



Council of the European Union  
General Secretariat

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**Brussels, 30 September 2022**

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## **WORKING DOCUMENT**

From:	General Secretariat of the Council
To:	Working Party on Transport - Intermodal Questions and Networks
N° prev. doc.:	ST 12250/22
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 1, 2, 4 and 5 of Chapter III

Delegations will find attached comments by Estonia on sections 1, 2, 4 and 5 of Chapter III of the above proposal as presented in ST 12250/22.

## EE written comments

- Article 15 – 2b – necessary here to find a solution that reflects the practical implications of different isolated networks together with the obligation from the summer TEN-T proposal to study the possible migration.
- Article 17 – Automatic ERTMS exemption possibility is necessary for isolated networks – at least in our case.
- Article 29 – In general, supporting the direction of the changes made and very thankful for the new compromise.  
Paragraph 2a(i)(ii) could still be quite problematic in some cases.  
Paragraph 2b – perhaps could be „average distance“ instead of „maximum“ distance? It would give a little bit more flexibility for the Member States. Average distance could be used for both the rest areas and for the safe and secure parking areas. In addition, we also suggest to consider increasing the distance numbers here a bit. E.g. rest areas at average distance of 80km and safe and safe and secure parking areas at average distance of 120km. For additional flexibility, distance from the network could be increased to 4 or 5km instead of 3km. This might be necessary in exceptional specific cases e.g. depending on specific landscape or the location of relevant facilities.  
Paragraph 2d – We suggest to have “on average” every 300km.  
Paragraph 4 – very important to have „shall“ together with the reasonable threshold of 10k.
- Article 30 – We of course understand that Core and Extended core networks requirements are considerably more intense than the Comprehensive network requirements. In this context, reasonable exemptions (paragraph 5) are most important to us here as we may need it for several sections of our Core network.
- Article 33 – We are thankful for the additional explanation by the Commission. However, we still do have considerable reservations here as we are not sure that this requirement is cost-efficient and reasonable at all airports currently in the scope deriving from very different climate conditions and very different volume needs to have pre-conditioned air supply.