

Amersfoort - Netherlands, 7 May 2025

To: DG MOVE, Units B.1 "Transport Networks" and C.3 "Single European Rail Area"

**Answer on the Call for Evidence for the Initiative of the EU Commission on 'Connecting Europe Through High-Speed Rail' Ares(2025)2943772 - 10/04/2025**

Rover welcomes the Commission's initiative 'Connecting Europe through High Speed Rail' as an urgent and necessary step to implement the Flagship Pillar 2 action in the Commission recent 'Competitive Compass for the EU': a High Speed Rail Plan (2025).

Rover very much support the three bullets on the targets in this Call:

- Coordinate the planning, financing, and implementation of interoperable infrastructure
- Facilitate a citizen-centred, attractive and affordable rail offer, based on a competitive profitable business model for operators
- Strengthen the competitiveness of the European rail supply industry

These targets fits perfectly within the present geopolitical situation. Strengthening the competitiveness is in line with the Draghi and Letta reports as well.

Rover welcomes the continuity in the strategic goals of the Commission and the EU Parliament to double international train connections before 2030; also as part of the EU decarbonization goals.

These strategic goals are in line with passengers needs for international trains: reliability, frequency, booking, ticketing and pricing.

However, since setting these goals in 2019, and reconfirming them in 2021 and 2025, plane and train passengers experience none or just small progress. And despite this standstill there is a fast growing demand by passengers for more and better international trains: young people, business people, tourists.

So, where the strategic goals are perfect we really hope that the Commission at the start of its tenure will announce a strategy to implement them, especially the goals that you say you want to reach in 2030. A goal that is all the more urgent where the EU in the present geopolitical situation need all the more seamless international train connections for Military Mobility as soon as possible.

*Rover.  
Van reizigers,  
voor reizigers.*

From the passengers perspective we propose 3 essential suggestions for this implementation strategy:

1. Create a funding for the billions of Euro's, necessary for doubling international trains before 2030: infrastructure, rolling stock, harmonization of national regulation booking and ticketing;
2. Prioritize action on those international train connections with the highest number of inner-Europe Flights and where the implementation is relatively easy.
3. Start an industrial initiative to fast track ordering and building the rolling stock necessary for doubling international train travelling already by 2030.

To make these 3 suggestions work it is essential that the Commission create a synergy in its priority to decarbonize transport through

- a) a robust modal shift from short and middle long flights in the EU to international trains;
- b) to tax flights as the most polluting way of passengers transport and
- c) use the proceeds of a flight tax or levy to fund and coordinate the implementation and use of interoperable international rail connections.

Of course it is possible to implement a flat tax on flights or CO2 emissions and use the proceedings for funding the necessary modal shift from planes to trains to offer a sustainable alternative for travellers in Europe.

A research by the Dutch engineers/consultants of CE Delft shows that implementation of a Frequent Flying Levy will result in a practical solution for the funding of a EU coordinated investment boost in all the EU member states: [https://cedelft.eu/wp-content/uploads/sites/2/2024/10/CE\\_Delft\\_230304\\_European\\_Frequent\\_Flying\\_Levy\\_Def.pdf](https://cedelft.eu/wp-content/uploads/sites/2/2024/10/CE_Delft_230304_European_Frequent_Flying_Levy_Def.pdf)

An important difference with a flat tax on every flight, the levy will mainly be paid by frequent flyers or influence these 25% of passengers who make 75% of all flights making less flights. Once a year passengers are exempted, enabling affordable holidays for the many and offering them a sustainable alternative in the near future. The Frequent Flyer Levy reduces not only 25% of flights taken and 20% of the CO2 emissions but also raises 75 billion Euro's on a yearly base. These 75 billion Euro can be used for a fast and coordinated execution by EU and member states of the necessary investments, standardization and regulation for the already decided doubling of international train connections by 2030.

For the levy or flight tax It is essential that all members states implement the levy or tax with the same tariff to secure a level playing field. It is also essential that the commission uses its instruments for coordinating priorities to guarantee seamless connections for public transport for passengers to all EU member states: not only trains, but also ferry's, as in Greece or to Malta and Ireland, or buses.

From the passengers perspective, doubling international train connections comprises more than only focusing on High Speed Rail. Of course speed is nice, but for a successful modal shift from planes to trains the most essential improvements are reliability, frequency, booking/ticketing and pricing. Night trains, for instance are not that fast; but businesspeople, youngsters and tourists alike need a night sleep and do not count that as travel time. What they want is to be on their destination on the right time after a comfortable, reliable and sustainable journey.

From a passengers perspective it is of the essence that the Initiative comprises first and last mile multi modal connectivity solutions that are crucial for the accessibility and usability of the international train network, especially in between border regions. Connecting rail to airports is also essential for sustainable multimodal solutions for intercontinental traveling.

The Frequent Flying Levy or a flight tax, both as dedicated funding for the modal shift from planes to trains, can become part of the Commission's ambition for 'revamping its external action financing, to make it more impactful and targeted for partners and more aligned with the Commission's strategic interests'.

Replacing short and medium distance flights in Europe by international trains or doubling international train connections by 2030 make ordering and building of a vast amount of rolling stock very urgent. To illustrate the scale of investment required for a considerable modal shift from flights to trains, the recent TU Delft master thesis by David Dietzenbacher, a young Rover member, estimates additional rolling stock needs in a hypothetical scenario where most intra-European flights are substituted with trains. If two in three flight passengers would shift to trains, mostly on short- and medium-distance air routes, many hundreds of extra trainsets or several thousands of extra carriages would be required, both for daytime trains and for night trains.

<https://repository.tudelft.nl/record/uuid:ed26236d-ec8b-4a47-8e06-927b466793d9>

Rover suggests the Commission to initiate an industrial initiative with the European rolling stock companies to standardize and innovate faster production of large amounts of rolling stock and to create with the European Investment bank and possibly private capital a new financial instrument for ordering and leasing of new trains. This is essential for the new entrants enterprises who, in the present regulatory landscape can get no long year guarantee for international trainpaths. Fast producing of a vast amount of rolling stock puts also pressure on the traditional train companies to start exploiting the already available capacity of international rail connections.

As the Dutch consumer organization for sustainable travellers Rover gladly offer to work together with the Commission on delivering the 2030 goals, by organizing support in our country, and with our government.

It would be very helpful for integrating the passengers experience in the formulation and implementation of the new High Speed Train strategy in all EU countries when the Commission initiate supporting the European Passengers Federation to strengthen the voice of passengers in all EU member states.

Yours sincerely,

Freek Bos  
Director

*Reizigersvereniging Rover is 'The Voice' of public transport passengers in The Netherlands. Rover promotes comfortable, affordable, reliable and high-frequent public transport as an attractive and sustainable alternative for cars and planes. Rover has a special right to advice on all matters of public transport, guaranteed in the Dutch Law on public Transport (WP 2000)*