



# Revising the EU Guidelines for the trans-European Transport Network (TEN-T Regulation)

European Disability Forum Analysis  
January 2022

**EDF Analysis of the European Commission Proposal for revision of Regulation on Union guidelines for the development of the trans-European transport network.**



This publication has received financial support from the European Union. The information contained in this publication does not necessarily reflect the official position of the European Commission.

## Table of Contents

|  |    |
|--|----|
| Table of Contents .....  | 2  |
| The European Disability Forum .....  | 3  |
| Executive Summary .....  | 3  |
| Easy to Read.....  | 6  |
| Introduction.....  | 7  |
| What is the TEN-T Regulation? .....  | 7  |
| Why is TEN-T relevant for persons with disabilities? .....                       | 7  |
| Analysis of the TEN-T proposal .....   | 8  |
| Structure .....  | 8  |
| Timeline .....   | 8  |
| Consistency with other EU policies .....   | 8  |
| Objectives of the trans-European transport network.....                          | 9  |
| Compliance of TEN-T projects with accessibility and non-discrimination law ..... | 9  |
| General priorities for the TEN-T network.....                                    | 9  |
| Additional requirements for rail and road transport infrastructure .....         | 10 |
| Urban nodes .....  | 10 |
| New technologies and innovation .....  | 11 |
| Accessibility for all users.....   | 12 |
| Reporting and monitoring .....   | 12 |
| European Transport Corridors.....  | 12 |
| European Coordinators .....  | 13 |
| Working Groups.....  | 13 |
| Work plans .....   | 13 |
| Engagement of stakeholders .....   | 14 |
| Implementing acts .....  | 14 |
| Recitals .....   | 15 |
| Funding .....  | 15 |
| Concluding recommendations.....  | 16 |
| Strengthen and clarify accessibility .....                                       | 16 |
| Mainstream accessibility throughout the TEN-T.....                               | 17 |
| Set targets and timelines.....   | 18 |

|   |    |
|---|----|
| Expand scope in relation to accessibility .....   | 18 |
| Establish rules for accessibility funding .....   | 18 |
| Strengthen monitoring and reporting .....   | 19 |
| Ensure meaningful participation persons with disabilities in implementation of the TEN-T..... | 19 |
| Ensure accessibility of TEN-T infrastructure in cooperation with third countries .....        | 20 |
| Ensure consistency with Disability Rights Frameworks .....                                    | 20 |
| Improve wording .....   | 20 |
| Next steps .....  | 21 |
| Reference Documents .....   | 21 |
| Annex I – references to disability/ and accessibility provisions in TEN-T proposal.....       | 22 |
| ANNEX II – Structure of the proposal text.....  | 27 |
| Document credits .....  | 29 |

## The European Disability Forum

The European Disability Forum is an independent NGO that represents the interests of 100 million Europeans with disabilities. EDF is a unique platform which brings together representative organisation of persons with disabilities from across Europe. EDF is run by persons with disabilities and their families. We are a strong, united voice of persons with disabilities in Europe.

## Executive Summary

The European Commission’s proposal to revise the trans-European transport networks guidelines (TEN-T proposal/the proposal) provides a solid basis for improving the legal framework to advance accessibility of intermodal transport for persons with disabilities. However, to be effective and practical, TEN-T should add more concrete requirements for development and funding of TEN-T projects.

The following elements of the proposal are good and should be maintained in the final text:

- Horizontal requirement on accessibility for all users, including for persons with disabilities and reduced mobility (Article 49).

- New intermediate deadline of 2040 for the development of the TEN-T network.
- Consideration of increasing the benefits for transport users, including persons with disabilities and reduced mobility as one of the objectives of TEN-T (Article 4).
- Compliance of the TEN-T Regulation with relevant Union and national laws, including in relation to state aid, public procurement, and accessibility, and EU non-discrimination law (Article 8).
- Giving priority to measures that contribute to, among other aims, improving accessibility for all users, including persons with disabilities or reduced mobility (Art. 12).
- Additional accessibility and disability-related requirements for rail and road transport infrastructure (Articles 19 and 31).
- Accessibility and disability-related requirement for the development and implementation (including monitoring) of sustainable urban mobility plans (Article 40 and Annex V).
- Requirements to improve accessibility through new technologies, including by multimodal digital mobility services and improved access to travel information (Article 44).
- Possibility to set up European working groups on interoperability, cross-boarder passenger rail services, urban nodes, cooperation with third countries or other topics as needed (Article 52).

However, to be effective the text of the proposal must be strengthened and clarified further. Some shortcomings of the current text include:

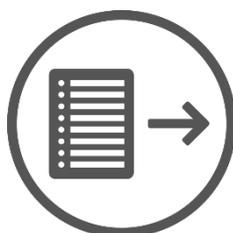
- Lack of quantitative or qualitative indicators, targets and timelines for improving accessibility of the TEN-T network.
- Lack of clear references to relevant EU accessibility law such as the Rail Accessibility Regulation (TSI-PRM) or the European Accessibility Act, and the UN CRPD.
- Lack of accessibility and disability-related requirements when setting additional priorities for inland waterway (Art. 23), maritime (Art. 27), air transport (Art. 34), multimodal transport (Art. 38) infrastructure, or for urban nodes (Art. 41).
- Lack of accessibility and interoperability requirements for vehicles, vessels, aircrafts, and rolling stocks which use the TEN-T infrastructure.
- Lack of earmarked funding or prioritization of projects to improve accessibility of the TEN-T network, as well as lack of transparency how TEN-T development funds are used in relation to accessibility (improving or creating more barriers).
- Lack of requirements for publishing accessible data on accessibility of TEN-T projects.

