

## RESPONSE FROM THE UNITED KINGDOM

### A sustainable future for Transport: Towards an integrated, technology-led and user friendly transport system

#### Introduction

1. The UK welcomes the opportunity to respond to the Commission Communication 'A sustainable future for transport: Towards an integrated, technology-led and user friendly system'. The next Commission White Paper will cover a crucial period in the history of transport across the EU and globally. The UK looks forward to working closely with the Commission, European Parliament and fellow member states in Council to shape the development of the White Paper.
2. This response has been informed by the responses received to a UK public consultation on the Commission Communication. Respondents have been encouraged to submit their full responses to the Commission directly as well. A summary of UK responses has also been submitted to the Commission consultation and can also be found on the Department for Transport's website at <http://www.dft.gov.uk/consultations/>.

#### Executive Summary

3. The UK agrees with the Commission that the next White Paper will have to address serious and complex challenges and looks forward to working closely with the Commission, European Parliament and fellow member states in Council to shape the development of the White Paper. This Executive Summary outlines the themes of the UK vision. It also outlines the key principles that the UK would expect to see reflected in the next EU White Paper and the proposals that result from it.

#### *Future transport challenges: the UK vision*

4. The UK strongly believes that the greatest challenge facing transport, not just in the next ten years but in the next forty years and more, **is tackling the harmful effects of climate change whilst supporting economic growth**. There is a growing urgency for the transport sector to mitigate its negative impact on the environment. The sector has greatly increased its activity while making insufficient progress in reducing its energy and GHG intensity. In the EU, compared to 1990 levels, in no other sector has the growth rate of greenhouse gas (GHG) emissions been as high as in transport.
5. Moving to a low carbon economy and transport system presents huge opportunities; not just for climate change but for Europe's prosperity, health and the wider environment. Transport underpins our quality of life and economic prospects and we want to give Europe's citizens and businesses more low carbon choices about when, where and how to travel, or to transport goods. If we get this right, by 2050 we can expect to see a fundamentally changing transport system.

6. The most significant challenge for transport though is not only to reduce transport's emissions of carbon dioxide and other greenhouse gases but to also support economic prosperity. As Europe recovers from the impact of the economic downturn a properly functioning single market, with a liberalised transportation system at its core, will be vital for the people of Europe and for Europe's position globally. The Single Market is a unique asset for Europe, worth over €12 trillion and the largest in the world. Europe's citizens jobs, quality of life and public services depend on a fully functioning and fairly regulated single market. Europe's businesses rely on the single market to move goods efficiently and effectively and to compete for opportunities to grow their companies into world leaders. **Open and dynamic global markets will drive growth, jobs and innovation across Europe throughout the period of the next White Paper and beyond.**
7. The Commission should therefore put at the heart of the next White Paper the long-term challenge of **moving rapidly to a low carbon transport system whilst implementing a fully liberalised and integrated single market.** The EU is making great strides in creating a barrier-free internal aviation market and must consolidate that progress and replicate those successes in achieving a single rail market. In exploring possible policy options, technology has a significant role to play, as the Communication identifies, but as part of clearly defined and rigorous goals.
8. The UK agrees that a well maintained and fully integrated network is vital to ensure growth and the cost-effective transition to a low-carbon economy. The **UK therefore looks to the White Paper to promote the development of key low carbon infrastructure.** The Trans-European Network-Transport (TEN-T) also has a vital role in creating a truly multi-modal network, introducing real co-modal solutions to problems such as congestion and rising carbon dioxide emissions. EU funding should focus on EU value-added projects and develop integrated transport systems that the market cannot provide.
9. Given the regulatory role of the EU, the Commission, European Parliament and the Council of Member States should commit to creating a regulatory environment that allows businesses to prosper **through smarter regulation, taking into account the economic, environmental and social impact of regulations.** Regulation should be risk based, proportionate and non-regulatory approaches should be used wherever possible.
10. Respondents to the UK public consultation broadly supported the wider trends and challenges identified in the Commission Communication. In addition to those identified though the UK would more strongly emphasise the need to ensure that **citizens and businesses should have confidence in the security of Europe's transport system.** Security is about people's safety, but also about preventing terrorists disrupting Europe's economy. The Communication currently has limited references to the ongoing need to ensure that Europe's citizens and businesses should have confidence in the security of Europe's transport system.
11. Implementing the single market means ensuring that all people and goods are able to move freely, safely, securely and efficiently throughout Europe. The Communication rightly highlights successes in road safety policy but across all modes ensuring the **safety of the EU's travelling citizens must also remain a**

**key priority for the next White Paper.** The White Paper offers an opportunity to build on road safety policy by providing evidence led policies and targets to deliver a further reduction in deaths on EU roads. Any policies must however be proportionate, effective and concentrate on areas where the EU can add most value.

