The Czech Republic proposal on ISCC suggestion related to the Article 10, par 3 of the Draft Protocol on Sustainable transport to the Convention on the Protection and sustainable development of the Carpathian

**The Czech Republic proposal**

f) conserving and improving the regional low-density line of railway network

**Explanation**

The Czech Republic does not know what was behind the Ukraine’s concern with the originally agreed text ("secondary network of railways"). However with the new proposed text some concerns and doubts arise on our side.

Firstly we have problem to understand the precise meaning of the new text. Secondly we are concerned that with such wording the interpretation of this provision could be quite different from its original purpose. “Low density lines” are in our understanding lines with very limited traffic flows where one could argue whether it is from the economic point of view sustainable to preserve them. Such possible interpretation would be very problematic as this provision would then advocate not only for conservation but even for improvement of such railway lines. This would be totally in opposite to the general orientation of the current Czech Transport Policy. Therefore we suggest some more precise wording that is in our view more closely to the original text.