- Lack of assurances for meaningful involvement of organizations with disabilities in setting priorities for the TEN-T network development and involvement in projects.
- Lack of accessibility requirements for development of infrastructure in third countries supported by EU that connects to the TEN-T network.
- Use of language inconsistent with the CRPD.

## Easy to Read



This page is about **new rules for accessible travel with different transport types** in Easy to read, for example going to the airport by train and taking a plane, or taking a bus to the sea and then a ship.



If you want more of this document in Easy to Read,



+ 32 2 282  
46 00



[info@edf-  
feph.org](mailto:info@edf-feph.org)

You can phone us at  
**+ 32 2 282 46 00**

Or email us at  
[info@edf-feph.org](mailto:info@edf-feph.org)

## Introduction

This document provides a first assessment of the [European Commission's proposal for revision of the Union guidelines for the development of the trans-European transport network \(TEN-T Regulation \(EU\) No 1315/2013\)](#) which was published on 14 December 2021. It analyses the current proposal against the [original TEN-T Regulation](#) and [EDF's 2021 Position Paper on TEN-T](#).

## What is the TEN-T Regulation?

The Union guidelines for the development of the trans-European transport network (TEN-T Regulation) is an EU legal framework which regulates the development of a Europe-wide network of railways, roads, inland waterways, maritime shipping routes, ports, airports, and railroad terminals. The objective of TEN-T is to support stronger social, economic, and territorial cohesion in the EU by closing gaps, removing obstacles and technical barriers in trans-European transport routes. It aims to make European transport greener, interoperable, and more inclusive.

## Why is TEN-T relevant for persons with disabilities?

The TEN-T Regulation has been an important EU law for improving accessibility of transport infrastructure for persons with disabilities, persons with reduced mobility and older persons. Although it has been difficult to assess the effectiveness of accessibility requirements in practice, the original law has recognized accessibility of the trans-European transport network for all users, including for persons with disabilities in Article 37.<sup>1</sup> In the current proposal for revising the TEN-T Regulation accessibility for persons with disabilities is also mainstreamed in different parts of the legal draft, as will be discussed further in this analysis.

---

<sup>1</sup> As you can see in Annex I of this document, accessibility for all users is in Article 49 of the new proposal.

## Analysis of the TEN-T proposal

Below, is a brief analysis of the TEN-T proposal, largely in comparison to the original TEN-T Regulation.

### Structure

The structure of the specific requirements in the proposal is organized by transport modes (under Chapter III) rather than by network layers (core and comprehensive<sup>2</sup>) as before.

### Timeline

A new intermediate deadline (2040) is added to ensure a stepwise approach toward 2050. Therefore, the trans-European transport network must be gradually developed in three steps: the completion of a core network by 31 December 2030, of an extended core network by 31 December 2040 and the comprehensive network by 31 December 2050 (Art. 6).

### Consistency with other EU policies

The TEN-T is an instrument for meeting the goals set by the EU Green Deal in relation to multi-modal transport. Therefore, the proposal has a stronger focus on sustainability of transport, as well as digital innovation and social impact. It makes links to the EU Sustainable and Smart Mobility Strategy, the proposals for revision of the Intelligent Transport Systems (ITS) Directive, the Urban Mobility Package, including sustainable urban mobility plans (SUMP), the Alternative Fuels Infrastructure Regulation proposal, and EU non-discrimination law. It notes that TEN-T aims to benefit transport modes for all users by making them more affordable and accessible.

However, there are no direct references to the UN Convention on the Rights of Persons with Disabilities (CRPD), the EU Strategy for the rights of persons with disabilities 2021-2030, EU Regulation (1300/2014) on the technical specifications for interoperability relating to accessibility of the Union's rail system for persons with disabilities and persons with reduced mobility (TSI-PRM), the European Accessibility Act, or any of the European accessibility standards (e.g. on built environment or digital accessibility).

---

<sup>2</sup> In fact, there are now three identified layers: core, extended core, and comprehensive.

## Objectives of the trans-European transport network

The proposal maintains a similar approach to the original text in that it considers increasing the benefits for transport users, including persons with disabilities and reduced mobility as one of the objectives of TEN-T. There are some changes in wording: notably:

- Removing 'elderly people' and **adding the notion of "people in situations of vulnerability"** (Art. 4.d.i);
- Adding that TEN-T must establish infrastructure requirements, which ensure quality, efficiency and sustainability of **transport services which are accessible and affordable** (Art. 4.d.iii);
- Noting that TEN-T must ensure efficient and fast deployment of **emergency and rescue services, including for persons with disabilities or reduced mobility** (Art. 4.d.iv).

## Compliance of TEN-T projects with accessibility and non-discrimination law

Projects of common interest, which are essentially the TEN-T projects, must meet certain requirements. This was already established in the original TEN-T, which noted that Member States must take measures to ensure that the projects under TEN-T are carried out in **compliance with relevant Union and national law, including in relation to state aid, public procurement, and accessibility.**<sup>3</sup>

**In the proposal compliance with EU non-discrimination law is also added** (Art.8.4).

## General priorities for the TEN-T network

The proposal notes that when developing the network priority should be given to measures which are necessary to reach several aims. It clarifies that the general priorities apply to the whole TEN-T network with all its three layers (i.e., core, extended core, and comprehensive network).

