Dear Ms Adina Valean

Commissioner for Transportation

Email: <u>cab-valean-contact@ec.europa.eu</u>

Address: Rue de la Loi / Wetstraat 200

1049 Brussels

Belgium

Lisboa, 21 September 2020

Subject: risk of Isolation of the Portuguese economy – clarification of the vrail component of the

TEN-T in Portugal

Dear Commissioner Alina Valean: we would like to thank you for the answer to our letter dated 30th July 2020,

that Mr Herald Ruijters wrote to us on your behalf.

It is extremely positive that you refer explicitly the commitment of the EU with a new UIC gauge rail network

in Portugal by 2030, when you state that "The new rail lines which are or will be constructed and the rail lines

which are or will be upgraded on that Corridor by 2030 (e.g. Lisboa-Porto, Sines-Grandola-Lisboa-Merida) are

creating a UIC gauge rail network in Portugal". This is fully in line with the conclusions of the TEN-T Core

Network Corridors. Atlantic Corridor. Final Report, dated December 2017, that we quote (page 185): "the most

important interventions include: the deployment of UIC track gauge on the Iberian Peninsula". This is also an

essential issue to Portugal, as the competitiveness of our economy, our capacity to attract and maintain

investments and jobs depends on our integration on the EU market. However, your answer is also

disappointing due to the difference/incompatibility between the objectives just referred, and the concrete

policies to achieve those objectives. Your answer does not contain the information we asked for: "we would

like that you inform us if the EU Commission will recognize the eventual certification as interoperable of lines

of the Core Network in Iberian gauge". This implies that the EU Commission does not deny the possibility of

recognizing as interoperable, the portuguese lines of the EU Core Network (Atlantic Corridor) that, in reality

are not interoperable with the other lines of the EU Core Network. It will be a certification on paper of

something that does not exist in reality. This will be done in a framework in which the Portuguese authorities

have already declared that Portugal does not need the UIC rail gauge, and the existing investment plans up to

2030 do not include the construction or modernisation of a single kilometre of rail line in UIC gauge until that

date (please see evidences in Annex 1). This certification would also contradict the above mentioned Report

that states (chapter 10.3, pag 185) that "delivering interoperability means agreeing on the deployment of UIC gauge along the Corridor lines".

Other motive of concern is the fact that the portuguese government has "informed" INEA that the change to the UIC gauge in the portuguese lines of the EU Core Network will be done in full synchrony with Spain¹. For the Portuguese government this means that Portugal will only start after Spain finishes, as we demonstrate in Annex 2. In our letter of 30th July to you, we also mentioned the example of Spain, that started the process of introducing the UIC gauge in its rail network 32 years ago and hasn't finished yet.

Another aspects of EU management of the construction of the Atlantic Corridor raise concern: one of the most relevant ones is the fact that the design of the rail infrastructures in some lines of the Atlantic Corridor is based on studies about future demand which ignore EU transport policies of transferring freight traffic for medium and large distances from the roads to rail and maritime transport. This is the case of the International Corridor North, from Aveiro to Salamanca (Spain), the most important one for portuguese exports, which is a single line with a capacity incompatible with the objectives of EU transport policies. Details of the justification of this statement are given in Annex 3.

The perception of the Portuguese public opinion, based on public statements of EU officials, including your letter to us, and on the distortion of those statements by the media, is that the EU Commission fully supports the policies of the Portuguese Government (Annex 4), despite some warnings the Commission has issued, and that we referred in our letter of 30th July. This contributes to maintain the Portuguese public opinion in the ignorance of the path of Portugal to economic isolation from its main trade partners (the EU Member States), and consequent empoverishment to which these policies condemn our country. The future of Europe cannot be built in this way. The European Union has given Europe peace and economic development as never before in European History. But to pursue this path, besides trust and solidarity between European peoples, it is necessary that their leaders have a clear vision for the future of the Union and leadership capacity to implement it.