12. Transport is also about improving the quality of life for transport users and non-transport users. To that end a key challenge domestically, but also throughout Europe, is to radically improve the attractiveness of public transport by facilitating far more door-to-door journeys wholly in part by public transport. Transport needs to promote greater equality of opportunity for all citizens, with the desired outcome of achieving a fairer society. This means **putting the citizen, as consumer and passenger, and business at the heart of European transport policy not just for the next ten years but beyond.** The success of Europe's transport system is after all reliant on Europe's citizens as its customers so their satisfaction is vital and must be at the fore of policy development. However, requirements placed on operators of all modes of transport must be proportionate, practical and add-value to the systems we already have in place enabling operators to grow and flourish.

#### *6 Key principles for the EU Future of Transport Policy Review*

13. Taking the key aims set out above, the UK would expect any future White Paper proposals to be guided by the following overarching principles:
  - **Leading the World in the rapid transition to a low carbon economy and transport system** by implementing policies like Aviation emissions trading and an ambitious but achievable target on New Van CO<sub>2</sub>.
  - **Delivering significant EU projects, such as SESAR and Galileo, through to implementation on time and budget,** making full use of programme and project management techniques and ensuring Value for Money.
  - **Creating a regulatory environment that will allow the EU's business to prosper and the EU's citizens to move freely and efficiently throughout Europe** using truly liberalised and competitive transport operations across all modes including realising the vision of a single rail market.
  - **Acknowledging the vital role that transport plays in wider environment, energy, trade, regional, and other EU policy** ensuring that the Directorate Generals are joined-up in discussions and policy-making, and by making best use of impact assessments to meet the challenge of balancing competing objectives.
  - **Driving innovation through R&D and setting standards that are technology neutral, create investor certainty and deliver clearly defined and rigorous goals.** Within each mode, move the EU as fast as it is economically, socially and technologically viable to lower carbon options. Providing information and raising awareness about the benefits of behaviour change.
  - **Recognising the potential economies of scale and weight of influence that EU level action can deliver whilst respecting subsidiarity** and the differences between Member States and between transport modes.

## **Priorities for Action**

14. Respondents to the UK consultation were concerned that there was a general lack of direction in the Communication and only limited policy instruments. The policy objectives were greeted with broad agreement but as one respondent stated there is a lack of consideration of what this actually means. The Communication is about stimulating debate and the UK welcomes that opportunity. However, the UK is also keen to work with the Commission as it begins its new term, the recently elected European Parliament and with its fellow member-states to identify now, and over the next year, the vital priorities for action.

## **Leading the pace of change to a low carbon economy**

15. As Europe looks to reduce transport emissions there is inevitably uncertainty looking as far ahead as 2050 but that thinking needs to start now. The picture for the next ten years is clearer and the route map to getting there more clearly defined. In agreeing the climate and energy package and a regulation on New Car CO<sub>2</sub> and including aviation in the EU Emissions Trading Scheme (EU ETS), Europe has shown clear leadership to the rest of the World, that there is a need to act now and move decisively towards a decarbonised transport system.

16. The development of the next White Paper, with low carbon priorities as a central theme, will have a critical role to play in continuing that progress, keeping Europe on the right route map and helping to ensure global solutions on aviation and maritime emissions are put in place. The transition to a low carbon economy is long term and necessitates long-term thinking by the EU. The actions taken now and set out by the Commission in the next White Paper will be absolutely critical to success.