The measures that should be given priority must contribute to, among other aims, improving accessibility for all users, including persons with disabilities or reduced mobility (Art. 12). In the original TEN-T Regulation there was a conditional 'where appropriate' wording in relation to improving accessibility, which has been removed from the proposal.

---

<sup>3</sup> Art.7.4 of Regulation (EU) No 1315/2013

## Additional requirements for rail and road transport infrastructure

In addition to the general priorities noted above, the proposal notes that in TEN-T projects attention must be given to:

1. ensuring the continuity and **accessibility of pedestrian and cycling paths** in order to promote the active modes of transport when building or upgrading railway infrastructure (Art. 19.f - Railway transport infrastructure).
2. improving and promoting road safety, taking into account the **needs of vulnerable users and road users in all their diversity, in particular persons with reduced mobility** (Art 31.a - Road transport infrastructure).
3. ensuring the continuity and **accessibility of pedestrian and cycling paths** in order to promote the active modes of transport when building or upgrading road infrastructure (Art 31.d - Road transport infrastructure).

**However, there are no comparable additional priorities for inland waterway (Art. 23), maritime (Art. 27), air transport (Art. 34), multimodal transport (Art. 38) infrastructure, or for urban nodes (Art. 41).**

## Urban nodes

However, for urban nodes, the proposal is more advanced in its requirements.

It requires Member States to ensure by 31 December 2025

1. the adoption of a sustainable urban mobility plans (SUMP)<sup>4</sup> in line with Annex V of the proposal (Art 40.b.i). Annex V has requirements for improving accessibility of the functional urban area, facilitating seamless and sustainable mobility between different transport modes, improving road safety in particular of vulnerable road users, involving citizens and civil society in development and implementation of SUMPs, and including objectives, targets and indicators for monitoring implementation of SUMPs, including in relation to access to mobility services.

---

<sup>4</sup> sustainable urban mobility plan' (SUMP) means a document for strategic mobility planning, aiming at improving accessibility to and mobility within the functional urban area (including commuting zones) for people, businesses and goods" (Art 3.o).

2. the collection and submission to the Commission of urban mobility data per urban node including on access to mobility service. Thereafter these data must be submitted every year (Art. 40.b.ii).<sup>5</sup>

Additionally, by 31 December 2030 Member States must ensure

1. sustainable, seamless and safe interconnection between rail, road, air, the active modes of transport and, as appropriate, inland waterway and maritime infrastructure (Art. 40.c.i);
2. the ability for passengers to access information, book, pay their journeys and retrieve their tickets through multimodal digital mobility services (Art 40.c.ii).

It is important to note that urban mobility remains mainly under the remit of the Member States (local authorities) and EU action is limited to aspects connected with interregional and international traffic.

In this way, the TEN-T is linked with another EU initiative, proposal to revise the Urban Mobility Framework.

## New technologies and innovation

To keep up with innovative technological developments, the **TEN-T requires Member States to aim for improving accessibility and interoperability of the network**, among other aims. This was already included in the original Regulation, but the proposal improves with further details and requirements.

It notes that **improving accessibility** can be done **through the development of multimodal digital mobility services and the development of infrastructure that allows for seamless multimodality**, such as high-speed rail and city train/tram connection at airports (Art. 44.e).

The aim of promoting efficient ways to provide **accessible information to all users of transport services regarding interconnections, interoperability and multimodality** remains (Art. 44.f).

An additional aim of providing **accessible information to all users regarding the environmental impacts of their transport choices** is introduced in the proposal (Art. 44.g).

---

<sup>5</sup> The proposal also requires the European Commission to adopt, no later than one year after the entry into force of the revised TEN-T an implementing act establishing a methodology for collecting this data.

## Accessibility for all users

The proposal maintains the aim of making TEN-T more **accessible for all users, including for persons with disabilities and reduced mobility**. In the original regulation the main article with this requirement was Article 37, which corresponds with **Article 49** in the current proposal. There have been some changes in the phrasing of the article though.

For example, the wording **'people in situations of vulnerability' has been introduced**, removing reference to 'elderly people' and adding persons living in outermost regions and other remote, rural, insular, peripheral and mountainous regions as well as sparsely populated areas.

Importantly, the requirement of the original TEN-T Regulation that **"the design and construction of transport infrastructure shall comply with the relevant requirements laid down in Union law<sup>6</sup>" has been removed in the proposal.**

## Reporting and monitoring

TEN-T requires Member States to report to the European Commission on regular basis on the progress of projects and investments for that purpose. The proposal notes that the European Commission must ensure that the interactive geographical and technical information system for TEN-T (TENtec) is publicly and easily accessible. TENtec must contain project-specific and updated information on the forms and amounts of Union co-funding as well as on the progress of each project." (Art. 55.2).

