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**COMMISSION STAFF WORKING DOCUMENT**  
**STAKEHOLDER CONSULTATION - SYNOPSIS REPORT**

*Accompanying the document*

**Communication from the Commission to the European Parliament, the Council, the  
European Economic and Social Committee, and the Committee of the Regions**

**Connecting Europe through high-speed rail**

{COM(2025) 903 final} - {SWD(2025) 960 final}

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# 1. Introduction

This staff working document accompanies the Communication from the European Commission on Connecting Europe through high-speed rail ('HSR Communication'). It contains information on the overall stakeholder consultation activities conducted in the preparatory phase of the Communication.

Stakeholders were consulted in line with the Better Regulation framework<sup>1</sup>, ensuring a transparent, meaningful and proportionate approach to consultation. This enabled the Commission to: (i) get useful feedback from a wide range of stakeholders; (ii) take the views of these stakeholders into account; and (iii) reflect these stakeholders' messages in the HSR Communication where relevant.

The HSR Communication focuses on the challenges and opportunities related to improving high-speed rail connectivity. The feedback received from stakeholders informed the identified issues and the actions to address them set out in the Communication to reach its three overarching objectives:

1. coordinated planning, financing and deployment of interoperable rail infrastructure;
2. an attractive and affordable passenger-centred rail service offer, based on a competitive and profitable business model for operators;
3. a competitive and innovative EU rail supply industry delivering interoperable rail modernisation with standardised European equipment.

Before presenting the dedicated consultation activities carried out to prepare the HSR Communication, it is worth mentioning a number of past initiatives that involved stakeholder consultations and that have been considered in the Communication.

An extensive case study on high-speed rail and the European long-distance passenger network was conducted in the framework of the 2021 evaluation of Regulation (EU) 1315/2013 on the development of the trans-European transport network (the TEN-T Regulation)<sup>2</sup>. The results of that study were taken into account in the Regulation's revision, which was adopted in 2024<sup>3</sup>. The study included an accessibility and connectivity analysis and considered the costs, benefits externalities and network effects of high-speed rail.

Moreover, in the framework of the reporting obligation set out in Directive 2012/34/EU establishing a single European rail area<sup>4</sup>, the Commission consulted the regulatory bodies in Member States that have an established high-speed system on the development of this market.

An extensive stakeholder consultation was also carried out in the framework of the European Parliament Pilot Project (study on Long-distance cross-border passenger rail services) that served as input to the Communication from the Commission to the European Parliament and the Council: Action plan to boost long-distance and cross-border passenger rail<sup>5</sup>.

Building on the information already received from these initiatives, the Commission requested stakeholder feedback via the following consultation channels:

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<sup>1</sup> [Better regulation - European Commission](#)

<sup>2</sup> SWD(2021) 117 final.

<sup>3</sup> Regulation (EU) 2024/1679.

<sup>4</sup> Article 63(1).

<sup>5</sup> COM(2021) 810.

- a call for evidence;
- the Single European Rail Area Forum (SERAF);
- an implementation dialogue on high-speed rail;
- the Economic Coordination Council (CCE)

Chapter 2 summarises the input received from these consultations.

## 2. Summary of stakeholder feedback

### 2.1 Call for evidence

The main tool for public stakeholder engagement was a [call for evidence](#), which was published on 10 April 2025 and open for feedback until 8 May 2025 on the Commission’s ‘Have your say’ portal. The call for evidence was available in all EU languages, and contributions could be made in all EU languages. All stakeholders were invited to provide views on the political context, the problems the HSR Communication aims to tackle, the need for EU action, its objectives and likely impacts.

#### 2.1.1 Breakdown of responses

The call for evidence received 81 responses in total (see Table 1). Various stakeholders provided feedback on the initiative, with most input coming from EU citizens, companies/businesses, business associations, public authorities and NGOs.

**Table 1. Breakdown of responses to the call for evidence by category**

Category	Number of respondents
EU citizens	22
Company/business	13
Business association	11
Public authority	10
Non-governmental organisation (NGO)	9
Trade union	5
Consumer organisation	3
Environmental organisation	1
Academic/ research institution	1
Non-EU citizens	2
Other	4

The most well-represented Member States were Belgium (19.75%)<sup>6</sup>, France (18.52%), the Netherlands (8.64%), Italy (7.41%) and Germany (7.41%), which together provided more than 60% of all responses. No responses were received from Bulgaria, Croatia, Hungary, Slovenia, Cyprus, Greece or Portugal. There were also responses from non-EU countries: the United Kingdom, Switzerland and Puerto Rico (one from each country). Table 2 provides a detailed breakdown by country of respondent.

