



Helsinki-Uusimaa
Region



Vantaa
Vanda



ESPOO
ESBO

TAMPERE.
FINLAND



PIRKANMAA
COUNCIL OF TAMPERE REGION



CITY OF
TURKU



Regional Council of
Southwest Finland

HELSINKI REGION
CHAMBER OF COMMERCE

Amendments from the Regions of Helsinki-Uusimaa, Southwest Finland and Pirkanmaa

On the Commission proposal for a regulation establishing the Connecting European Facility for the period 2028-2034 (EU) 2021/1153

20th April 2026

The Regions of Helsinki-Uusimaa, Southwest Finland and Pirkanmaa, which together constitute the so-called Growth Triangle of Finland, welcome the forward-looking and strong Commission proposal for a regulation establishing the Connecting European Facility (CEF) for the period 2028-2034. All three regions support the increased funding for CEF-Transport, CEF Energy and the strengthened support for military mobility in the next CEF during the Multiannual Financial Framework 2028–2034 (MFF).

In Finland the meaning of stable, secure, clean and trustworthy energy and transport connections has increased as result of the changed geopolitical situation. As a result of the Russian aggression, Finland has become nearly completely dependent on the functionality and resilience of maritime transport in the Baltic Sea. Before the aggression, 90 percent of Finland's exports and imports passed through the Baltic Sea. Since the start of the Russian war of aggression against Ukraine, this share has increased to over 95 percent. The closure of Russian airspace and border crossings has also emphasized the important role of air linkages. Finland's major air hub, Helsinki-Vantaa airport, is the only EU mid-sized airport that has not reached pre-Covid passenger levels. To summarize, as regions close to the border of Russia, without land borders to other EU member states, CEF has a heightened strategic importance.

Besides secure connections, emission reduction targets play an important role when considering sustainable transport connections and financing. As an example, in Helsinki-Uusimaa Region, the transport sector accounts for 37 % of greenhouse gas emissions (2024). This has increased by 4 % compared to the previous year. As Helsinki-Uusimaa Region is aiming at climate neutrality by the year 2030, a decrease of these emissions is a necessity.

CEF funding is a key instrument for strengthening the EU's cohesion, competitiveness, and security. For the Growth Triangle of Finland, it plays a crucial role in ensuring accessibility and connectivity with the rest of Europe. With 2.8 million inhabitants, representing 50 % of Finland's population, the Growth Triangle of Finland generates more than 55 % of the national GDP and almost 70 % of all Finnish RDI investments. Strong integration into European transport and energy networks of the three regions is not only vital for Finland's economy but also contributes directly to Europe's resilience,

security of supply and innovation capacity. Stronger energy and transport linkages between Finland's strong economic centers to Nordic and Baltics create a safer, cleaner and economically prosperous Northern Europe, clearly adding value to the European project.

The Growth Triangle of Finland supports the main priorities and characteristics of the Commission proposal but calls upon the following emphasis and missing aspects.

Our key messages and proposed amendments

1. Airports and their hinterland connections, including long-distance and high-speed train connections, should be funded by CEF

Air connectivity remains crucial for the development of outermost regions, island states as well as for regions in member states which have limited shared EU borders. This has not been taken up in the regulation proposal, which defines only ports as entry or exit points. Moreover, the TEN-T regulation (EU) 2024/1676 specifies that large and mid-sized European airports should be connected to the high-speed long-distance rail network by 2040, thus enabling multimodality and the reduction of transport related emissions.

2. CEF should recognize the role of Urban Nodes

Urban nodes, as defined in the TEN-T regulation, are not reflected in CEF. Yet, regional and local authorities are required to develop sustainable urban mobility plans (SUMP by 2027) and multimodal passenger (2030) and freight terminals (2040) as well as for these urban nodes, as mandated in the TEN-T regulation. Thus, urban nodes should be taken into account in the next CEF.

3. Regional and local authorities as well as established cooperation platforms between them, should be involved in project design, implementation and evaluation

As regional and local authorities often bear some of the costs of energy and transport projects, they should be included in the planning processes between the member states and the European Commission. Equally, established regional cross-border entities, such as European Groupings of Territorial Cooperation (EGTC), should be recognized as eligible legal entities in the CEF.

