
URBAN NODES ALLIANCE

AMENDMENTS TO THE PROPOSED CEF III REGULATION

This document is a call for action from the side of the Urban Nodes Alliance, the cooperation between leading networks and Territorial Groupings that are close to the reality of Urban Nodes in the TEN-T: EMTA, ERRIN, ETSC, EUROCITIES, ICLEI, Interregional Alliance for the Rhine-Alpine Corridor EGTC, POLIS, Scandria Alliance and UITP. The Urban Nodes Alliance is supported by the Île-de-France European office.

The **Connecting Europe Facility (CEF)** should continue to support large-scale infrastructure while reinstating **Urban Nodes as a clear priority**, acknowledging their essential role in delivering EU added value along the TEN-T network and securing transport efficiency and sustainability across the EU, as highlighted and reinforced by the TEN-T Regulation 2024/1679.

1. Urban Nodes at the core of the TEN-T Framework

Urban Nodes have been identified as key areas for the development and functioning of the major transport infrastructures identified in the TEN-T regulation. They represent the critical interface between long-distance transport corridors and local and regional mobility systems, ensuring seamless connectivity for passengers and freight while addressing congestion, emissions, and accessibility challenges.

As per the TEN-T Regulation: ‘Urban Nodes play an important role on the trans-European transport network as starting point or final destination (‘last mile’) for passengers and freight moving on the trans-European transport network and are points of transfer within or between different transport modes. It should be ensured that capacity bottlenecks and insufficient network connectivity within Urban Nodes no longer hamper multimodality along the Trans-European Transport Network. The TEN-T network policy should focus on promoting seamless traffic flows from, to, through and across Urban Nodes on the network.

Under the revised TEN-T Regulation, Urban Nodes are required to prepare or update **Sustainable Urban Mobility Plans (SUMP)** by **December 2027**, establishing coherent investment pipelines that promote sustainable transport modes and strengthen the connections between urban centres and their surrounding regions. In parallel, they must collect and analyse **Urban Mobility Indicators (UMIs)**, ensuring that policy decisions and investments are underpinned by robust, comparable and timely data. The Regulation further mandates the development of **intermodal passenger interchanges by 2030** and **freight hubs by 2040**, reinforcing modal shift and more efficient logistics chains across the network.

Together, these elements reflect a clear policy choice: EU transport objectives related to decarbonisation, resilience, competitiveness and territorial cohesion can only be achieved if Urban Nodes are able to function effectively as essential building blocks in the TEN-T network.

The delivery of projects within urban nodes is addressed by the competent local, regional or national authorities, in response to their SUMP and the corridor development across their urban node. In addition, the Regulation states that ‘The interests of regional and local authorities, as well as those of the public concerned by a project of common interest, should be appropriately taken into account in the planning and construction phase of projects.’

2. Why investments in urban nodes projects are essential for a performing and sustainable TEN-T network?

Urban Nodes projects used to be eligible for funding under the current CEF II programme, allowing the financing of pre-construction studies or infrastructure investment projects under this instrument. These projects are essential for addressing negative externalities of transport, such as congestion, and for tackling capacity shortages or insufficient multimodality in transport infrastructure. By connecting local and regional transport with long-distance transport, they guarantee the performance of the corridors. CEF funding not only brings financial support, but also adds value in view of project management, quality assurance, and incorporation of European expertise.

- **The city of Leuven** will receive funding for the MUNOLENO (MULTimodal NOde LEuven NOrth) project, which aims to strengthen the international connections of Leuven and the wider Leuven region, thereby supporting the growth of strategic sectors such as knowledge and healthcare. The project will finance studies to connect Leuven’s train station with the future Leuven-Noord Innovation District and to expand Leuven’s bus station. As such, the project is expected to enhance the city’s cross-border connectivity by improving railway links, boosting connections with Brussels International Airport, and strengthening overall multimodality around the Urban Node.
- **The Contournement ferroviaire de l’agglomération lyonnaise (CFAL - "Lyon bypass")** is an excellent illustration of why urban node projects must remain eligible for CEF funding: designed to divert freight trains away from the saturated Étoile ferroviaire lyonnaise, the CFAL—new traffic infrastructure with a northern section already declared of public utility and a southern section in advanced study—directly frees capacity for regional, high speed and long distance passenger services, strengthens major TEN-T freight corridors, and underpins the Lyon–Turin axis. Importantly for the funding case, the project did receive CEF support for early stage studies, but the current detailed study phases are no longer CEF funded, highlighting a gap that risks delaying a strategic, EU relevant capacity unlocking project; maintaining urban node eligibility would ensure continuity from studies to implementation and avoid stagnation on a bottleneck whose resolution benefits the entire network.