## ***Using market-based measures to encourage a shift to lower carbon transport: Emissions Trading***

17. The UK believes that emissions trading systems are particularly relevant to international emissions, such as those from aviation and shipping. These sectors operate across international borders and serve global markets and consequently we consider that action is best taken at international level to address them. This is why we are pressing for agreement on global sectoral targets for international aviation and shipping in the global deal being negotiated at Copenhagen.

18. The EU has a vital role to play in ensuring that international aviation and maritime emissions are included on a sectoral basis in the global agreement at Copenhagen. And the next White Paper must pick up on the outcomes of the Copenhagen agreement, setting out the implementation measures. The White Paper must build on the foundations laid by the landmark agreement on the inclusion of all flights arriving at and departing from European airports from 2012 in the EU ETS. The Commission must also ensure that there is a strong, supportive and unified EU position on the implementation and protection of the EU Aviation ETS from 2012, and that the EU will respond robustly to any legal or political challenge to its validity.

19. We are also keen that there is international agreement on the reduction of maritime emissions, either through the International Maritime Organization (IMO) or the

United Nations Framework Convention on Climate Change (UNFCCC), thus binding the shipping sector into a global approach for tackling climate change. Both approaches will require considerable effort in building international consensus and collaboration with the EU needing to support UNFCCC agreement and all member states needing to agree in the IMO.

20. With regard to maritime emissions, the UK supports the contingent approach agreed under the EU2020 package. This sets out that if there is no international agreement through IMO or UNFCCC by 31 December 2011, then the Commission has the authority to make a proposal to include international maritime emissions in the Community reduction target from 2013. The next EU White Paper must pick up on the outcomes from global discussions so that once again Europe will lead the way in implementing and enforcing international aviation and maritime emissions agreements.

#### *Supporting a shift to new technologies and fuels*

21. Emissions from cars and vans represent a significant share of the road transport total. In the UK for example cars accounted for 58 per cent of all GHG emissions from domestic transport in 2007. The EU has a key role to play in delivering a transformative shift to low carbon transport by 2020, maximising the potential of technology to reduce substantially emissions from cars and vans.
22. The next White Paper needs to set and deliver the ambitious framework for CO<sub>2</sub> reduction that will help shape the market and send a clear signal to industry about the pace of change that is required. Regulating in this way can play a critical role in supporting the transition to low carbon vehicles by establishing a clear, long-term framework for action by industry.
23. The UK was a strong supporter of the targets adopted in April 2009 that will mean that by 2020 the average CO<sub>2</sub> emissions from new cars across the EU will be 95 g/CO<sub>2</sub>/km – a 40 per cent reduction on 2007 levels. The existing New Car CO<sub>2</sub> regulation is, and must be seen as, a milestone on the path towards the decarbonisation of passenger cars rather than an end goal in of itself. Going forward the next White Paper will need to consider the further steps required to decarbonise passenger cars, including the review of the New Car long term CO<sub>2</sub> target. This review must be completed no later than 1 January 2013 but we would like to see the White Paper signalling the Commission's intention to make an early start on this work. The earlier the parameters of the long term target are defined the greater certainty industry has and the more likely the regulation is to deliver the maximum CO<sub>2</sub> savings possible. A recurring theme in the UK response is that the next White Paper should see through the policies that the Commission has already initiated.
24. The UK will be equally determined to ensure that an ambitious but achievable framework for long-term emission reductions is applied to vans. In the UK, vans contributed 11 per cent of domestic transport emissions in 2007 and represent the fastest growing sector of motor vehicles usage. The UK supports regulating emissions from new vans and looks forward to the Commission publishing its proposed regulation soon. The UK intends to play an active role in taking forward this important regulation. The next White Paper will need to pick up on any

agreement reached, in particular the implementation of clear targets for the medium and long-term and the delivery of mechanisms that will encourage the development of the ultra-low carbon van market.