4. The indicative list of projects of common interests (CEF proposal, Annex 2) should be amended as concluded by the Partial Mandate of the Council of the European Union

The Council of the European Union adopted partial mandate on the Connecting Europe Facility (CEF III) on 15 December 2025. Among adopted changes/additions Council approved the extension of Rail Baltica via Helsinki to Tampere and the Stockholm-Turku-Helsinki connection to the "priority list" of projects. We endorse this position, which will enhance the European single market by binding Finland's most populous areas towards the Baltics and the Nordics, creating both economic growth while strengthening the Eastern Flank of the European Union.



Proposals for Amendments

1. Airports and their hinterland connections, including long-distance and high-speed train connections, should be funded by CEF

Amendment 1

Explanatory memorandum – Context of the proposal

Text proposed by the Commission

(...) For transport, the CEF aims to contribute to the completion of the trans-European transport network ('TEN-T'), with the focus on completing the core and extended core network by 2030 and 2040. The development of a European wide multimodal transport network is a key condition for growth and sustainability in Europe – from the entry points which are the ports to the basic land connections needed for the single market and the connectivity of regions. In this context, the CEF will in particular concentrate on infrastructure projects with a strong cross-border dimension, such as the Rail Baltica project, the Brenner Base Tunnel, the Seine-Escaut inland waterway, Brno-Bratislava, Thessaloniki-Bucharest or the development of hinterland connections of TEN-T ports. (...)

(...) CEF-funded investments also support the transition towards clean, interoperable and multimodal mobility. The CEF is also helping to develop a European high-speed rail network aimed at connecting EU capitals (including through night trains), and to accelerate rail freight.(...)

Amendment

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(...) CEF-funded investments also support the transition towards clean, interoperable and multimodal mobility. The CEF is also helping to develop a European high-speed rail network aimed at connecting EU capitals (including through night trains), and to accelerate rail freight. **CEF investments will encourage cleaner and multimodal mobility by supporting the connection of mid-sized and large European airports to the European high-speed train network as defined in Regulation (EU) 2924/1694 (...)**



Justification

For island nations and regions with limited land EU borders, such as Finland, airports are an important entry points. Adding airports and their multimodal hinterland connections, as mandated by the TEN-T regulation, to the CEF regulation. The current TEN-T regulation specifies that medium-sized airports should be connected to the high-speed long-distance rail network by 2040 (article 34). *(a) the airports of the trans-European transport network with a total annual passenger traffic volume of more than 12 million passengers are connected to the trans-European railway network, including the high-speed railway network where possible, allowing long distance services by 31 December 2040 (...);*

Amendment 2

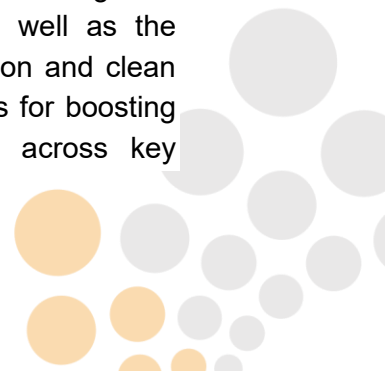
Recital 2

Text proposed by the Commission

(2) Efficient transportation of people and goods is an essential pillar for the functioning of the Union, playing a crucial role in fostering competitiveness and economic growth, ensuring cohesion, and achieving climate and environmental objectives. The ability of citizens and goods to move freely and efficiently in a well-connected and complete single market enhances connectivity, ensures access to jobs and services, and supports local economies and trade. At the same time, a decarbonized and sustainable transport system is a condition to meet the Union's climate goals and address the Union's economy's strategic and unsustainable dependence on fossil fuel. Effective and secure freight transport is indispensable for the supply of necessary goods to citizens, keeping our economy running and backing our military security. The Draghi report on the future of competitiveness of Europe, recognises the importance of raising investments in transport infrastructure and emphasises the need for an integrated multimodal transport market as well as the strong demand for decarbonization and clean solutions. The

Amendment

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Draghi report calls for boosting the digitalisation in the Union across key economic sectors, such as transport. The Letta report on the future of the internal market highlights the transport sector as a key area where deeper European integration is essential to fully unlock the potential of the internal market. The Letta report underlines notably the need to complete the TEN-T network and highlights the opportunities of a pan-European high-speed rail network to revolutionise European travel and catalyse Union integration. The Niinistö report on Europe's civilian and military preparedness stresses the importance of dual-use transport corridors for military movements and supply chains and the resilience of the transport infrastructure to climate change and as well as the need for secure maritime supply routes used for the Union's external trade.

