

**CONSULTATION ON MEASURES FOR A ‘RAIL NETWORK  
GIVING PRIORITY TO FREIGHT’**  
**Response from the European Passengers’ Federation**

1. The European Passengers’ Federation (EPF) is an association of passenger organisations from throughout Europe. EPF’s associated organisations are based in fourteen EU member states and in Switzerland and, between them, cover over three quarters of the population of the enlarged European Union. Its purpose is to further the interests of passengers at the European level. EPF is particularly concerned with the advancement of passengers’ rights and with the promotion of sustainable mobility. EPF seeks to work constructively with operators and decision-makers. It is committed to improving standards on all modes of public transport in Europe.
2. EPF broadly welcomes the initiative of the European Commission reflected in its Communication of 18<sup>th</sup> October 2007 entitled “Towards a rail network giving priority to freight”. Although the EPF exists to promote the interests of passengers we support the Commission’s initiative as consistent with the EPF’s promotion of sustainable mobility more generally.
3. We have studied the questionnaire seeking the views of interested parties on the possible measures that might be incorporated into strengthened legislation at European level. We have reluctantly concluded that we are not in a position to complete the questionnaire. As a precondition for completion its format requires a response to the prioritisation of a number of technical issues that go beyond the remit of EPF. We consider that this functional requirement detracts from the consultation. We have therefore resolved to ask the Commission services to treat this paper as our formal response.
4. As an organisation that exists to promote the interests of passengers we are concerned that plans for the development of a rail network that gives priority to freight could have perverse impacts on the interests of passengers. Freight and passenger services frequently share the same network. Their provision cannot be considered in isolation from one another. Instead, it is important to seek synergies in network provision. A Commission initiative in relation to the freight network should be matched by a similar initiative in relation to the passenger network and the needs of both should then be addressed in a complementary manner

5. We consider that shortage of capacity is the major obstacle to the achievement of a significant increase in the modal share attracted to rail in the EU. Capacity constraints are frequently characterised by bottlenecks at key junctions or over particular sections of vital routes or by the competing demands of different classes of traffic. We are concerned that, unless steps are taken to ensure the supply of adequate capacity for all classes of traffic, any attempt to manage the situation through the prioritisation of demand could have an adverse and inequitable impact on some classes of user.
6. It is essential that, before any attempt is made to prioritise demand, the Commission's proposals for freight should be accompanied by the development of concrete plans and the identification of associated funding to address the existing capacity limitations of the European rail network. Plans for a freight network should be accompanied by a parallel set of proposals to enable enhancement of the European passenger network, both for high-speed services and for those regional and local services that are vital to the promotion of sustainable mobility.
7. We consider that fair competition and a customer-led approach is vital to the management of such developments. We therefore see the translation into effective policy measures of the Commission's current work on the internalisation of external costs in transport as a valuable tool in establishing fair competition.
8. However, the combination of market transparency and comprehensive fair trading legislation themselves are unlikely to be sufficient to ensure the changes essential to achieving a customer-led transport environment in the railway sector. A veritable revolution in the culture of railway management is required. EPF considers that the Commission has a potential contribution to make in achieving a move from the traditional operator-led approach of railway managers to a culture that is customer focussed: the Commission should initiate the development of a comparative scoreboard of end-user (freight and passenger) satisfaction. Such a scoreboard should be up-dated on a regular basis and the measures of satisfaction promoted through Europe's media.
9. As far as the specifics of the Commission's proposals for freight are concerned, we consider that the Commission should clarify that the development of the freight network will not be at the expense of existing passenger services or of those that might reasonably be expected to develop on existing parts of the network over the next twenty years. End-users of the rail network (both passengers and freight) will need assurance that the Commission is properly seized of the capacity

constraints of the existing network and of the further risks to its efficiency and effectiveness that may arise from the implementation of the Commission's proposals for freight in the absence of ameliorative interventions.

10. The Commission should invite the EU's infrastructure managers to work together in preparing a report that identifies the specific infrastructure capacity limitations of Europe's rail network, both passenger and freight. This would provide a focus for route planning and development at European level. Following completion of this exercise, implementation of the Commission's proposals should be conditional on agreement on the allocation of sufficient funds to obviate the impacts on passenger services of any developments arising from a rail network giving priority to freight.

**European Passengers Federation**  
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