**Table 2: Breakdown of responses to the call for evidence by country**

<b>Country of respondent</b>	<b>Number of respondents</b>
Belgium	16
France	15
The Netherlands	7
Italy	6
Germany	6
Romania	4
Austria	4
Sweden	3
Spain	3
Czechia	3
Slovakia	2
Poland	2
Denmark	2
Latvia	1
Lithuania	1
Ireland	1
Finland	1
Estonia	1
United Kingdom	1
Switzerland	1
Puerto Rico	1

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<sup>6</sup> Many of these contributions came from EU-level umbrella associations located in Belgium.

The call for evidence results reveals widespread support for the initiative, with many stakeholders emphasising the importance of high-speed rail in achieving the EU's climate objectives and increasing its competitiveness.

Many stakeholders called for the accelerated delivery of the TEN-T network, in line with the parameters agreed in 2024 and the respective timelines, to achieve seamless cross-border connectivity and address the EU's east-west disparity. They also highlighted the need for a dedicated funding strategy and innovative financing mechanisms to support high-speed rail.

The need for an inclusive approach to high-speed rail and the importance of supporting new entrants was highlighted, as well as the need for interoperability to overcome fragmentation in the European high-speed rail network. The need for accessible financing for rolling stock, coordinated capacity planning and allocation, and a level playing field on VAT compared to air travel was also mentioned. Respondents also underlined the importance of deploying the European Rail Traffic Management System and standardising high-speed rolling stock to facilitate cross-border operations.

The feedback underscored the significance of improving multimodality and addressing first- and last-mile connectivity challenges to improve the accessibility and usability of the high-speed rail network. Additionally, many contributions pointed to the need for simplified and seamless ticketing systems and better connectivity between urban centres.

Placing passengers at the centre of service provision was mentioned in several contributions. To boost the competitiveness of high-speed rail and make it an attractive alternative to other modes of transport, respondents stressed that certain factors need to be taken into account, including affordability, frequency of services (and predictability, for example, of maintenance works), easy access to information, ticketing conditions, and reliability of services.

Addressing negative externalities (e.g. linked to noise) and integrating social considerations (e.g. labour and safety standards) into the high-speed rail agenda were also mentioned.

Overall, the call for evidence feedback reflects a strong consensus on the potential benefits of high-speed rail in Europe, while also highlighting the challenges and considerations that must be addressed to ensure successful implementation. The feedback emphasises the need for coordinated planning, investment and regulatory frameworks to create a truly interconnected and sustainable European high-speed rail network.

All contributions to the call for evidence can be read on the '[Have your say](#)' website.

## **2.2 Consultation of the Single European Railway Area Forum (SERAF)**

SERAF is an expert group that supports the Commission in the further implementation of Directive [2012/34/EU](#) establishing a single European rail area and the establishment of the Single European railway area more broadly. SERAF brings together all key stakeholders from the European railway system (infrastructure managers, railway undertakings, national ministries and enforcement bodies, NGOs, the rail supply industry) so that they can discuss and exchange views on policy issues related to rail market access.

Given the comprehensive coverage of SERAF, one of the main targeted stakeholder consultation activities was conducted via this platform. A plenary session, fully dedicated to

the HSR Communication, was organised on 9 April 2025 to gather input from the rail sector. The following bodies were represented at the plenary meeting:

- national ministries from 15 Member States and Switzerland;
- independent regulatory bodies from 15 Member States;
- infrastructure managers from 6 Member States, Norway, and Rail Net Europe ([RNE](#));
- 9 rail operators and the Community of European railway and infrastructure companies [CER](#);
- the European rail supply industry association ([UNIFE](#)) and [Alstom](#);
- environmental associations ([GermanWatch](#), Transport and Environment ([T&E](#));
- industry associations (Association of European rail rolling stock lessors ([AERRL](#)), International rail transport committee ([CIT](#)), International union for road-rail combined transport ([UIRR](#)), International union for public transport ([UITP](#)));
- the European passenger association ([EPF](#));
- European transport workers' federation ([ETF](#)));
- the ticketing sector ([Trainline](#));
- the network of major European cities ([Eurocities](#));
- the European Union Agency for Railways ([ERA](#));
- Europe's Rail Joint Undertaking ([EU-RAIL](#))

The main contributions from this consultation event on the main topics of the HSR Communication are summarised below.

