



Warsaw, July 6th, 2020

Position Paper

of Polish rail industry and business organizations regarding

Proposal for a

**REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL
establishing measures for a sustainable rail market in view of the COVID-19 pandemic**

The Polish market organizations promoting railway transport development:

- Railway Business Forum
- ProKolej Foundation
- Land Transport Chamber of Commerce
- “Forum for responsible development - Luxtorpeda 2.0” business cluster
- Federation of Independent Rail Operators (ZNPK)
- Federation of Regional Passenger Operators (ZSPK)

strongly support the proposal for a *Regulation by the European Commission establishing measures for a sustainable rail market in view of the COVID-19 pandemic*, aimed at protecting



the railway market – deeply affected by the negative consequences of the pandemic – by introducing mechanisms reducing the cost of access to the railway infrastructure.

The problem of access to infrastructure cost being too high has been highlighted by the market players for years as one of the most significant hurdles hampering competition with road transport:

1. The cost of access to railway infrastructure in the case of an intermodal train running from Gdańsk to Katowice is on average two times higher than the cost of tolled roads for trucks transporting the same load.
2. According to the official statistics, between 2005 and 2018 the total load of transported goods increased by 1,1 billion tonnes, out of which 98% was captured by road transport. In 2017 alone, road transport increased by an additional 200 million tonnes of goods which equals 90% of the entire volume of goods transported by railways in 2016.

Since the begin of the COVID-19 crisis the problems of railway sector, stemming from unbalanced modal competition conditions, have become even deeper. Several weeks of lockdown devastated the demand for railway service in certain industry related sectors and for some operators the decrease of traffic reached 70%.

As representatives of the railway market in Poland, we would like to stress that any measures intended for securing operation of rail operators and other market players are of vital importance. Stability, in particular the financial stability of the sector, is crucial for the sake of railways role within the pro-environmental strategies, such as the “European Green Deal”.

Having the above in mind, all the initiatives leading to the reduction of infrastructure costs are welcomed. With satisfaction we acknowledge the measures taken by the national infrastructure manager PKP Polskie Linie Kolejowe S.A. such as waiving of reservation fee and we contentedly note the declaration of in-depth analysis of possible decrease of track access charges.



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In our view the European Commission's initiative is in line with market needs we were discussing before with the Polish Ministry of Infrastructure. We believe that the measures and methods proposed within the Regulation should be supported, especially as regards the possibility to reduce, waive or defer the payment of the charges for the minimum access package and for access to infrastructure connecting service facilities or to reassess the ability of the market segments to bear mark-ups.

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