There is **no mentioning of specific indicators, including of accessibility, that should be reported through the database or otherwise.**

'Easily accessible' wording is not very clear, and **reference to the European Accessibility Act would help ensure accessibility of the database for persons with disabilities.**

## European Transport Corridors

An important instrument of the implementation of the TEN-T network are the European Transport Corridors.<sup>7</sup> They must consist of the parts of the trans-European transport network which are of the highest strategic importance for the development of sustainable and multimodal transport flows in Europe and for the development of interoperable high-quality infrastructure and operational performance (Art. 7).

---

<sup>6</sup> For example, TSI-PRM and the European Accessibility Act.

<sup>7</sup> The European Transport Corridors are as specified in the maps in Annex III of the TEN-T Proposal.

**Article 50 determines what the Corridors must focus on certain aims. Accessibility is unfortunately not one of the mentioned aims.**

## European Coordinators

To support the coordinated implementation of the European Transport Corridors the European Commission will, in agreement with relevant Member States, designate one European Coordinator for each Corridor (Art. 51.1).

The Coordinator will have a number of responsibilities, including **drawing up a work plan** together with Member States for the development of each Corridor, and monitor its implementation and **annual status reports** on implementation (Art. 51.5). The Coordinator will also **identify and prioritise investment needs for the rail passenger lines** of the European Transport Corridors, and monitor administrative, operational and interoperability aspects of passenger traffic on the rail passenger lines of the European Transport Corridors, including **monitoring the performance of rail passenger services** (Art. 51.7).

## Working Groups

There will be an official "Corridor Forum" chaired by the Coordinator to support its work (Art. 52.1), but **the Coordinator can also set up focused working groups on** interoperability, cross-boarder passenger rail services, urban nodes, cooperation with third countries or other **topics as needed** (Art. 52.3).

The Coordinator **may consult stakeholders such as transport users and representatives of civil society in relation to the work plan and its implementation, but is not obliged to do so** (Art. 52.6).

## Work plans

As mentioned, each European Coordinator of the European Transport Corridors must draw up a **work plan with relevant Member States on the development of the network in specific Corridors**.

A first such plan must be drawn up the latest two years after the entry into force of the revised TEN-T Regulation, after which every four years (Art. 53.1). Each **work plan will be approved by Member States** that are concerned with the particular Corridor (Art. 53.2).

Work plans must outline, among other things, at least compliance of the corridor with the TEN-T transport infrastructure requirements, the achieved progress, required investments, funding sources, possible

solutions to barriers such as those related to passenger lines, and intermediate targets for the removal of physical, technical, digital, operational and administrative barriers between and within transport modes, including for passenger transport (Art. 53.3).

In the meantime, the European Coordinator will support Member States in implementing the work plan, including for setting priorities, project and investment planning, setting timelines, and the establishment of a single entity for the construction and management of cross-border infrastructure projects (Art. 53.4).

## Engagement of stakeholders

The proposal establishes that whenever it is appropriate local civil society organisations, among other stakeholders, may be consulted and involved in the planning and construction phase of projects. This should be done in accordance with national procedures on consultation. In the meantime, the European Commission will promote exchange of good practices, including related to consultation and inclusion of “people in situations of vulnerability” (Art. 57).

It is appropriate to mention here that **Article 4.3 of the CRPD requires Member States and the EU to involve organisations of persons with disabilities in development and implementation of legislation and policies, and decision-making processes that affects persons with disabilities.**

The original TEN-T text was more detailed, acknowledging that stakeholders could contribute to reach different aims, for example to promoting sustainable transport solutions, such as enhanced accessibility by public transport.<sup>8</sup>

## Implementing acts

The TEN-T gives the European Commission powers to adopt implementing acts to support the implementation of TEN-T, including for:

1. establishing a single entity for the construction and management of cross-border infrastructure projects of common interest (Art. 8.5)
2. establishing a methodology of urban mobility data collection by Member States covering at minimum access to mobility service, among other indicators (Art. 40).
3. setting out the priorities for infrastructure and investment planning and for funding of European Transport Corridor work plans (Art 54.1)

---

<sup>8</sup> Art. 50.3.d of Regulation (EU) No 1315/2013

4. implementation of specific sections of the European Transport Corridor.

## Recitals

Recital 10 refers to accessibility of the TEN-T network for all transport users, with emphasis on regions that are particularly affected by the negative impacts of climate change.

The original text of the TEN-T Regulation also had a recital noting that Member States should carry out ex-ante assessments of the accessibility of infrastructure and of the services connected to it.<sup>9</sup> This has now been removed from the proposal. **It would be more beneficial to build on this recital and include mandatory provisions for assessment of accessibility in the main text of the proposal.**

## Funding

TEN-T will largely be financed by public funding (national public funds, EU funds) and amounting to €244.2 billion. The main funding instrument will be the [Connecting Europe Facility \(CEF\)](#). Additionally, TEN-T will be funded by the European Structural and Investment Funds (ESIF), and the Recovery and Resilience Fund (RRF).

---

<sup>9</sup> Recital 39 of Regulation (EU) No 1315/2013

## Concluding recommendations

The TEN-T proposal provides a solid basis for improving the legal framework to advance accessibility of intermodal transport for persons with disabilities. However, to be effective and practical, TEN-T should add more concrete requirements for development and funding of TEN-T projects. For example, it is not clear what is meant by accessibility of the TEN-T network, or how it will be measured, as there are no quantitative or qualitative indicators, targets for improvement, and no clear references to relevant EU accessibility law such as the Rail Accessibility Regulation (TSI-PRM) or the European Accessibility Act. There are also no timelines to track improvement of accessibility towards 2050.