Therefore, we ask you i) to use all the instruments at your disposal, including funding instruments (CEF, EU Next Generation and PT20-27), to implement EU transport policies referred to in the 2nd paragraph of your letter, and ii) to be clear in the communication to the Portuguese people about this issue. The first objective implies to strongly stimulate the Portuguese government to build, by 2030 or shortly afterwards, the portuguese lines of the Atlantic Corridor with UIC rail gauge, high capacity (double track), and competitive

¹ https://ec.europa.eu/inea/en/connecting-europe-facility/cef-transport/2015-pt-tm-0395-m

technical characteristics for freight and passenger traffic. This policy, besides being i) the cheapest, fastest and more efficient way of solving all the interoperability problems of the portuguese rail network, some mentioned in your letter to us (possibility to cater for freight trains up to 740 meters), ii) is the only way to satisfy the future needs of the Portuguese economy and avoid waste of resources in solutions that don't satisfy those needs. We also emphasize, that i) in the context of the construction of new lines, necessary to solve the interoperability problems you mentioned, and to increase capacity in the itineraries of the Atlantic Corridor, the extra cost of the UIC gauge is zero, as the cost of building those lines is the same in both gauges, either UIC or iberian, and ii) nobody asked to change the gauge of the existing iberian rail network.

With best regards

Luis Mira Amaral

Mário Lopes

Arménio Matias

Fernando Santos e Silva

Joaquim Polido

Luis Cabral da Silva

Alberto Grossinho

Mário Ribeiro

Eugénio Menezes de Sequeira

Fernando Mendes

Henrique Neto

Vitor Caldeirinha

João Luis Mota Campos

José Augusto Felício

João Duque
Carlos Sousa Oliveira
Rui Carrilho Gomes
António Gomes Correia
José António Ferreira de Barros
Luis Miguel Ribeiro
Fernando Castro
José Couto
António Miguel Batista Poças da Rosa
Rogério Hilário
Tomás Moreira
António Almeida Henriques
José Ribau Esteves
Ricardo Rio

Annex 1

Documents and declarations of members of the portuguese Government and rail authorities stating that Portugal does not need the UIC gauge

- 1 the most important document is PNI 2030
- (https://www.portugal.gov.pt/pt/gc21/comunicacao/documento?i=programa-nacional-de-investimentos-2030) investment Programme of the Portuguese Government in Infrastrutures up to 2030, that does not include building or modernising any railway line in UIC gauge. It is also planned to use polyvalent sleepers, but all lines are planned to be in iberian gauge. Therefore, trains of UIC gauge will not be able to circulate anywhere in Portugal in 2030.
- 2 In a public interview in October 2018, the former Minister of Infrastructures explained the railway policy of the Government, declaring that the difference of the rail gauge to the rest of Europe is a natural protection to Portuguese rail operators, defending the continuation of this situation. These declarations are available at the site https://www.dinheirovivo.pt/entrevistas/capacidade-de-transporte-aereo-em-lisboa-vai-duplicar/, after the 3rd video.
- 3 In April 2019, the Minister of Infrastructures declared in the portuguese parliament that the rail gauge issue is a fetish of those who don't want to debate rail issues. (http://webrails.tv/tv/?p=39958).
- 4 In February 2020, during a lunch with entrepreneurs, in an answer to Henrique Neto, one of the authors of this letter, the Minister of Infrastructures declared that "there is no problem with the rail gauge" (https://www.sabado.pt/portugal/detalhe/pedro-nuno-santos-serve-discurso-socialista-em-almoco-de-empresarios). Assuming the Minister has no intention of solving problems that don't exist for him, this means the government has no intention of introducing the UIC gauge in the Portuguese rail network.
- 5 In August 2020, Carlos Fernandes, deputy CEO of IP (the public company that manages the portuguese rail network) posted the following text in a social media network (see image below):

"The Mith of the RAIL GAUGE – the difference in the rail gauge is not and has never been an obstacle to rail freight and passenger traffic.

