



Council of the European Union  
General Secretariat

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**Interinstitutional files:  
2021/0420 (COD)**

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**Brussels, 22 September 2022**

**WK 12083/2022 ADD 5**

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**NOTE**

From:	General Secretariat of the Council
To:	Working Party on Transport - Intermodal Questions and Networks
N° prev. doc.:	ST 7456/1/22 REV 1
N° Cion doc.:	ST 15109/21
Subject:	Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on Union guidelines for the development of the trans-European transport network, amending Regulation (EU) 2021/1153 and Regulation (EU) No 913/2010 and repealing Regulation (EU) 1315/2013 - Comments by Estonia on Sections 3, 6 and 7 of Chapter III

Delegations will find attached comments by Estonia on Sections 3, 6 and 7 of Chapter III as presented in ST 7456/1/22 REV 1.

**EE written comments**

- Article 25 -2a – To have an obligation to by default „ensure“ that all comprehensive ports are connected with rail is too extensive in our view. We suggest to move rail under „where possible“ like inland waterways.
- Article 25 -2b – We do not support this automatic obligation in such a horizontal manner. Would be reasonable to have some minimal threshold for freight volume or have it as where possible/feasible clause.
- Article 25- paragraph 3 – support PRES changes.
- Article 26 - paragraph 3 – support PRES changes.
- Article 35 paragraph 4 – We join the Member States who think that the approach here should be as market based as possible. We propose to use different language here e.g. „Member States shall make the best efforts in order to promote the development of multimodal freight terminal network“ „and shall notify the steps taken for promoting..“
- Article 36 – the scope of application should only be new terminals built after the entry into force of this regulation or alternatively we suggest to delete this article.
- Article 37 paragraph 1 – We suggest to go back to wording of make all possible efforts. Horizontally for this article. The scope of application should only be new terminals built after the entry into force of this regulation or alternatively we suggest to delete this article.
- Article 40 – 1-c-iv- to perhaps make more explicit that at the discretion of the Member State to decide whether economically viable.