We therefore have several recommendations on improving the draft proposal during the legislative process to ensure that TEN-T actually improves accessibility of the trans-European transport network for persons with disabilities.

### Strengthen and clarify accessibility

- First of all, the requirement that **"the design and construction of transport infrastructure shall comply with the relevant requirements laid down in Union law"** should be **reintroduced in Article 49**. This reference was present in the original TEN-T Regulation<sup>10</sup> but somehow has been removed.
- TEN-T notes that measures to improve accessibility for all users should be one of the general priorities for developing the network (Art. 12). However, it does not say what would be considered appropriate measures for this purpose. This should be clarified in the final text of the revised TEN-T.
- This can be done by introducing a **new Annex detailing accessibility requirements for elements of TEN-T infrastructure** by referencing relevant EU accessibility laws and standards, such as the European Accessibility Act,<sup>11</sup> EU Rail Accessibility Regulation (TSI-PRM),<sup>12</sup> European Standard on accessibility and usability of the built environment (EN17210<sup>13</sup>) and European Standard on accessibility requirements for ICT products and services (EN301549<sup>14</sup>). There are already similar examples on

<sup>10</sup> Article 37 of Regulation (EU) No 1315/2013

<sup>11</sup> [Directive \(EU\) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services](#)

<sup>12</sup> [Commission Regulation \(EU\) No 1300/2014 of 18 November 2014 on the technical specifications for interoperability relating to accessibility of the Union's rail system for persons with disabilities and persons with reduced mobility](#)

<sup>13</sup> See [European Standard on accessibility and usability of the built environment \(EN17210\)](#);

<sup>14</sup> See [European Standard on Accessibility requirements for ICT products and services \(EN301 549\)](#)

which such an Annex in TEN-T can build on, for examples the built environment accessibility requirements (Annex III) of the European Accessibility Act, the Annex of the Rail Accessibility Regulation (TSI-RPM), and essential requirements (Annex III) of the EU Directive on the interoperability of the rail system within the EU.

## Mainstream accessibility throughout the TEN-T

Although the proposal does a good job in further mainstreaming accessibility for TEN-T, this can be developed more:

- For example, one of the objectives of TEN-T is to ensure efficient and fast deployment of emergency and rescue services, including for persons with disabilities or reduced mobility (Art. 4.d.iv). Accessibility is also important here, as persons with disabilities should be able to exercise a level of independence during emergency situations: for example, be able to leave a transport service with all other passengers through accessible escape routes instead of having to wait for rescue services to evacuate them.
- While there are some accessibility requirements in the additional priorities for rail (Art. 19.f) and road transports (Art. 31.a and d), there are no comparable requirements when setting additional priorities for inland waterway (Art. 23), maritime (Art. 27), air transport (Art. 34), multimodal transport (Art. 38) infrastructure, or for urban nodes (Art. 41). Given the absence of accessibility legislation when it comes to water, air, and urban transport services, TEN-T should at least set minimum priorities for these modes of transport.
- Improving accessibility for all users should be one of the focus areas of European Transport Corridors (Art. 50).
- Work plans developed by the European Coordinators detailing the compliance of the Corridors with the TEN-T (Art. 53.3), should also include accessibility targets, with minimum indicators and timelines, including related to accessibility funding.
- Accessibility should also be incorporated in measures by the European Coordinators to support Member States in setting priorities, project and investment planning, timelines, and the establishment of a single entity for the construction and management of cross-border infrastructure (Art. 53.4).
- If a single entity for the construction and management of cross-border infrastructure is established, they should be mandated to advance and monitor accessibility through TEN-T projects (Art. 8.5)
- Finally, accessibility should be mainstreamed in Annex V of the TEN-T proposal, which sets out the requirements for urban nodes for the development of Sustainable Urban Mobility Plans (SUMPs).

## Set targets and timelines

- Based on the short, intermediate, and long-term development targets for TEN-T (2030, 2040, and 2050), the TEN-T should establish targets and deadlines for improving accessibility of the network.
- The established targets and deadlines can be supported by including accessibility indicators and targets in the work plans developed for the European Transport Corridors.

## Expand scope in relation to accessibility

- The revised TEN-T Regulation should require that vehicles, vessels and rolling stock using TEN-T infrastructure are interoperable with it and accessible for persons with disabilities. Otherwise, a TEN-T project aiming to improve accessibility of a train station will still be inaccessible for passengers with disabilities if the trains passing through this station are inaccessible and incompatible with the train station.

## Establish rules for accessibility funding

As mentioned, TEN-T will largely be financed by public funding including EU funds such as the [Connecting Europe Facility \(CEF\)](#), the European Structural and Investment Funds (ESIF), and the Recovery and Resilience Fund (RRF).

However, the proposal of a project to improve accessibility must come from the national authorities. So, country governments have freedom which types of projects they want to prioritize and ask funding for. This means, that while there will be around €244.2 billion to develop TEN-T infrastructure, Member States can use it for other priorities than advancing accessibility for persons with disabilities. Therefore, apart from specific requirements detailed in the above-mentioned funds, TEN-T should set minimum rules and:

- Earmark funding for which only projects intending to advance accessibility of the network are eligible.
- Ensure that no project funded under TEN-T is used to develop the network in a way that creates accessibility barriers for persons with disabilities.
- Increase transparency and accountability of funding by providing publicly available, easy to find, easy to understand, and accessible information on award criteria, awarded projects, as well as implementation and outcomes of projects in view of improving accessibility for persons with disabilities.