25. The New Car CO<sub>2</sub> Regulation, and its successor regulations, provides an incentive for the automotive industry to produce increasingly lower CO<sub>2</sub> cars, as would an equivalent regulation for vans. However, such vehicles are significantly more expensive to develop and produce, with the increased cost being passed on to motorists, whether private, public or commercial. The governments of the major economies, including those in the EU, have all recognised that measures must be taken to help reduce the cost of:
- research, development and demonstration of new innovative vehicles, powertrains and fuels;
  - installing the supporting refuelling infrastructure; and
  - vehicles to consumers until a true, affordable, mass-market develops
26. On this basis, the UK would support accelerating access to EU research funds for the development of electric and other ultra-low carbon vehicles. In addition, simplification of EU state aid rules, and broadening of scope, would encourage state and industry investment in the automotive sector, its supply chains and the supporting refuelling infrastructure.
27. The transition to ultra-low carbon vehicles provides the UK and the rest of the EU with an opportunity to reinvigorate and maintain the European automotive industry and its supply chain. With regards to the supply chain, the EU as a whole has to decide if the supply chain should be commoditised, or if it will make strategic investments in this area. The Commission should consider how the EU, acting as a whole, can help support the development of the supply chain in Europe and ensure its competitiveness with other regions such as the US and Asia.

### ***Sustainable biofuels***

28. The UK is committed to ensuring that transport fuels are cleaner, greener and less carbon intensive. Once again the EU has already led the way, acting decisively with the agreement on the climate and energy package, with biofuels being expected to play a key role of its delivery.
29. Despite their potential to achieve emission savings of 338-371 million tonnes of global CO<sub>2</sub> each year compared to fossil fuels, biofuels risk displacing existing agricultural production if they are not produced sustainably, which in turn may drive deforestation and the loss of biodiversity and ecosystem services. We will therefore encourage the new Commission to monitor the effective implementation of the mandatory sustainability criteria for biofuels, including further developing these over time as to drive higher green house gas emission savings and close any potential loopholes in the criteria.
30. The UK also believes that it is now critical for the next Commission to develop a robust methodology to account for the impact of indirect land use change on greenhouse gas emissions by December 2010, as a way to minimise the indirect impacts of biofuel production. The UK believes this is of paramount importance in

order to provide investor certainty and ensure the long term sustainability and viability of biofuels to 2020 and beyond.

31. And lastly, the UK would like the Commission to provide assistance to member states in overcoming some of the barriers associated with the deployment of biofuels at the scale needed to meet the 2020 targets, such as current vehicle fleet capability with higher blends.

### *Air Quality*

32. In addition to the long term challenge to improve the environmental performance of transport an immediate task will be to meet air quality limit values and noise obligations. Road transport is a key source of pollutants at many roadside locations in the UK and throughout Europe. The next White Paper will need to continue to consider appropriate measures to improve air quality. Consideration should be given to measures which can make a contribution to the reduction in the levels of harmful pollutants, for example, encouraging sustainable travel such as cycling and walking.

### *More fuel-efficient operations*

33. More efficient operations offer the prospect of a “win-win”, with the potential of both CO<sub>2</sub> savings and cost savings arising as a result of lower fuel consumption. Air traffic operations are challenging to achieve as they require international co-ordination across the industry as a whole. Nonetheless, the Commission has already estimated that improvements in air traffic management, allied to those in airport operations, could achieve reductions in emissions per EU flight in the range of 7-12 per cent by 2020, mainly as a result of more direct routes and reduced delays.
34. The White Paper must deliver the realisation of the Single European Sky performance scheme, setting and enforcing robust targets and thereby achieving significant emissions reductions. The Commission must also work with member states to ensure delivery by the SESAR Joint Undertaking (PPP) of the development phase of the project, keeping first deployment of the resulting technology on track for the end of the five year term and achieving additional efficiency gains. Respondents to the UK consultation, supported the current policy instruments to tackle the environmental challenge but urged caution at adding any further policy instruments in this field at this time.

### *Internalisation of external costs*

35. The communication reflects on the earlier proposal by the Commission to introduce a stepwise strategy for the internalisation of external costs in all transport modes. The principle of internalising externalities was met with a mixed response in the UK consultation with more negative responses expressing uncertainty about what the Commission’s strategy actually was.
36. Nonetheless, the UK broadly supports the principle that user charges can reflect external costs such as those relating to environmental, noise and congestion impacts. We would however want to look carefully at the manner in which it is proposed to cover external costs for any mode should this be considered in the future. The UK was a keen supporter of the proposal to include Aviation in the EU

ETS and in principle to the inclusion of externalities in the revised proposal on charging for heavy goods vehicles. The UK would urge caution though that the Commission should not over-legislate in this area; and note the need to respect subsidiarity. In addition, the UK believes that the use of revenues is a matter for member states.