The booming freigth rail connection between China and Europe is another demonstration of this reality that some people are obstinated in not recognizing" (translation by the authors of this letter)

The comment to these statements is similar to the comment of the Minister of Infrastructures: if the difference of the rail gauge is not an obstacle, there is no reason to eliminate that difference.



Carlos Fernandes

Deputy CEO at Infraestruturas de Portugal

Visualizar perfil completo



O Mito da BITOLA - A diferença de bitola não é nem nunca foi um obstáculo as ligações ferroviárias de passageiros ou de mercadorias.

A pujante ligação ferroviária de mercadorias entre a China e a Europa é mais uma demonstração desta realidade que alguns teimam em não querer ver!



Não há pandemia que trave o comboio da China em Duisburgo - Plataforma Media

Annex 2

Starting and duration of the change of the rail gauge

The length of the portuguese rail network is about 2600 km, and will rise to 3300 km after the connection Elvas-Caia and a new Lisbon-Porto line are built. The length of the lines of the Atlantic Corridor is about 1100 km. Experiences done in Spain show that one team of 17 workers and the necessary machinery and equipment may change the rail gauge in about 1km/day in lines where previously polivalents sleepers have been installed. If another teams works on the switches, siding and other line equipments (expansion joints) at the same pace, the two teams would change the rail gauge in all the portuguese rail network in about 9 years, working all days or 14 years if they work only on normal working days. For the Atlantic Corridor only, these periods would be 3 and 2 years. These periods can be shortened if more teams and machinery are used in this task. However, the larger problem is that the circulation of trains has to be interrupted in each line when that line is under works, which is only possible when there is a suitable alternative, both for freight and passenger traffic. This is the case of double track lines with little traffic. But it is not the case of most lines of the Atlantic Corridor (according to current plans). That obviously would multiply costs and duration of works several times, or make it cheaper to built a new line on the same itinerary. As there is no plan on how the rail gauge will be changed, the Portuguese government does not know how long it will last or how much it will cost. But it will certainly last many years, it is impossible to do it quickly.

MIGRAÇÃO PARA A BITOLA EUROPEIA

CRITÉRIOS DE SELECÇÃO E IMPLEMENTAÇÃO.

OPÇÕES E PROGRAMAS.

A REALIDADE ESPANHOLA E EM PARTICULAR GALEGA

Miguel Rodríguez Bugarín

Prof. Dr. Ingeniero de Caminos, Canales y Puertos



TRAVIESAS POLIVALENTES

RENDIMIENTO

El equipo necesario para ejecutar un rendimiento de **1.080 m de cambio** es el siguiente:

- 1 Capataz.
- 16 Operarios
- 2 Posicionadoras.
- 4 Motoclavadoras
- 2 Motoclavadoras de reserva.
- 2 Tronzadoras
- 2 Clavadoras de impacto.
- Herramientas auxiliares.



Migração para a bitola europeia - critérios de selecção e implementação. Opções e programas, a realidade espanhola e em particular GalegaFerrocarriles Ordem dos Engenheiros – Porto, 2 – Jun - 2012

40

The Portuguese Government has declared to INEA that the lines of the Atlantic Corridor lines are built with polyvalent sleepers and therefore will prepared "for the installation of the UIC gauge in full synchrony with Spain". But it is important to note that for the Portuguese Government and IP, the process only starts after Spain finishes, as it is documented in the IP document entitled "Interoperability of the Portuguese rail network", of which the most relevant parts and respective translation (by the authors of this letter) are shown next.

Therefore, the main conclusion of the above is that the Portuguese Government never had the intention of completing the Core Network, according to the respective technical standards (EU Regulation 1315/2013), by 2030.



INTEROPERABILIDADE DA REDE FERROVIÁRIA NACIONAL



3. Estratégia para introdução da bitola europeia

A estratégia para introdução da bitola europeia na rede ferroviária portuguesa assenta na migração progressiva para a bitola europeia na rede existente em função da sua chegada à fronteira luso-espanhola (o designado principio de concordância da bitola nas fronteiras ferroviárias luso-espanholas).