economic sectors, such as transport. The Letta report on the future of the internal market highlights the transport sector as a key area where deeper European integration is essential to fully unlock the potential of the internal market. The Letta report underlines notably the need to complete the TEN-T network and highlights the opportunities of a pan-European high-speed rail network, **including multimodal solutions such as linking major European airports to the long distance train network**, to revolutionise European travel and catalyse Union integration. The Niinistö report on Europe's civilian and military preparedness stresses the importance of dual-use transport corridors for military movements and supply chains and the resilience of the transport infrastructure to climate change and as well as the need for secure maritime supply routes used for the Union's external trade. **The Programme's scope should encompass the whole TEN-T core network, including urban nodes, which are central for economic vitality and connectivity as well as security of supply and military mobility.**

Justification

The scope should be extended to include the TEN-T core network, including urban nodes and airport connections. TEN-T urban nodes are central hubs of transport connectivity, decarbonisation and economic development, serving as critical multimodal gateways linking long-distance corridors with regional and local networks to enable smooth passenger and freight flows. Sufficient funding is needed, as the deadline for the TEN-T core network is in 2030. Also, countries like Finland, which have limited cross-border connections, should be able to consider national projects with cross-border linkages for funding.

2. CEF should recognize the role of Urban Nodes

Amendment 3

Recital – new 2b

Text proposed by the Commission

***Amendment
New***



(...)

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, connecting to ports and airports, 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.

Justification

Amendment aims at reinstalling the definition of urban nodes, already included in the TEN-T regulation and CEF II regulation, while shedding light on the role of urban nodes as hubs for multimodal transport hubs, such as enabling a seamless exchange from airplanes to railways.

Amendment 4

Article 3 – specific options

Text proposed by the Commission

Amendment

1. The Programme has the following specific objectives:

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(a) in the transport sector:

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(i) to contribute to the development of projects of common interest relating to interconnected,



(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 trans-European transport network in accordance with Article 9 of Regulation (EU) 2024/1679;

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, ports and airports** 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 trans-European transport network in accordance with Article 9 of Regulation (EU) 2024/1679;

Justification

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, such as linking ports and airports to the wider TEN-T network, 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.

3. Regional and local authorities as well as established cooperation platforms between them, should be involved in project design, implementation and evaluation

Amendment 5

Recital 4

Text proposed by the Commission

Amendment



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 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.*

(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, **airports** and their hinterland connections, as well as the deployment of alternative fuels, **and the elimination of missing links and the development and upgrading of urban nodes and their multimodal access infrastructure**, 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. **Local and regional authorities should be consulted, where appropriate. Furthermore, Member States' geographical specificities should be considered when assessing the cross-border dimension of projects eligible for funding under the Programme.**

Justification

Urban nodes are central hubs of transport connectivity, decarbonisation and economic development, serving as critical multimodal gateways linking long-distance corridors with regional and local networks to enable smooth passenger and freight flows. Furthermore, Member States have very different geographical specificities and these need to be reflected when assessing cross-border dimension eligibility criteria. Local and regional authorities have a deep understanding of local transport infrastructure circumstances and should be included in the processes.

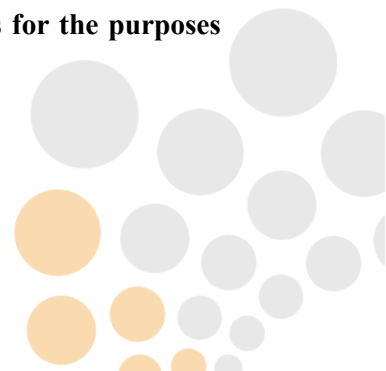
Amendment 6

Article 2 – Definitions add a new paragraph (12)

Text proposed by the Commission

Amendment

(12) European Groupings of Territorial Cooperation (EGTCs) and other recognised cross-border territorial cooperation structures shall be considered eligible legal entities for the purposes of this Regulation.



Justification

To ensure cross-border regional groupings – central to planning, permitting and local implementation and possessing the key knowledge of the territory – have clear eligibility to participate in CEF-funded actions.

Amendment 7

Article 5 – Additional resources, paragraph (1)

Text proposed by the Commission

Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties may make additional financial or non-financial contributions to the Programme, without prejudice to Articles 107 and 108 TFEU. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e), or Article 21(5) of Regulation (EU, Euratom) 2024/2509.

Amendment

Member States, Union institutions, bodies and agencies, **local and regional authorities**, third countries, international organisations, international financial institutions, or other third parties may make additional financial or non-financial contributions to the Programme, without prejudice to Articles 107 and 108 TFEU. Additional financial contributions shall constitute external assigned revenue within the meaning of Article 21(2), points (a), (d), or (e), or Article 21(5) of Regulation (EU, Euratom) 2024/2509.