### **Leading by example: Opening markets and resisting protectionism**

37. As Europe recovers from the effects of the economic downturn the importance of a fully functioning and properly regulated single market cannot be underestimated. Transport is at the heart of the success of the single market, providing Europe's citizens with the capacity to move freely in the search of opportunities. And the single market is even more crucial to business when operating as a fair level playing field offering opportunities for growth and trade. The ability of business to move goods across Europe efficiently and at low-cost and to compete for opportunities to grow their businesses is vital to their success in the face of global competition. The UK endorses the Commission's increasing focus on better regulation. Focussed and fully costed regulation that avoids unnecessary burdens is crucial to the success of the single market. The next White Paper should therefore couple the transition to a low carbon economy with initiatives that will complete the single market and ensure open and efficient competition.

38. The Trans-European Network-Transport (TEN-T) system has a vital role too in connecting modes and integrating the market. To deliver genuine value for money, the ongoing review of the TEN-T Guidelines, which should feed into the next White Paper, should lead to a truly multi-modal network, introducing real co-modal solutions to problems such as congestion and rising carbon dioxide emissions. The TEN-T priority axes must be adequately integrated. This calls for the optimal interconnection of modes, for example, through hinterland connections to ports or through railway connections to airports enabling major freight and passenger traffic flows to cross the European Union as efficiently, economically and with as low an environmental impact as possible.

39. This kind of approach would underpin a strong TEN-T network integration, improving not only the EU competitiveness, but also allowing key European links to generate additional value such as reducing congestion problems that have a negative impact on the overall transport emissions.

### ***Delivering open competition and market opening: Rail***

40. In the UK the decision to establish the High Speed Two company, and ask it to recommend a north-south high speed rail plan by the end of 2009, represents a highly significant infrastructure announcement. The UK believes that a global transport policy revolution is taking place as country after country adopts high-speed rail as its next generation backbone infrastructure. Many of our European neighbours – France, Germany, Italy, Spain, Belgium and the Netherlands – are all far beyond us in the relative scale of their high-speed rail networks. In Europe alone, 3,600 miles of high-speed line are in operation, a further 2,000 are under construction and 5,300 planned.

41. The need for sustainable additional transport capacity between Britain's principal conurbations is a domestic one. However, the need to create sustainable additional transport capacity, the potential to substitute lower carbon and more convenient trains for planes and cars; the potential for getting far more freight off the roads and onto rail and the potential wider social and economic benefits are all pan-European themes.
42. The UK believes that the next White Paper should promote sustainable transport links that are of strategic interest to the Community. The successful transition to a low carbon economy requires investment in sustainable infrastructure that provides the necessary rail network capacity to support transport modal shift objectives. There are also opportunities to improve the carbon efficiency of the existing network and for new infrastructure investment to be delivered with lower carbon objectives in mind, such as rail electrification and high speed rail. In the current economic climate it is imperative that the EU and Member States work closely together to maximise all EU funding. EU funding support to the development of an integrated network should be focussed on priority projects and combined with EIB loan and private finance when it represents the most cost-effective means of delivery.
43. As the Communication rightly identifies, the provision of new capacity is costly so there is a need to make optimal use of existing facilities. The UK is therefore keen that the next White Paper enhances competition and market opening in the rail sector by ensuring that there is proper compliance with existing legislation, like the 1<sup>st</sup> Railway Package, and by reviewing existing legislation and clarifying and strengthening this where necessary.
44. The UK supports the progress made towards interoperability of Europe's railways with the goals of improving the competitiveness of the railways and reducing the barriers to the through operation of trains throughout Europe. The UK believes interoperability can help deliver benefits of standardisation through economies of scale for railway components, while improving the economic performance of European railways and the environmental performance of the whole European transport system. However, interoperability standards must be grounded in robust evidence based policy with specifications which are cost-effective for the rail industry and its users.
45. Respondents were uncertain about the nature of "the possible creation of transnational infrastructure managers", a suggestion made on page 16 of the Communication. Overall the UK response is that this is premature and we would prefer to support an approach which is in accordance with subsidiarity.

