

Date 24. september 2009

International Division

Response from the Danish Government
to the Commission Communication:

A sustainable future for transport: Towards an integrated,
technology-led and user friendly system
(KOM(2009)279)

The Danish Government welcomes the Commission communication concerning a sustainable future for transport as a comprehensive and constructive basis for the further debate on this important issue.

Denmark agrees with the basic view that transport is a network industry consisting of a large number of elements and that the relative strengths of each transport mode must be fully exploited in order to obtain an efficient comprehensive transport system and at the same time reduce congestion, emissions pollution and accidents. An efficient interaction between all stakeholders is necessary to secure transport flows for the benefit of the industries and the European citizens.

Denmark notes with satisfaction that key issues in the Communication are an efficient infrastructure, reduction of the impact from transport on the environment and exploitation of the technological development.

However, as far as maritime transport is concerned the Communication lacks the basic views from the Commission Communication on a maritime transport policy 2018, including the need for a regulation based on international standards, securing the competitiveness and to maintain the necessary competences and market access outside Europe.

It is essential that the future transport policy of the EU contributes to creating a green transport system, which at the same time secures mobility and reduces pollution and other negative impacts from transport. These impacts must be reduced in such a way that the economic development is not limited. In many cases a more efficient exploitation of the capacity across transport modes will also improve mobility, reduce environmental strains and strengthen the economic development.



Denmark shares the concerns about the continuing increase of CO₂ emissions. Denmark welcomes the view in the Commission Communication that the transport sector must also contribute to the EU targets of a reduction of green house gas emissions with 20 % by 2020 compared to 1990. The target for CO₂ reduction is expected to be sharpened in the coming years. The political transport agreement between a broad majority of the parties in the Danish Parliament is expected to turn around the development for transport and secure less CO₂ emissions in spite of a traffic growth.

A well functioning transport sector based on basic principles as market opening and competition and mobility is a precondition for a modern society and a sound economy. At the same time negative impacts like congestion, noise, CO₂ emissions, air pollution, loss of biodiversity and fragmentation of landscapes must be dealt with.

Initiatives, which contribute to securing a future sustainable transport system must be promoted, including initiatives which limit both air pollution and noise in cities and CO₂ emissions from transport. It is the Danish view that it could be considered if other sectors than aviation, including e.g. land transport, should be included by the emission trade scheme for green house gasses. It will however be necessary to analyze administrative, financial and competition consequences before such a decision is taken. As far as CO₂ emissions from the maritime sector is concerned it is the Danish view that a global reduction target should be adopted at the COP 15 in December and that global, binding instruments for regulation of the CO₂ emissions from the international maritime trade should be developed and adopted by the UN maritime organisation IMO. Environmental subsidies and open standards are also relevant instruments.

The volume of goods transport within the EU is expected to increase substantially in the coming decades. In order to deal with this increase it is essential that the share of goods transport by railway and maritime transport becomes significantly bigger than it is the case at present.

A high quality public transport is also necessary to make travellers change from cars to public transport as one instrument among others to reduce congestion on roads, environmental strains and CO₂ emissions from cars. Denmark recommends that political aims concerning the capacity and the quality of public transport are given high priority. In Denmark it is the aim that public transport shall cover most of the future growth in passenger transport.

Denmark agrees that good national planning can secure better accessibility and reduce 'forced' mobility as a consequence of service functions and urban scattering.



Denmark welcomes the assessment in the communication regarding the need to accelerate technological improvements aiming at a transition to a low-carbon transport sector. Given the increasing number of ongoing activities and initiatives in the EU – especially regarding electric vehicles - Denmark believes that building up knowledge through research and development, best practice etc. should be accompanied by initiatives on dissemination at EU level. Further the EU should aim at adoption of standards concerning vehicle technologies with alternative propellants, e.g. electric cars. There is a particular need for standards concerning loading, including intelligent loading of electric cars.

It is also the Danish view that the application of green road pricing should be promoted. Road pricing should be used to reduce congestion, promote the use of environmentally friendly vehicles, reduce CO₂ emissions, air pollution and congestion and in order to transfer journeys from cars to public transport where attractive public transport is available for transport users. The user charges collected should reflect the costs to the society including environmental strains and congestion costs caused by all road users.

Furthermore the development and the application of intelligent transport systems (ITS) should play a significant role within all transport modes in the future transport policy.

An efficient interaction between transport modes (co-modality) is necessary, in particular between maritime transport and land based transport modes. It is therefore particularly important to optimize nodes, which connect different transport modes (ports and terminals).

Within the framework of transport networks the individual transport modes must be developed and used to their full potential, including road transport, which will continue to be a dominant mode in particular on shorter distances. It is therefore important that heavy goods vehicles are as efficient, safe and environmentally friendly as possible.

Reports have shown that in particular on longer distances modular vehicles, which are larger than traditional heavy goods vehicles benefit both the environment and the safety. Denmark therefore encourages pilot actions for the use of modular vehicles in international goods road transport. Denmark also believes that a general assessment should be made of the need for amendments of the Community rules for weight and dimensions for road transport.

Denmark also supports further liberalisation of road transport cabotage in order to increase efficiency and limit empty runs.



In order to increase efficiency in the international road transport sector it is also considered necessary to harmonize the rules on weekend bans for heavy goods vehicles within the EU.

The Danish Government also stresses the importance to include the infrastructure policy of the EU (the TEN-T programme) in the future transport policy to be developed in the coming White Paper. In this regard it would also be appropriate to consider PPP models as a suitable financing instrument.

In order to reduce the number of killed and injured on the European roads the promotion of road safety must also be an important element in the future EU transport policy.

As far as protection and development of human capital is concerned it is important to maintain a wide field of instruments, which also includes the possibility to regulate wages and working conditions by agreements between employers' and employee's organisations as it is the case in e.g. Denmark (the so-called 'Danish model').

Denmark agrees that Europe shall maintain its prominent international role within the maritime area. Already today a EU coordination takes place prior to meetings in the IMO, and coordinated views are communicated in areas with Community competence. It continues to be important that the individual member countries can act individually in the IMO and preserve the possibility to take bilateral contacts trying to promote a global consensus on views for the benefit of safety and the environment at sea. Against this background Denmark recommends to preserve the present model for EU action in the IMO.

Finally Denmark agrees that information systems are important in overseeing transport chains involving several actors. Transport documents should, however, continue to be based on global rules (the UNCITRAL Convention) and it must be possible to operate on the basis of unimodal transport documents.

The Danish Government looks forward to the further discussions on the future transport policy of the European Union.