## 2.2.1 Coordinated planning

Stakeholders emphasised the critical need for **coordinated planning** to accelerate the development of cross-border high-speed rail (HSR) infrastructure. Infrastructure managers (IMs) highlighted the necessity of integrating low and high-speed networks, as well as freight and passenger transport. Securing **financial resources** for large-scale infrastructure projects was a major concern for many stakeholders. IMs acknowledged the importance of exploring innovative financing models, such as public-private partnerships, to attract private investment. At the same time, IMs and regulatory bodies highlighted the need to carefully analyse the potential impact of such models on track access charges, which could be higher if private investors' profit expectations have to be met. The significance of preserving the ability to support cross-border projects with EU funding in the EU's next long-term budget (the multiannual financial framework) was underscored by various stakeholders. EU funding should be used for sections that are important for EU/cross-border travel.

Stakeholders called for **effective collaboration** between national authorities, IMs and railway undertakings (RUs) to ensure smooth project implementation. Some regulatory bodies (RBs) raised questions about harmonising planning standards across Member States, highlighting the need for a unified approach to planning and financing cross-border HSR infrastructure.

Several participants highlighted the need for **harmonising technical standards and regulations** to ensure interoperability. IMs emphasised the importance of completing the trans-European transport network (TEN-T) and setting standards to facilitate cross-border operations. Environmentally engaged stakeholders stressed the importance of reducing the environmental impact of new HSR infrastructure by incorporating low carbon construction

materials and promoting sustainable solutions. They emphasised the need for coordinated planning to tackle high costs and the environmental impacts associated with HSR projects.

IMs and RBs identified several **barriers to the timely implementation of HSR projects**, including high costs, lengthy permitting processes and bureaucratic obstacles. They suggested actions to improve coordination, such as simplifying and accelerating permitting procedures and reducing administrative burdens.

Stakeholders suggested developing **joint strategic plans and investment programmes for cross-border lines**. Conducting joint feasibility studies and environmental impact assessments and ensuring the prioritisation of cross-border projects in national long-term infrastructure development plans were recommended actions to improve coordination.

Increasing the **availability and improving the coordination of EU funding instruments** was also emphasised by stakeholders. They suggested exploring innovative financing models and creating mechanisms for a fair and efficient allocation of costs and benefits among participating countries. Better financial coordination was deemed essential to support the timely implementation of HSR projects. One consumer organisation deemed a doubling of the funds for the Connecting Europe Facility necessary.

Fostering **stronger collaboration and dialogue** among all stakeholders was highlighted as a key aspect of coordinated planning for rail services. Ensuring transparency and public consultation throughout the planning and implementation processes was recommended to gain public support and address concerns from various stakeholders, including local communities and interest groups.

Stakeholders also emphasised the importance of **addressing capacity bottlenecks** and ensuring seamless connectivity across the HSR network.

Accelerating the **adoption and enforcement of common technical specifications for interoperability** for infrastructure, signalling and rail vehicles was a key recommendation from stakeholders. They called for harmonising safety and operational rules to ensure seamless cross-border operations.

Promoting the **deployment of common and interoperable digital solutions**, such as the European Rail Traffic Management System and other intelligent transport systems, was recommended to improve connectivity and reduce costs and timelines. Encouraging innovation in the design of integrated infrastructure, its construction and operation was deemed crucial to improve efficiency and sustainability.

Improving the **monitoring of progress on cross-border projects and ensuring that Member States meet their obligations under the TEN-T Regulation** was emphasised by stakeholders. They called for the European Commission to play a stronger role in overseeing and enforcing the timely implementation of the HSR network.

## **2.2.2 An attractive and affordable passenger-centred rail offer**

Stakeholders emphasised the significance of **efficient capacity allocation** to ensure the success of high-speed rail services. They suggested pre-planning capacity and improving the planning of temporary capacity restrictions to improve business predictability and customer experience,



in line with the proposed Regulation on rail capacity<sup>7</sup>. Participants drew attention to the fact that operators often need long-term assurances of capacity to secure financing for new rolling stock, and vice-versa.