## Strengthen monitoring and reporting

When it comes to reporting on TEN-T progress, it is not clear how improvement in accessibility and occurring issues will be tracked. There is no mentioning of indicators or methodology for monitoring progress on accessibility of the whole network, apart from a plan for the European Commission to develop a methodology of urban mobility data collection, which also addressed access to transport services.

- TEN-T should first of all make a clear requirement to report data on accessibility, including of existing barriers, progress on advancing accessibility of the network, and funding for that purpose.
- Based on this requirement the European Commission, could develop a methodology for monitoring advancement of accessibility of all TEN-T projects
- To support data collection on accessibility, TEN-T should also ensure simple, easy to find, and accessible means of feedback mechanisms by transport users, when they encounter accessibility barriers during intermodal travel.
- Accessibility data should be available through the interactive geographical and technical information system for TEN-T (TENtec). This database should be accessible for persons with disabilities by meeting existing harmonised accessibility standards.<sup>15</sup>

## Ensure meaningful participation persons with disabilities in implementation of the TEN-T.

The proposal does not guarantee involvement of stakeholders such as organisations of persons with disabilities and accessibility experts in the development and implementation of TEN-T projects. It rather leaves this to national rules, while the European Commission will promote good practices of consulting stakeholders such as 'people of situations of vulnerability' (Art 57).

Similarly, the Coordinators of the European Transport Corridors are not obliged to consult civil society actors for developing and implementing TEN-T work plans (Art. 52.6).

- TEN-T should establish that structured dialogue with representatives of transport users, including organizations of persons with disabilities and accessibility experts should be enabled. This obligation should lie on European and national public authorities mandated with the coordination of TEN-T as required under Article 4.3 of the CRPD.

---

<sup>15</sup> See [European Standard on Accessibility requirements for ICT products and services \(EN301 549\)](#)

- Since many organizations of persons with disabilities lack sufficient financial and human resources for participation, TEN-T should require that their participation is financed by public funding.
- All procedures, meetings, documents, and consultation measures must be accessible for persons with disabilities.

### **Ensure accessibility of TEN-T infrastructure in cooperation with third countries**

When supporting, including financially, projects of common interest to connect the trans-European transport network with infrastructure networks of neighbouring countries, the requirements and conditions for accessibility set for the TEN-T network should apply.

### **Ensure consistency with Disability Rights Frameworks**

Improving accessibility through the TEN-T stems from EU's obligations to the UN Convention on the Rights of Persons with Disabilities (CRPD) and priorities of the Strategy for the rights of persons with disabilities 2021-2030. The revised TEN-T Regulation should therefore make clear reference to them.

### **Improve wording**

When referring to persons with disabilities, reduced mobility, persons living in outermost regions and other remote, rural, insular, peripheral and mountainous regions as well as sparsely populated areas, the TEN-T proposal uses the phrasing "people in situations of vulnerability". This wording does not sufficiently reflect the issue of connectivity, accessibility, and affordability of transport for everyone in the EU irrespective their accessible needs, socio-economic status or place of residence. Lack of choice of accessible and affordable transport services is what creates this "vulnerability".

- Therefore, it is better to use for example "people experiencing accessibility, connectivity, economic or other barriers to transport" or "people without equal access to transport".

## Next steps

- There is an open public consultation by the European Commission for giving feedback to the published proposal with the deadline of 9 March 2022. [You can access the consultation survey via this link.](#)
- EDF will also reply to this consultation.
- We will also update our [existing position paper on the TEN-T](#) and use it for advocacy towards the European Commission, Parliament, and Council during the coming negotiations.
- Some national governments have already started consulting national stakeholders, and we encourage organizations with disabilities to provide feedback to ensure strong advocacy for improving accessibility of the TEN-T network.

## Reference Documents

- [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 \(COM/2021/812 final\)](#)
- [Regulation \(EU\) No 1315/2013 of the European Parliament and of the Council of 11 December 2013 on Union guidelines for the development of the trans-European transport network and repealing Decision No 661/2010/EU](#)
- [EDF Position Paper on Union Guidelines for the development of the trans-European transport network \(TEN-T\)](#)

## Annex I – references to disability/ and accessibility provisions in TEN-T proposal<sup>16</sup>

### Recital 10

In order to achieve a high-quality and efficient transport infrastructure across all modes, the development of the trans-European transport network should take into account the security and safety of passengers and freight movements, the contribution to climate change and the impact of climate change and of potential natural hazards and human-made disasters on infrastructure and **accessibility for all transport users**, especially in regions that are particularly affected by the negative impacts of climate change.

### Recital 51

As an effective single framework for tackling urban mobility challenges, urban nodes should develop a Sustainable Urban Mobility Plan (SUMP), which is a long-term, all-encompassing integrated freight and passenger mobility plan for the entire functional urban area . It should include objectives, targets and indicators underpinning the current and future performance of the urban transport system, at minimum, on greenhouse gas emissions, congestion, accidents and injuries, modal share and **access to mobility services**, as well as data on air and noise pollution in cities.