- Île-de-France region example: Enhancing European Connectivity through the Grand Paris Express Line 18** - Line 18 of the Grand Paris Express will connect Orly Airport to the Massy–Palaiseau multimodal hub. The project has received co-financing under the Connecting Europe Facility (CEF), 64 million euro within the priority dedicated to Urban Nodes. It illustrates how Urban Nodes can strengthen integration within the TEN-T corridors. Beyond linking an international airport with a major high-speed rail station, Line 18 will enhance connectivity with the wider public transport network. The line will provide approximately twelve interconnections with existing services, including RER lines B and C, Transilien lines N and U, tramways T7 and T12, metro line 14 at Orly, as well as multiple bus routes. The development of Line 18 has enabled Île-de-France Mobilités, the regional transport authority, to coordinate the integration of the Grand Paris Express station at Massy–Palaiseau in cooperation with relevant stakeholders. The station forms part of a multimodal hub combining RER B and C stations, the TGV station and two bus terminals, thereby strengthening intermodality and passenger accessibility. The new connections will allow passengers arriving in the Île-de-France region via Orly Airport or the Massy TGV station to continue their journeys using a wide range of sustainable transport modes. In addition, Line 18 will serve the Saclay Plateau, one of Europe’s leading research and innovation clusters, hosting universities, higher education institutions and research centres. The line is expected to play a key role in supporting the area’s scientific and economic development while improving local and regional mobility.

Neglecting Urban Nodes may result in the loss of significant value from investments undertaken along the corridors and will impact the overall performance of the TEN-T corridors and the free flow of goods and people in Europe. Without strong interconnections with feeder services within urban nodes, meaningful modal shift towards transport services that utilize new cross-border infrastructures is unnecessarily difficult to achieve.

- The Rail Baltica Project is an emblematic initiative aiming to connect the capitals of the Baltic States with the rest of the European continent. The project has received support through several CEF calls, the most recent being an award of €295 million under the 2025 call. However, to date, **the funding needed to ensure effective connections between the high-speed railway infrastructure and the respective capital cities has not been secured.** As a result, the **project’s estimated €48 billion in economic benefits remains at risk of not being fully realised.**
- The Fehmarn Belt Fixed Link is another emblematic project, aiming to improve road and rail connections between the Danish island of Lolland and the German island of Fehmarn. The project is expected to significantly enhance connectivity between the European continent and the Scandinavian Member States. **However, according to the project’s impact assessment, without improvements in key urban nodes—such as the functional urban area of Malmö—major cross-border investments risk being neutralised by congestion.** In that regard, when it comes to rail freight, only a moderate increase in rail transport up to +25% is expected despite shorter travel time (–3 h) due to the limited network capacity within the Urban Node.

PROPOSED AMENDMENTS

Proposal	Amendment
Recitals	
<p>(...)</p>	<p>(new)</p> <p>2b. Urban nodes play an important role on the trans-European transport network as starting point or final destination ('last mile') for passengers and freight moving on the trans-European transport network and are points of transfer within or between different transport modes. They are essential to the completion and performance of the TEN-T corridors and to the delivering of the Union's ambition in terms of long-distance transport journeys, as recently emphasised in the Communication 'Connecting Europe through High-Speed Rail'. Support to urban nodes project should be secured to address capacity bottlenecks along the corridors to ensure that an insufficient network connectivity within urban nodes no longer hamper multimodality along the trans-European transport network. The trans-European transport network policy should focus on promoting seamless traffic flows from, to and across urban nodes on the network. The local connectivity within urban nodes should be addressed by the competent local, regional or national authorities, in particular through relevant measures of their sustainable urban mobility plans (SUMP) which adoption is mandated by the TEN-T regulation 2024/1679.</p>
<p>(4) In order to achieve the objectives laid down in Regulation (EU) 2024/1679, it is necessary to financially support the development cross-border, including ports and their hinterland connections as well as the deployment of alternative fuels, and the elimination of missing</p>	<p>(4) In order to achieve the objectives laid down in Regulation (EU) 2024/1679, it is necessary to financially support the development cross-border, including ports and their hinterland connections as well as the deployment of alternative fuels, and the elimination of missing</p>

links and to ensure, where applicable, that the actions supported by the Programme are consistent with the corridor work plans drawn up in accordance with Article 54 of Regulation (EU) 2024/1679 and with the overall network development regarding performance and interoperability.