Com efeito, Portugal tornar-se-ia uma "ilha ferroviária" caso a introdução da bitola europeia em Portugal se realizasse antecipadamente à sua chegada à fronteira.

Our translation:

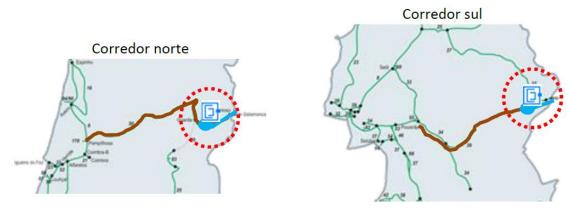
The strategy to introduce the UIC gauge in the Portuguese rail network is based in the progressive migration of to the UIC gauge after it is built up to the Portuguese/Spanish border (the so-called principle of concordant gauges)

Indeed, Portugal would become a "railway island" if the UIC gauge is introduced in Portugal before it arrives to the Portuguese border.



Fase 1:

Com a chegada da bitola europeia à fronteira, inicia-se a Fase 1 com a construção de estações de transição de bitola dotadas com aparelhos de mudança de bitola para comboios de passageiros e terminais ferro-ferro para a mudança de carga entre as duas bitolas para comboios de mercadorias. Estas zonas de transição deverão localizar-se provisoriamente próximo da fronteira para permitir migrar bitola no corredor.



Our translation:

Fase 1:

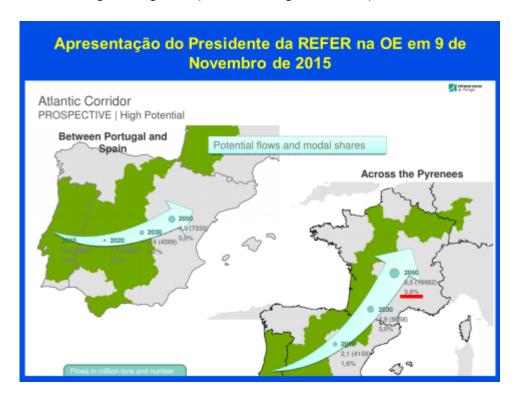
With the arrival of the UIC gauge to the border, Fase 1 starts with the construction of transition stations where gauge changers for passenger trains and rail-rail terminals to change freight between the two gauges for freight trains. These transition zones must be temporarily located near the border to allow the rail gauge migration in the corridor.

Studies to estimate demand of rail freight traffic in the International Corridor North

All the studies to estimate future freight transportation demand in the Atlantic Corridor, are based on the assumption that EU transport policies don't exist. These policies aim at transferring 50% of road transportation of goods in medium and long distances (>300km) to rail and maritime transport, being rail the structuring mode.

Below are transcribed parts of those studies, that show the International Corridor North (Aveiro-Salamanca line) is being planned to receive modal quotas of freight transportation far below the objectives of EU transportation policies. So, a large part of the investment plans to up-grade de Linha da Beira Alta, the single track line from Portugal to Salamanca, are a waste of resources, because the Linha da Beira Alta has no capacity to serve future needs. So we suggest that INEA promotes new studies to estimate demand in that Corridor, based on the assumption that EU transport policies will be enforced. This will lead to the conclusion that a double track line is necessary in this Corridor.