### Article 3 – Definitions

(o) 'sustainable urban mobility plan' (SUMP) means a document for strategic mobility planning, aiming at improving **accessibility** to and mobility within the functional urban area (including commuting zones) for people, businesses and goods;

### Article 4 - Objectives of the trans-European transport network

1. The overall objective of the development of the trans-European network is to establish one multimodal Union wide network of high quality standards.
2. The trans-European transport network shall strengthen the social, economic and territorial cohesion of the Union and contribute to the creation of a single European transport area which is sustainable, efficient and resilient and which increases the benefits for its users and supports

---

<sup>16</sup> The following search keywords were used: **disab**; **access**; TSI-PRM; 1300/2014; **reduced**; PRM; CRPD; 2019/882; **vulnerab**

inclusive growth. It shall demonstrate European added value by contributing to the objectives laid down in the following four categories:

(d) increasing the benefits for its users through:

(i) ensuring the accessibility for and meeting the mobility and transport needs of users, taking into account in particular the needs of people in situations of vulnerability, including persons with **disabilities or reduced mobility** and people living in remote regions, including the outermost regions and islands;

(iii) the establishment of infrastructure requirements, in particular in the field of interoperability, safety and security, which ensure quality, efficiency and sustainability of **transport services which are accessible and affordable**;

(iv) supporting mobility that is fit for the changing climate and resilient to natural hazards and human-made disasters, and ensures efficient and fast deployment of emergency and rescue services, including for **persons with disabilities or reduced mobility**

#### **Article 8 - Projects of common interest**

4. Member States shall take all necessary measures to ensure that the projects are carried out in compliance with relevant Union and national law, in particular with Union legal acts on the environment, climate protection, safety, security, competition, state aid, **public procurement**, public health and **accessibility** as well as **legislation on non-discrimination**.

#### **Article 12 - General priorities for the core, the extended core and the comprehensive network**

1. In the development of the core, the extended core and the comprehensive network, general priority shall be given to measures that are necessary for:

(h) improving the quality of services and social conditions for transport workers, accessibility for all users, including **persons with disabilities or reduced mobility** and other people in situations of vulnerability;

#### **Article 19 - Additional priorities for railway infrastructure development**

In the promotion of projects of common interest related to railway infrastructure, and in addition to the general priorities set out in Articles 12 and 13, attention shall be given to the following:

(f) when building or upgrading railway infrastructure, ensure the continuity and **accessibility**<sup>17</sup> of pedestrian and cycling paths in order to promote the active modes of transport;

### **Article 31 - Additional priorities for road infrastructure development**

In the promotion of projects of common interest related to road infrastructure, and in addition to the general priorities set out in Articles 12 and 13, attention shall be given to the following:

(a) improvement and promotion of road safety, taking into account the needs of vulnerable users and road users in all their diversity, in particular **persons with reduced mobility**;

(d) when building or upgrading road infrastructure, ensure the continuity and **accessibility**<sup>18</sup> of pedestrian and cycling paths in order to promote the active modes of transport.

### **Article 40 - Urban nodes requirements**

When developing the trans-European transport network in urban nodes, in order to ensure the effective functioning of the entire network without bottlenecks, Member States shall ensure:

(b) by 31 December 2025:

(i) adoption of a **sustainable urban mobility plan (SUMP)** in line with Annex V that includes notably measures to integrate the different modes of transport, to promote efficient zero-emission mobility including sustainable and zero-emission urban logistics, to reduce air and noise pollution and that takes long-distance trans-European transport flows into consideration;

(ii) collection and submission to the Commission of urban mobility data per urban node covering at minimum greenhouse gas emissions, congestion, accidents and injuries, modal share and **access**<sup>19</sup> **to mobility service**, as well as data on air and noise pollution. Thereafter these data shall be submitted every year;

(c) by 31 December 2030:

(ii) for passenger transport: ability for passengers to **access information**, book, pay their journeys and retrieve their tickets through multimodal digital mobility services;

The Commission shall adopt, no later than one year after the entry into force of this Regulation an **implementing act establishing a**

---

<sup>17</sup> Needs to be clarified if this is 'accessibility for persons with disabilities'

<sup>18</sup> Needs to be clarified if this is 'accessibility for persons with disabilities'

<sup>19</sup> Need to clarify 'accessibility for persons with disabilities'

**methodology for the data to be collected by the Member States referred to under point (ii) of paragraph (b).** That implementing act shall be adopted in accordance with the examination procedure referred to in Article 59(3).

### **Article 44 - New technologies and innovation**

In order for the trans-European transport network to keep up with innovative technological developments and deployments, Member States shall aim in particular to:

(e) improve the operation, management, **accessibility**, interoperability, multimodality and efficiency of the network, including through the development of multimodal digital mobility services and the development of infrastructure that allows for **seamless multimodality**, such as high-speed rail and city train/tram connection at airports;

(f) promote efficient ways to provide **accessible** and comprehensible information to all users and providers of transport services regarding interconnections, interoperability and multimodality;

(g) promote efficient ways to provide **accessible** and comprehensive information to all users and providers of transport services regarding the environmental impacts of their transport choices;

### **Article 49 - Accessibility for all users**

Transport infrastructure shall allow seamless mobility and accessibility for all users, in particular people in situations of vulnerability including **persons with disabilities or reduced mobility** as well as persons living in outermost regions and other remote, rural, insular, peripheral and mountainous regions as well as sparsely populated areas.

