

De: VNCONF - Dados pessoais
Enviado: 6 de abril de 2026 11:03
Para: Consulta Pública
Assunto: RV: DEADLINE EXTENDED: EPR/2024/8 - Portuguese Competition Authority – Autoridade da Concorrência | Public consultation: preliminary market study "Competition in the rail passenger and freight transport sector in Portugal" (new deadline: 07.04.2026)

Dear Sirs,

After a careful review of the recommendations provided by the Autoridade da Concorrência (AdC) Renfe presents the following comments for AdC consideration with the goal of contributing to a positive long-term impact on the competitiveness, efficiency and robustness of Portugal's rail sector:

- Renfe considers that the establishment of systems and processes that enable rail operators recover (i.e., get reimbursed for) the value of the energy they feed back into the system through regenerative braking would not only encourage greater sustainability and efficiency, but also greater economic fairness as well as better cost competitiveness of rail vs other transport modes.
- It appears that AdC is suggesting that Portugal implements a model like the one applied in Spain. However, the long-term impact of that type of infrastructure capacity allocation model is unknown. Applying untested models would entail assumption of significant risks by Portugal's transport sector and its economy, as it can result that the liberalization of commercial services does not reach its full potential or that it may even fail. There are other examples of failed liberalization models like the United Kingdom, which, after a few initial years of apparent success, it was ultimately deemed negative and resulted in a high costs for the country.

For this reason, Renfe understands that it is desirable that Portugal does not undertake an experiment of unknown results, and instead it follows tested model that has already proven its success. This is the model followed for the widely recognized success of the EU's airline liberalization and commercial service rail liberalization in other EU countries like Italy. The available train paths (slots in the air sector) are allocated to the rail operator after it proves that it complies with all the technical requirements established to operate over that infrastructure.

Best regards

De: Consulta Pública <consultapublica@concorrencia.pt>

Enviado: viernes, marzo 27, 2026 5:42:56 p. m.

Para: Renfe Proyectos Internacionales <rpi@renfe.es>

Asunto: DEADLINE EXTENDED: EPR/2024/8 - Portuguese Competition Authority – Autoridade da Concorrência | Public consultation: preliminary market study "Competition in the rail passenger and freight transport sector in Portugal" (new deadline: 07.04.2026)

AVISO DE SEGURIDAD RENFE

Este mensaje proviene de fuera de la organización. Por favor, no pulse enlaces o abra adjuntos a menos que conozca al remitente o bien sepa que su contenido es seguro.

Dear Sirs, Renfe

This notice hereby serves as to inform you that, after an extension was approved, the public consultation on the preliminary version of the market study "Competition in the rail passenger and freight transport sector in Portugal" is now running until

the **7th of April 2026** (see [the AdC's website](#)). All interested parties are invited to submit comments and/or written observations to the AdC to the following email address: consultapublica@concorrencia.pt.

In replying to this request, the AdC asks that, in view of the legal regime for access to administrative information and the legal regime on the protection of personal data, the parties identify the information that consider confidential, namely because it contains **business secrets or personal data**, attaching, where appropriate, a non-confidential copy without those confidential elements and the respective grounds for confidentiality.

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Best regards,

Portuguese Competition Authority – Autoridade da Concorrência
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Avenida de Berna, nº 19. 1050-037 Lisboa
consultapublica@concorrencia.pt

De: Consulta Pública <consultapublica@concorrencia.pt>

Enviado el: martes, 3 de marzo de 2026 12:39

Para: Renfe Proyectos Internacionales <rpi@renfe.es>

Asunto: EPR/2024/8 - Portuguese Competition Authority – Autoridade da Concorrência | Public consultation: preliminary market study "Competition in the rail passenger and freight transport sector in Portugal" (deadline: 30.03.2026)

AVISO DE SEGURIDAD RENFE

Este mensaje proviene de **fuera de la organización**. Por favor, no pulse enlaces o abra adjuntos a menos que conozca al remitente o bien sepa que su contenido es seguro.

Dear Sirs, Renfe

Within the scope of its supervisory powers, in a context marked by relevant public investments — namely in the construction of high-speed lines and the renewal of rolling stock — the Portuguese Competition Authority (Autoridade da Concorrência – AdC) conducted a market study on the conditions of competition in the rail passenger and freight sector in Portugal.

In particular, the study identifies several obstacles to competition in passenger rail transport, notably the lack of competitive public tenders and difficulties in accessing essential inputs such as rolling stock and human resources. These problems are compounded by the characteristics of the national railway network, which requires rolling stock compatible with the Iberian gauge and the CONVEL signaling system.

Other barriers are also identified, namely those related to access to the national railway infrastructure and to the complementary services necessary for railway operators to provide competitive commercial services to end consumers. The AdC puts forward a set of recommendations to mitigate barriers to entry for railway operators

In this context, the AdC is launching a public consultation on the preliminary version of the market study "Competition in the rail passenger and freight transport sector in Portugal" (see [the AdC's website](#)). All interested parties are invited to submit comments and/or written observations to the AdC within **20 working days** (by **30 March 2026**) to the following email address: consultapublica@concorrencia.pt.

In replying to this request, the AdC asks that, in view of the legal regime for access to administrative information and the legal regime on the protection of personal data, the parties identify the information that consider confidential, namely because it contains **business secrets or personal data**, attaching, where appropriate, a non-confidential copy without those confidential elements and the respective grounds for confidentiality.

Best regards,

Portuguese Competition Authority – Autoridade da Concorrência

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