- Slide from a presentation by the Presidente of REFER (manager of the rail network at the time) in the Institution of Portuguese Engineers (Ordem dos Engenheiros, OE) in November 2015:



EUROPEAN REGULATION 913/2010 Rail Freight Corridor N°4 · Atlantic Corridor

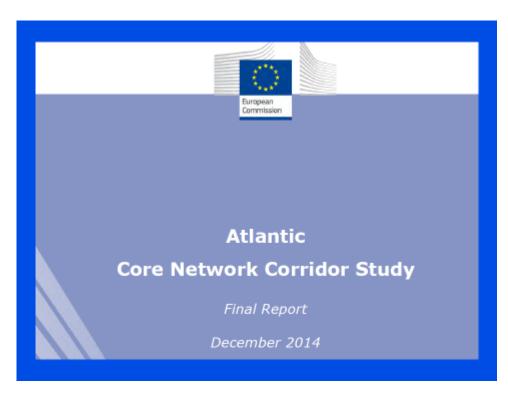
CORRIDOR INFORMATION DOCUMENT



The following table encompasses the annual flows, differentiated by market and by type of relation, in 2010 and with different prediction horizons:

	Flux de transport internationaux terrestres de marchandises sur le corridor n°4 (Kt)																
		Interne				Echange				Transit				Total			
		Ferroviaire			Ferroviaire				Ferroviaire				Ferroviaire				
		Conv. + TC	Auto. Ferro.	Part mod. Ferro.	Traf. Terrestre	Conv. +TC	Auto. Ferro.	Part mod. Ferro.	Traf. Terrestre	Conv. +TC	Auto. Ferro.	Part mod. Ferro.	Traf. Terrestre	Conv.+ TC	Auto. Ferro.	Part mod. Ferro.	Traf. Terrestre
Trans Total	2010	517		2,7%	19 172	3 883		5,3%	72 672	2 280		10,8%	21 039	6 680		5,9%	112 884
	2020	953	132	4,8%	22 686	7 471	1916	10,8%	87 308	3 781	36	14,6%	26 183	12 204	2 084	10,5%	136 177
	2030	1953	1 139	9,9%	31 090	11 686	3 547	13,2%	115 571	5 648	253	17,2%	34 265	19 288	4 939	13,4%	180 926
	្ត 2010	303		3,3%	9 255	1 152		3,4%	34 251	508		5,6%	9 095	1963		3,7%	52 601
	2010 2020 2020	631	132	6,4%	12 020	2.929	1916	11,6%	41 647	830	36	7,7%	11 241	4 391	2 084	10,0%	64 908
	≧ 2030	1 101	1 139	13,8%	16 192	4 856	3 547	15,7%	53 598	1 103	253	9,8%	13 904	7 060	4 939	14,3%	83 694
Sud	2010	213		2,2%	9 917	580		2,9%	19 657	0		0,0%	219	793		2,7%	29 792
	2020	321		3,0%	10 666	834		3,9%	21 345	1		0,6%	240	1 157		3,6%	32 252
	2030	853		5,7%	14 898	1501		5,0%	29 791	5		1,5%	335	2 359		5,2%	45 024
Nord	2010	s'arrête en France, il n'y a pas de trafic international interne au				2 152		11,5%	18 765	1772		15,1%	11 725	3 924		12,9%	30 490
	2020					3 708	-	15,3%	24 315	2 949		20,1%	14 702	6 657		17,1%	39 017
	2030					5 329		16,6%	32 182	4 540		22,7%	20 026	9 869		18,9%	52 208

Market Studies for the Atlantic Corridor, taken from the following Report:



Atlantic Corridor, Final Report

2030, the RFC4 study estimated that total corridor volumes would rise to 475 million tonnes, with road (55%), sea (41%) and rail (4%). Thus all modes of transport are expected to grow at similar levels.