### **Article 55 - Reporting and monitoring**

2. The Commission shall ensure that TENtec is publicly and **easily accessible**<sup>20</sup>, allowing for an automated data exchange with national systems and other relevant Union applications and data sources. TENtec shall contain project-specific and updated information on the forms and amounts of Union co-funding as well as on the progress of each project.

### **Article 57 - Engagement with public and private stakeholders**

National procedures regarding the involvement and consultation of regional and local authorities and civil society concerned by a project of common interest shall be complied with, where appropriate, in the planning and construction phase of a project. **The Commission shall promote the exchange of good practice in this regard, notably as**

---

<sup>20</sup> Need to clarify 'accessibility for persons with disabilities'

**regards the consultation and inclusion of people in situations of vulnerability.**

## **ANNEX V - Sustainable Urban Mobility Planning Requirements for Urban Nodes**

This annex sets out the requirements for urban nodes for the development of Sustainable Urban Mobility Plans.

**1. Goals and objectives:** A Sustainable Urban Mobility Plan (SUMP) shall have as central goal **improving accessibility of the functional urban area** and providing high-quality, safe and sustainable low-emission mobility to, through and within the functional urban area. It shall notably support zero-emission mobility and the implementation of an urban transport system which contributes to a better overall performance of the trans-European transport network, in particular through the development of infrastructure for the seamless circulation of zero-emission vehicles as well as of multimodal passenger hubs to facilitate first and last mile connections and of multimodal freight terminals serving urban nodes.

**3. Integration of the different modes of transport:** A SUMP shall promote multimodal transport through the integration of the different modes and measures aimed at **facilitating seamless and sustainable mobility**. It shall include actions to increase the modal share of the more sustainable forms of transport such as public transport, active mobility, and, as appropriate, inland waterway and maritime transport. It shall also include actions to promote zero-emission mobility, in particular with regard to the greening of the urban fleet, to reduce congestion and to **improve road safety in particular of vulnerable road users**.

**5. Participatory approach:** The development and implementation of a SUMP shall be based on an integrated approach with a high level of cooperation, coordination and consultation between the different levels of government and relevant authorities. **Citizens as well as representatives of civil society and economic actors shall also be involved**.

**6. Monitoring and performance indicators:** A SUMP shall include objectives, targets and indicators underpinning the current and future performance of the urban transport system, at minimum, on greenhouse gas emissions, congestion, accidents and injuries, modal share and **access to mobility services**, as well as data on air and noise pollution in cities. The implementation of a SUMP shall be monitored using performance indicators. Member States and the relevant authorities shall implement mechanisms to ensure that a SUMP is in line with the provisions of this Annex and of high quality.

## ANNEX II – Structure of the proposal text

### Recitals

#### Chapter I: General principles

- subject matter
- scope
- definitions
- objectives
- geographical scope and European transport corridors (ETC)
- principles of the projects of common interest
- principles of the cooperation with third countries

#### Chapter II: General provisions

- specifying the core, the extended core and the comprehensive network
- European Transport Corridors (ETCs)
- prioritisation of measures on the different networks

#### Chapter III: Specific provisions

- requirements for each mode of transport, considering:
  - definition of infrastructure components
  - transport infrastructure requirements for the comprehensive network
  - requirements for the core and extended core network
  - additional priorities.
- requirements for multimodal freight terminals
- requirements for urban nodes

#### Chapter IV: Provisions for smart and resilient transport

- requirements related to:
  - ICT systems for transport
  - sustainable services
  - new technologies and innovation
  - safe and secure infrastructure
  - resilience
  - investments by third countries
  - maintenance and project life-cycle
  - **accessibility for all users**

#### Chapter V: Implementation of instruments of European Transport Corridors and horizontal priorities

- describes the instrument of ETC and the horizontal priorities
- provisions on how they shall be coordinated and governed

- provisions on the implementation tools e.g. the coordinators work plans and the implementing acts

## **Chapter VI: Common provisions**

- reporting and monitoring obligations
- procedures for updating the network
- principles for engagement with public and private stakeholders
- alignment of national plans with EU transport policy
- delegation, committee procedure, review of the Regulation
- delays in implementing the network
- exemptions
- impact of the Regulation on other legislative acts - need for their amendment

## **Annexes:**

- Annex I- maps of the core, extended core and the comprehensive network
- Annex II - lists of transport and urban nodes in the scope of this Regulation
- Annex III - alignment and maps of the European Transport Corridors
- Annex IV - indicative maps for the neighbouring countries
- Annex V - **requirements for the development of Sustainable Urban Mobility Plans**
- Annex VI- VII - article amending Regulation (EU) 2021/1153 and a correlation table between Regulation (EU) 1315/2013 and this Regulation

## Document credits

This document was prepared by Mher Hakobyan, EDF Accessibility Officer ([mher.hakobyan@edf-feph.org](mailto:mher.hakobyan@edf-feph.org)).



The European Disability Forum  
Mundo Madou  
Avenue des Arts 7-8  
1210 Brussels, Belgium.

[www.edf-feph.org](http://www.edf-feph.org)

[info@edf-feph.org](mailto:info@edf-feph.org)

This publication has received financial support from the European Union. The information contained in this publication does not necessarily reflect the official position of the European Commission.