Varying and **high track access charges (TACs) levied by national IMs** were identified as a challenge, particularly for new entrants. Ensuring fair and proportionate TACs, including possible discounts for new entrants, was highlighted as essential to maintaining the competitiveness of rail with other modes of transport.

Participants mentioned **difficulties in acquiring rolling stock**, in particular the high price of new rolling stock, difficulties in securing financing (in particular for new entrants) and long lead times.

**Availability of maintenance and service facilities** was reported as a barrier for new entrants.

Stakeholders emphasised the need to **improve service quality, reliability, and passenger comfort** to make rail travel more attractive, including by investing in new rolling stock. Many stressed the importance of **simplifying the ticketing process** to attract more passengers. Integrated ticketing systems and real-time passenger information across different operators and countries were recommended to facilitate seamless cross-border journeys, as well as improved passenger rights, for example, by providing assistance with rerouting after a disruption.

Participants suggested **improving multimodal connectivity** to improve the overall travel experience and promote a modal shift towards rail. This could be achieved through better rail connections to airports and other modes of transport. Development of HSR should not happen at the expense of conventional rail. IMs highlighted the importance of connecting long-distance rail services to conventional rail and other modes of transport to benefit both cities and regions. Finally, operators mentioned the need to provide financial support to rail services that are requested to serve destinations that are not economically viable.

Several participants stressed the need to **reduce the prices of train tickets to make rail travel more attractive and accessible**. RBs mentioned the importance of fair and proportionate track access charges to ensure competitiveness with other modes of transport. Stakeholders, including industry and advocacy groups, suggested exploring measures such as VAT exemptions for EU cross-border train journeys to improve affordability.

Stakeholders highlighted the importance of **maintaining and renewing existing lines** to ensure the reliability and safety of rail services. They also stressed that the HSR plan should consider the need for skilled labour.

### 2.2.3 Interoperability

Several stakeholders emphasised the need for improving the interoperability of railway infrastructure and rolling stock across the EU. IMs, RUs and industry representatives highlighted the importance of **deploying modern versions of the European Rail Traffic Management System (ERTMS)**. They stressed the need for harmonising the requirements for integrated infrastructure, the ERTMS and vehicles at EU-level and removing national rules to ensure smooth train operations across networks. They called for increased monitoring and

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<sup>7</sup> COM(2023)443.

inspection capacity in the Commission or the European Union Agency for Railways to implement the ERTMS roll-out efficiently. Moreover, they proposed optimising authorisation processes and, based on further EU-level harmonisation, stable technical specifications to allow for long-term planning and production.

RBs stressed the need for a **unified certification process** for train drivers across the EU. Many stakeholders emphasised the importance of delivering stable technical specifications that do not require add-ons in national law. They called for the removal of redundant national rules to ensure interoperability and reduce project costs and investment risks.

Participants advocated for the **standardisation of rolling stock**, which would boost the leasing market for high-speed trains and achieve economies of scale. They suggested promoting the development of common European standards for rolling stock, infrastructure components and signalling systems.

Industry representatives called for increased **public and private investment in research, development and innovation** in the European rail supply industry. They highlighted the need for collaboration between research institutions, universities and rail supply companies to develop innovative technologies. Stakeholders suggested promoting the uptake of digital solutions, such as artificial intelligence, the Internet of Things and big data analytics, to improve interoperability and efficiency.

RBs highlighted ongoing efforts to **optimise certification and authorisation processes**, supported by stable technical specifications, and to improve the availability of compliance assessors. They called for optimising testing and re-authorisation processes for refurbishment and retrofitting to extend the life of rail assets and boost the rail sector's competitiveness.

Industry representatives suggested implementing **public procurement practices that emphasise quality, innovation, sustainability and life-cycle costs**. They called for fair competition and transparency in tender processes to support the development of the European high-speed rail network.

### **2.3. Implementation Dialogue on High-Speed Rail chaired by the Commissioner for Sustainable Transport and Tourism, Apostolos Tzitzikostas**

The [Implementation Dialogue on High-Speed Rail](#) (HSR) was held on 15 April 2025. It was attended by 45 high-level stakeholders from rail operators, infrastructure managers, passenger organisations, cities and civil society, trade unions, private investors, rolling stock leasing companies, construction and engineering companies, the European Investment Bank (EIB), ERA and the EU Rail Joint Undertaking. The exchanges covered implementing high-speed rail from different angles, including planning, construction, financing, rail operations and passenger experience.