Summary of Forecasts

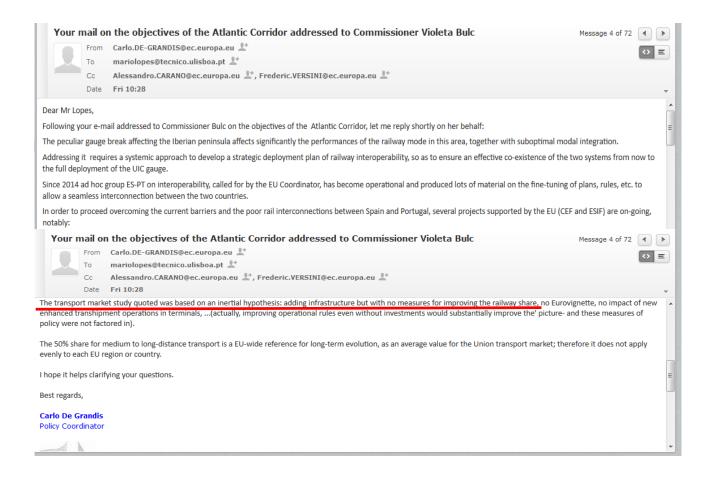
Based on the above tables, with the corridor defined in terms of tonnages from selected O/D combinations, the shares of cross-border traffic per mode are as follows. This way it is possible to see the role played by maritime transport isolating only the flows where there is competition between land and sea modes.

The first table (below) shows the shares by mode for the cross-border O/Ds. The second includes the (larger) volumes of domestic traffic. Both tables exclude any flows with origins or destinations outside the range of countries selected. Those are mainly flows to or from Eastern Europe, Scandinavia, the Eastern Mediterranean, North Africa, and deep sea locations.

Table 48: Modal Share, according to cross-border tonnage (000s)

	2010	2010 Share	2050 (Scenario)	2050 Share
Rail	19 805	4.9%	41 048	6.0%
Road	233 004	57.9%	400 895	59.0%
IWT	28 306	7.0%	43 273	6.4%
Sea	121 334	30.1%	194 286	28.6%
Total	402 450	100.0%	679 502	100.0%

Following a question send to the former Commissioner Violeta Bulc, the answers confirm the obvious: the studies to estimate traffic demand in the Atlantic Corridor don't consider measures to improve the railway share to achieve the objectives of EU transport policies.



Annex 4

Media reaction to the Commissioner letter

Next the main media reactions to your letter are presented. There is distortion of the contents of your answer, misleading the portuguese public opinion, which is not your direct responsibility, but that was possible due to the ambiguity and confusions of your letter. That is why we ask for clear communication by the EU Commission.

1 - https://www.dinheirovivo.pt/empresas/portugal-nao-precisa-de-mudar-de-bitola-segundo-bruxelas/



Portugal não precisa de mudar de bitola, segundo Bruxelas

TRANSPORTES

Portugal não precisa de mudar de bitola, segundo Bruxelas



Our translation of the headlines:

"Transports.

Portugal does not need to change the rail gauge, according to Brussels"

2 – https://www.publico.pt/2020/09/08/economia/noticia/bruxelas-nao-necessario-mudar-bitola-peninsula-iberica-1930897



Our translation:

"Trains

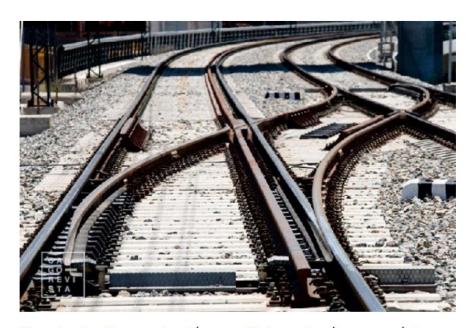
Brussels says it is not necessary to change the rail gauge in the Iberian Peninsula (headlines, bold text)

In the answer to those who defend the change of the rail gauge, the European Commission says that, for rail interoperability, the electrification, the capacity of lines for 740m long trains and the elimination of administrative barriers are more important than the rail gauge"

3 – https://revistacargo.pt/comissao-europeia-da-veredicto-nao-e-necessario-mudar-a-bitola-na-peninsula-iberica/



Home / Terrestre / Comissão Europeia dá veredicto: não é necessário mudar a bitola na Península Ibéric



Comissão Europeia dá veredicto: não é necessário mudar a bitola na Península Ibérica

TERRESTRE — 9 Setembro, 2020 Decembro Comentários fechados 39

Our translation:

"Veredict of the European Commission: it is not necessary to change de rail gauge in the Iberian peninsula"