(16) Synergies between the development of trans-European networks in transport and energy and cross-border projects in the field of renewable energy with strong cross border impact supported by CEF, and transport and energy projects in the scope of the National and Regional Partnership Plans, the Framework Programme for Research and Innovation, and the European Competitiveness Fund should be ensured. Synergies could also imply support for Important Projects of Common European Interest (IPCEI) focussing on cross-border infrastructure in the transport and energy sector.

(21) The Programme should optimise the use of available funding through close monitoring of the funding made available and through applying, where appropriate, reduction or termination of grants. This should allow the reallocation of the budget dedicated to an action that remains unspent during its designated timeframe to other actions falling within the scope of this Programme.

links **and bottlenecks along the corridors, specifically in Urban Nodes**, and to ensure, where applicable, that the actions supported by the Programme are consistent with the corridor work plans drawn up in accordance with Article 54 of Regulation (EU) 2024/1679 and with the overall network development regarding performance, **multimodality** and interoperability.

(16) Synergies between the development of trans-European networks in transport and energy and cross-border projects in the field of renewable energy with strong cross border **or TEN-T corridor** impact supported by CEF, and transport and energy projects in the scope of the National and Regional Partnership Plans, the Framework Programme for Research and Innovation, and the European Competitiveness Fund should be ensured. Synergies could also imply support for Important Projects of Common European Interest (IPCEI) focussing on cross-border infrastructure in the transport and energy sector.

(21) The Programme should optimise the use of available funding through close monitoring of the funding made available and through applying, where appropriate, reduction or termination of grants. This should allow the reallocation of the budget dedicated to an action that remains unspent during its designated timeframe to other actions falling within the scope of this Programme. **The Programme must guarantee the regular publication of calls for proposals under the CEF, ensuring a balanced distribution of funds over the period 2028-2034, in order to maintain a stable and predictable level of funding.**

Article 2 – Definitions

9. ‘works’ means the purchase, supply and deployment of components, systems and services including software, the carrying out of development and construction and installation activities relating to a project, the acceptance of installations and the launching of a project;

9. ‘works’ means the purchase, supply and deployment of components, systems and services including software, the carrying out of **adaptation**, development and construction and installation activities relating to a project, the acceptance of installations and the launching of a project;

(...)

12. ‘Urban node ’means an urban area where elements of the transport infrastructure of the trans-European transport network for passengers and freight, such as ports, including passenger terminals, airports, railway stations, bus terminals and multimodal freight terminals, located in and around the urban area are connected with other elements of that infrastructure and with the infrastructure for regional and local traffic, including infrastructure for active modes as defined in article 3, point (6) of Regulation (EU) 2024/1679

Justification: this set of amendments aims at reinstalling the definition of urban nodes in the text of the proposal, as already included in the TEN-T regulation and the CEF II regulation. It also aims at shedding light on the key role of investment in urban nodes to preserve the performance of the TEN-T corridors by eliminating bottlenecks and ensuring multimodal interconnection of the corridor infrastructures.

The precise definition of adaptation activities is essential, as these might otherwise not be clearly covered by the sole concepts of development or construction. This clarification ensures that projects aimed at improving or adapting existing infrastructure remain fully eligible for CEF funding.

Article 3 - Programme objectives

1. The Programme has the following specific objectives:

(a) in the transport sector:

(i) to contribute to the development of projects of common interest relating to interconnected, interoperable, decarbonised, smart, safe, sustainable, resilient, secure and multimodal transport networks in accordance with Regulation (EU) 2024/1679, in particular through:

- (1) actions relating to the projects of common interest with cross border dimension implementing the trans-European transport network, including actions on the indicative sections listed in the Annex to this Regulation;
- (2) actions relating to the projects of common interest with Union dimension relating to the completion of a smart, resilient, decarbonised and sustainable trans-European transport network;
- (3) actions relating to the projects of common interest with crossborder dimension with third countries implementing the transEuropean transport network in accordance with Article 9 of Regulation (EU) 2024/1679;

(ii) to adapt parts of the trans-European transport network for the dual use of the transport infrastructure with a view to improving both civilian and military mobility, focusing on the four EU Priority Military

1. The Programme has the following specific objectives:

(a) in the transport sector:

(i) to contribute to the development of projects of common interest relating to interconnected, interoperable, decarbonised, smart, safe, sustainable, resilient, secure and multimodal transport networks in accordance with Regulation (EU) 2024/1679, in particular through:

- (1) actions relating to the projects of common interest with cross border dimension implementing the trans-European transport network, including actions on the indicative sections listed in the Annex to this Regulation;
- (2) actions relating to the projects of common interest, **including actions on urban nodes** with Union dimension relating to the completion **and performance** of a smart, **interoperable, multimodal safe**, resilient, decarbonised and sustainable trans-European transport network;
- (3) actions relating to the projects of common interest with crossborder dimension with third countries implementing the transEuropean transport network in accordance with Article 9 of Regulation (EU) 2024/1679;

(ii) to adapt parts of the trans-European transport network for the dual use of the transport infrastructure with a view to improving both civilian and military mobility, focusing on the four EU Priority Military Mobility Corridors, **sections and or nodes** identified by

Mobility Corridors identified by Member States in Annex II to the Military Requirements for Military Mobility within and beyond the Union, as approved by the Council on 18 March 2025 and with reference ST 6728/25 ADD1;

Member States in Annex II to the Military Requirements for Military Mobility within and beyond the Union, as approved by the Council on 18 March 2025 and with reference ST 6728/25 ADD1; (b) in the energy sector, **or any subsequent list of priority projects that will be identified by Member States in accordance with the Military Mobility package presented on the 19 November 2025.**

Justification: These amendments reintegrate urban node investment projects that can demonstrate true EU added value into the list of eligible projects for CEF funding. The Urban Nodes Alliance is convinced that supporting urban node related projects can alleviate pressure on the TEN-T corridors and enhance the overall performance of the network. It would also allow urban node priorities to be fully embedded within corridor priorities, ensuring greater alignment between the two and thereby improving the sustainability of door-to-door journeys along the TENT corridors.

Any journey undertaken within the TEN-T network begins and ends in an urban node, where multimodal hubs are located. We therefore consider it essential that multimodality and interoperability be explicitly mentioned in the final text, in order to ensure its eligibility as a beneficiary of the CEF under the new MFF.

The same logic applies to military mobility: potential bottlenecks resulting from underinvestment in infrastructure within urban nodes may hinder the movement of military assets across Europe.

Article 9 – Eligibility

6. Grant proposals shall be submitted by one or more Member States or with the approval of the Member States concerned by the project of common interest or project of mutual interest.

6. To be eligible, proposals shall be submitted:

(a) by one or more Member States; or

(b) with the information of the Member States concerned, by international organisations, joint undertakings, or by public or private undertakings or bodies, including regional or local authorities in case the project has been identified as a priority under the corridor work plan established pursuant to article 56 of Regulation (EU) 2024/1679

If the Member State concerned does not agree with a submission under point (b) of the first subparagraph, it shall communicate that information accordingly.

A Member State may decide that, for a specific work programme or for specific categories of applications, proposals may be submitted without its agreement. In such case, this shall, at the request of the Member State concerned, be indicated in the relevant work programme and in the call for such proposals.

Justification: The Urban Nodes Alliance recommends maintaining the current submission process in which Member States are not required to approve project submissions, provided these projects funded by local and regional budgets. This approach is a continuation of the current CEF-2 procedure, ensures a simplified procedure and reduces the administrative burden on project promoters when preparing proposals. The Alliance also proposes strengthening the corridor-based logic of the submission process by removing the requirement for Member State approval when urban-node authorities or other entities listed in the Regulation submit a project. In line with Article 54 of the TEN-T Regulation, the European Coordinator for each TEN-T corridor is responsible for drawing up a development plan for the corridor and identifying the bottlenecks that must be addressed.

Contacts:

EGTC Rhine Alpine Corridor: Sara SCAVIZZI - sara.scavizzi@egtc-rhine-alpine.eu

EMTA: Thomas GEIER - thomas.geier@emta.com

ERRIN: Gaia MAROTTA - gaia.marotta@errin.eu

ETSC: Ellen TOWNSEND - ellen.townsend@etsc.eu

EUROCITIES: Thomas Lymes - thomas.lymes@eurocities.eu

ICLEI: Vanessa Holve - vanessa.holve@iclei.org

Île-de-France Europe: Françoise GUASPARE-GAL - francoise.guaspere@iledefrance-europe.eu

POLIS : Ivo Cré – icre@polisnetwork.eu

Scandria Alliance: Tommi VOLLMANN - tommi.vollmann@gl.berlin-brandenburg.de

UITP: Mathilde PETIT - mathilde.petit@uitp.org