Justification

Self-explanatory.

Amendment 8

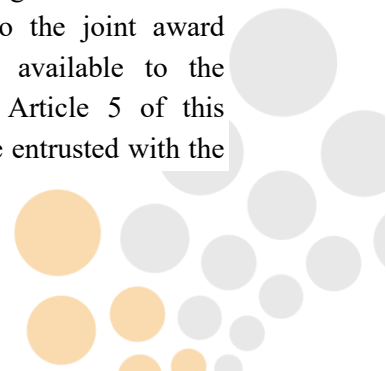
Article 6 – Alternative, combined and cumulative funding, paragraph (2)

Text proposed by the Commission

2. Award procedures under the Programme may be conducted jointly under direct or indirect management with Member States, Union institutions, bodies and agencies, third countries, international organisations, international financial institutions, or other third parties ('partners to the joint award procedure'), provided the protection of the financial interests of the Union is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that purpose, the partners to the joint award procedure may make resources available to the Programme in accordance with Article 5 of this Regulation, or the partners may be

Amendment

2. Award procedures under the Programme may be conducted jointly under direct or indirect management with Member States, Union institutions, bodies and agencies, **local and regional authorities**, third countries, international organisations, international financial institutions, or other third parties ('partners to the joint award procedure'), provided the protection of the financial interests of the Union is ensured. Such procedures shall be subject to a single set of rules and lead to the conclusion of single legal commitments. For that purpose, the partners to the joint award procedure may make resources available to the Programme in accordance with Article 5 of this Regulation, or the partners may be entrusted with the



entrusted with the implementation of the award procedure, where applicable in accordance with Article 62(1), point (c), of Regulation (EU, Euratom) 2024/2509. In joint award procedures, representatives of the partners to the joint award procedure may also be members of the evaluation committee referred to in Article 153(3) of Regulation (EU, EURATOM) 2024/2509.

Justification

Self-explanatory.

Amendment 9

Article 9 – Eligibility, paragraph (2)

Text proposed by the Commission

2. In award procedures under direct or indirect management, one or more of the following legal entities may be eligible to provide or to receive Union support:

(a) entities established in a Member *States*;

(...)

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.

Amendment

2. In award procedures under direct or indirect management, one or more of the following legal entities may be eligible to provide or to receive Union support:

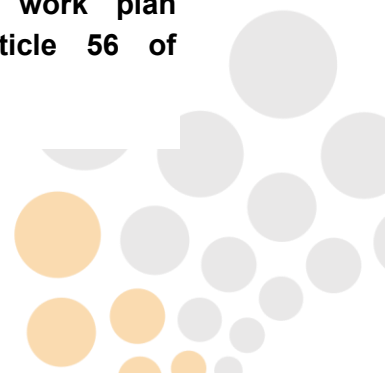
(a) entities established in a Member *State*, including local and regional authorities, European Groupings of Territorial Cooperation (EGTCs), public-law bodies managing multimodal nodes and strategic logistics platforms, and recognised cross-border regional cooperation structures;

(...)

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.

4. The indicative list of projects of common interests (CEF proposal, Annex 2) should be amended as concluded by the Partial Mandate of the Council of the European Union

Amendment 10

Annex II

Text proposed by the Commission

Amendment

Scandinavian — Mediterranean Corridor

- Munich - Verona (covering the Brenner Base tunnel)
- Copenhagen - Lübeck (covering the Fehmarnbelt tunnel)
- Umeå - Luleå - Oulu (Bothnian corridor)
- Stockholm – Oslo

Scandinavian - Mediterranean Corridor

Adding:

Stockholm - Turku – Helsinki

North Sea — Baltic Corridor

- *Tallinn - Riga - Vilnius - Warsaw (Rail Baltica)*

North Sea – Baltic Corridor

Adding:

***Tampere - Helsinki - Tallinn - Riga - Vilnius - Warszawa
(covering Rail Baltica)***



Justification

The Council of the European Union adopted partial mandate on the Connecting Europe Facility (CEF III) 15 December 2025. Among adopted changes/additions Council approved the extension of Rail Baltica via Helsinki to Tampere and the Stockholm-Turku-Helsinki connection to the “priority list” of projects. We endorse this position, which will bind Finland’s most populous areas towards the Baltics and the Nordics, creating dual-use synergies.