Participants expressed broad support for the Commission's preparatory work on the plan to connect Europe by high-speed rail and emphasised the need for balance: the development of HSR should not disadvantage conventional rail services, which are important for regional

connectivity. At the same time, some participants consider ‘real HSR’ (speeds over 250 km/h) to be important for commercially viable long-distance rail services.

The main overarching messages described below emerged from the Dialogue.

### **2.3.1 Infrastructure and investment needs**

- Need to overcome capacity bottlenecks with the help of the Regulation on rail capacity proposed in 2023 and new infrastructure investments.
- Importance of stable long-term funding and continued EU-level funding for cross-border infrastructure projects.
- Encouragement to explore involving possible private finance using various instruments (EU guarantees, blending instruments, green bonds, regulated asset base model<sup>8</sup>).

### **2.3.2 Construction and cost challenges**

- Reducing permitting delays and addressing labour shortages to speed up delivery of projects.
- Economies of scale and increased harmonisation of rail system components suggested to reduce infrastructure costs.
- Integration of sustainability criteria and innovation in design phases.

### **2.3.3 Market competition and entry barriers**

- Need to reduce barriers for new entrant operators as more competition will improve affordability and customer choice. Issues to address include access to rolling stock, interoperability and track access charges.
- Simplification of vehicle authorisations for cross-border train operations.
- Better coordination of ERTMS deployment to strengthen interoperability and safety.
- Trade unions cautioned against more market opening, which they felt would lead to fragmentation and reduced reliability of services as well as lower labour standards. The upcoming review of the Train Drivers Directive<sup>9</sup> could be a good way to improve training standards and make the profession more attractive to young people.

### **2.3.4 Passenger experience and rights**

- Improved ticketing systems suggested to broaden accessibility and improve passenger experience.
- Reviewing passenger rights to ensure protection against travel disruptions or delays.
- Calls for a level playing field across transport modes, including the suggestion of zero VAT on train tickets and better internalisation of external costs through energy taxation.

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<sup>8</sup> Regulated asset base model (or RAB) is a financing model for regulated infrastructure projects, providing support for their design, construction, commissioning, and operation. In this model, private or corporatised state-owned companies act as the infrastructure manager: they own, invest in and operate infrastructure assets according to the provisions of an agreement with the regulator. The infrastructure manager receives charges revenue from users and/or subsidies to fund its operations and recoup investment costs as decided with the regulator

<sup>9</sup> [Train drivers – improved EU certification scheme](#).

### **2.3.5 Supply industry and innovation**

- Long-term predictability of orders to allow the rail supply industry to take investment decisions.
- Reduction of unnecessary national technical and operational rules.
- Encouragement for sustained investment in rail research and development.
- Reform of public procurement rules to emphasise best value, not just lower costs.

## **2.4 Economic Coordination Council (CCE)**

The CCE is an advisory board created in 2002 under the patronage of Member States. The board's initial role was to advise national governments on the basis of non-representation of interests on sectoral economic issues dealt with by the **European Council** and/or included in the biannual programmes of successive presidencies.

The CCE monitors the development of EU policies in areas such as financial services, climate and energy, environment, transport and infrastructure, competitiveness and industrial policy, and digitalisation. Since its creation, the CCE has been asked to draft reports and contributions for both the European institutions and national governments. The Commission asked the CCE to provide preparatory notes as input to the HSR Communication. The preparatory notes were drafted with the contributions of 20 experts from leading European companies in the railway sector, included infrastructure managers, HSR operators (both incumbents and new entrants), railway manufacturers and technology providers, and from the financial sector, including merchant banks, national promotional banks, and institutional investors (both private equity funds and pension funds). A working meeting to discuss the findings took place on 6 May 2025 between the group of experts and Commission representatives.

The notes focus on the strategic, regulatory and financial enablers needed to accelerate the deployment of HSR in the EU, offering structured assessments and recommendations across infrastructure, rolling stock, market design, financing and service integration. They highlight the importance of:

- cross-border connectivity, infrastructure completion and operational alignment;
- interoperability, especially ERTMS deployment and rolling stock compatibility;
- EU funding mechanisms as enablers to realise high-speed rail projects;
- service design, including competition, digital ticketing, multimodal hubs and air-rail links;
- framework agreements to unlock private investment and market entry.