in the reaching the Green Deal ambitions.

## Focus areas

CATF calls for the adoption of focus area 4: an approach combining the three first focus areas and including:

- Focus area 1: emphasising a “traditional” infrastructure development concept with the integration of binding requirements for recharging and refuelling infrastructure for low and zero emission vehicles and vessels.
- Focus area 2: strengthening the concept of infrastructure quality, for enabling more efficient and sustainable transport services and ensuring a more resilient TEN-T, in the light of climate change.
- Focus area 3: Improving digitalisation and innovation in TEN-T policy.

The efficient decarbonisation of transport will require important investments in infrastructure, with binding requirements and targets on recharging and refuelling infrastructure for low and zero emission vehicles and vessels, as proposed in the focus area 1. Infrastructure needs to be improved and upgraded to enable and accelerate the deployment and market penetration of vehicles and vessels with zero and low emissions of greenhouse gases and air pollutants. It should be combined with the attention paid to resilience, infrastructure quality, and the efficiency gains from the focus area 2.

CATF considers that innovation and research also need to play a central role in decarbonising transport and TEN-T should foster stronger links with Research & Innovation, as proposed in the focus area 3.