

## **Sustainable Future of Transport in Europe: Ireland Response**

Ireland welcomes the Commission's communication on the *Sustainable Future for Transport*. In February 2009, the Irish Government published *Smarter Travel: a Sustainable Transport Future for Ireland*, which similarly highlighted the need for sustainable transport development. The two documents have much in common. Because of the responsibility for transport policy at national level, it will be important that the EU focuses on adding value where possible and appropriate, rather than becoming entangled in domestic MS issues.

The following paper highlights the main issues arising for Ireland from the Communiqué.

- **Current Consultation Process**

The Commission could make more effective outreach so that all European transport stakeholders including those located at the periphery can be involved and included in EU policy developments. In particular the Commission should ensure that multiple responses are received from interests in every Member State in the EU, otherwise the adequacy and legitimacy of the subsequent proposals arising from de facto selective consultation can be called into question.

'A one size fits all approach' to consultation will not result in effective engagement by all stakeholders. In smaller countries, with relatively fewer administrative resources, specificities may not emerge until legislative proposals are formally presented to Member States in the European Council. The Commission could consider organising roadshows in every Member State with a view to collecting inputs for the development of the White Paper. This could also help dispel perceptions that policy is determined by 'elite' industry stakeholders in Brussels.

- **Integrating and Maintaining Infrastructure**

Infrastructure is essential for EU territorial, economic and social cohesion. It facilitates improved accessibility and connectivity between Member States and with third countries. The development of an integrated transport strategy for both freight and passenger transport that seeks to optimise the contribution of each transport mode in the interests of improved economic competitiveness and environmental sustainability is needed.

For freight, this should build on the work undertaken to date with the Freight Action Plan and freight transport corridors. In particular there is a need to fully exploit the potential of short sea shipping between and within Member States. There needs to be increased investment in port capacity for short sea and deep sea shipping. New shipping routes need to be incentivised, recognising that such routes are in competition with road and rail alternatives. The Commission

should investigate why there has been no take up of existing initiatives such as Marcopolo and Motorways of the Seas in some maritime Member States such as Ireland. It is recommended that the Commission initiate a dialogue with such Member States to understand better the barriers to effective take-up of existing instruments. In particular, are existing instruments fit for purpose? Why are such instruments not facilitating investments in port capacity, intermodal facilities at ports and in incentivising enhanced shipping connectivity?

- **Public transport (urban and rural) and encouraging sustainable travel**

The document is rightly encouraging of the need to promote public transport. The issue of funding remains unclear, however, although several possibilities are raised in the document.

It is positive to note that accessibility of remote regions and integration must remain a high priority of transport policy. Ireland is a small island economy with a dispersed population. The current bus network provides a level of social inclusion for people enabling them to travel across this network of routes. Unfortunately this can be diminished if it is not carefully managed in a market with growing competition and an increasing focus on more direct services between bigger towns. It is important that the level of integration is maintained and not undermined to ensure that accessibility to remote regions is ensured and further developed.

We agree that with regard to urban transport, the principle of subsidiarity limits the EU role. But we welcome the proposal for Community promotion of demonstration projects and best practice guidance in delivering sustainable urban transport.

- **Planning and prioritising investment**

While we support the emphasis on carefully planning and prioritising transport investment, the paper proposes common data collection methodologies and assumptions for policy planning and design across modes and potentially across countries. In developing these, the EU should take consideration of the differing level of resources available across MS, and we would recommend a light-touch approach.

- **Internalisation of External Costs**

The paper reiterates the lack of internalised costs across the transport sector, and highlights the potential for such a system covering HGVs, and the potential for reinvesting funds in infrastructure. We would welcome the Commission developing further guidelines/ limits for internalisation of external costs, but there

remains a question mark over how this integrates with domestic taxation matters, rather than community-competence.

Although the need to internalise the external costs of transport is highlighted, there is no reference to the importance of maintaining the geographical and territorial cohesion of the EU in the Commission's paper. The process of internalising the external costs of transport, without consideration of spatial planning at a European level, could encourage migration of transport related economic and social activity from peripheral Member States to Member States in the centre. The absence of a 'cohesion adjustor' in internalising the external costs and thereby penalising Member States for geographical disadvantages distorts the internal market and undermines the cohesiveness of the Union itself.

- **Technology**

Ireland welcomes the emphasis on use of technology in pursuit of transport policy objectives. However it is important that in deploying technology the driver remains transport policy. A 'technology-led' approach focused on economic development with select industry stakeholders of *defacto* proprietary systems is protectionist, stifles innovation and undermines both transport policy objectives and European competitiveness. Such an approach does not result in a sustainable transport system that meets society's needs.

A market-based approach to innovative technology based on open and common standards from multiple industry sources can best result in enhanced take up and deployment in the Member States. Multi-vendor open source technology can best influence the transition to a low-carbon society and lead global innovation. Ireland calls for more EU intervention in facilitating not only standard setting but more importantly the use of resultant open standards by technology providers and users. A Regulation of technology should only arise to make transport safer, greener and more efficient in instances where market failure has occurred. Such regulation should be focused on remedying defects in the Single Market caused by lack of interoperability and due to inconsistent approaches to standards and market access in the Member States.

The opening up of transport infrastructure on the TEN-T to allowing operational tests and field trialling of innovative technology should be encouraged. All too often road, rail, airport and port authorities are resistant to partnering with industry on trialling of new technology. Such authorities often cite safety and security concerns as excuses for their lack of engagement with industry. This can stifle innovation and undermine economic competitiveness. Such authorities are often the beneficiaries of public funds at Member State or Community level to assist with infrastructure improvements. Consideration could be given to conditioning such state aid on the extent to which such authorities have opened up their transport networks to trials and operational tests.

It is important that Europe harnesses the benefits of technology developments and innovation from not only 'major industrial stakeholders' but also from micro, small and medium enterprises. Funding to support innovation, research, development, demonstrations and field-testing on matters of relevance to transport policy should be targeted at micro, small and medium enterprises as much as at large industrial conglomerates.

- **Europe's role in global arenas**

With regard to the possibility of the Commission pushing towards "one voice" from the EU in international arenas, it is not evident to Ireland that this is a necessary progression.

There are currently a number of coordination measures in place between the Commission and Member States with regard to matters in which there is a Community interest. These range from the coordination of a Community position in advance of ICAO Council meetings to the introduction of a mechanism to promote the consistency of responses to ICAO State Letters from Member States, where issues referred to in such State Letters touch directly upon Community legislation. Such measures are functioning well, and Ireland believes that there should be no change which could potentially impact on the sovereign rights of Member States as Contracting States to international conventions. The Community should only aim to become a member of multilateral agencies and organisations where a clear consensus exists among Member States in favour of the need for such membership.

Scientific data inform us that Europe's oceans and seas are physically, economically, socially and biologically different. A "one-size-fits-all" policy is clearly neither appropriate nor desirable. This fact must be recognised in emerging policies and strategies. Regional development must be based on a better understanding of regional peculiarities, differences and aspirations and must provide a degree of flexibility to meet local needs and aspirations. EU citizens will be better served by policies which consolidate European unity, while respecting and providing space and diversity".

The principle of subsidiarity, "delivering power to the level most able to deliver", is well established within the EU, allowing Member States to implement strategies most suitable to local conditions. Ireland recommends that subsidiarity continue to be placed at the heart of European aviation and maritime policy.