***Delivering open competition and market opening: Aviation***

46. As with the rail market the UK wants to see the next White Paper continue to consolidate the successful barrier-free internal aviation market by ensuring strict adherence by Member States. This should focus on adopting a harmonised approach where possible to the implementation of EU laws at national level and by reviewing and simplifying EU legislation and regulation wherever possible.

47. The inclusion of aviation in the Emissions Trading Scheme is an important step towards recognising the impact aviation has on the environment. The development of the Single European Sky and SESAR project will provide the industry with economic and environmental efficiencies. Continuing to expand the list of States with which the EU has liberalised air services and leading World thinking on liberalisation of services and investments in the aviation sector should remain a key element of the policies set out in the next White Paper.

### *Galileo*

48. The White Paper should prioritise the need to deliver Galileo open service to users by 2013 to allow development of applications in diverse fields, not just transport, so that the economic and social benefits of the system can be fully realised for all EU citizens. There is a need to also ensure that Galileo and EGNOS are developed to be integrated and interoperable with other GNSS systems and other technologies to give European systems the accuracy and resilience needed. Delivery should be within the financial envelope agreed by Ministers in 2007. Effective programme management and regular scrutiny will be vital in order to keep to the expenditure cap and ensure that cost overruns are avoided and not deferred to future phases of the programme.

### *Implementing properly considered and costed technological solutions*

49. The Commission Communication identifies technology as being at the fore of future developments. There is no doubt that technology is part of the answer. The next White Paper should champion low carbon technology and practice. For example the pace of development in new cleaner electric and hybrid technologies is rapid. The next ten years will see the increasing availability of electric and plug-in hybrid cars.

50. The key though is that the technology needs to be properly considered and costed. Technological solutions, like new Intelligent Transport Systems, must contribute to clearly defined and rigorous goals. In addition to carbon reduction, technology can play an important role in contributing to road safety objectives and provide wider economic benefits through congestion reduction. The UK therefore agrees with the Communication's assessment of the importance of technology but calls upon the Commission to use the White Paper to set out its contribution to clearly identified and thought through goals.

51. The UK agrees that standard setting will be an important tool for delivering the benefits of new technologies. Where pan-European interoperability is important for realising the benefits of such technologies, the UK would like to see a focus on developing open, performance-based standards which do not favour specific technologies. We also support the promotion of best practice including for example the use of real time information systems. The UK has considerable experience of investing in new ITS technologies, for example to help local authorities to manage their road networks better, and looks forward to sharing these experiences with the Commission and other member states as we make progress in this area.

## **A Secure European Transport system**

52. As the Communication identifies, albeit to a slightly limited extent, Europe's citizens should be free to travel without a threat to their personal security and Europe's businesses should be able to operate without threat to their operations. It is therefore critical that the next White Paper continues to develop policies that reduce the risk to EU citizens and to the transport infrastructure from terrorist attack either within or without the EU.
53. Europe has a key role to play in aviation security. The White Paper should provide the groundwork for the next Commission to develop and refine the common baseline standards to ensure that future decisions reflect the need to effectively align security measures to the threats faced. The current priority, and one that is likely to be relevant for the foreseeable future, is ensuring a proportionate security regime for liquids and gels going forward.
54. In maritime too, security measures need to be robust but also compatible with efforts to improve trade facilitation. The UK believes that it would be helpful for the Commission to use the opportunity of the White Paper to identify the long term role for the EU on tackling maritime piracy. The UK is a supporter of the EUNAVFOR programme and would wish to see the Commission engage in regional capacity building programmes during the period that the next White Paper covers (i.e. 2010-2020).
55. The EU must also continue to be at the fore in implementing practical solutions on freight security. The UK would welcome the reprioritisation of resources for continued investment in secure parking initiatives including funding through pilot projects. The EU should also continue to deliver and promote harmonisation for driver training through the inclusion of a photograph to the ADR training certificate for the movement of dangerous goods.

## **A Safe European Transport System**

56. As the Communication highlights it is also a fundamental right for Europe's citizens to be able to travel freely and safely. In this area the rail, aviation and maritime agencies all have a critical role to play in driving forward safety improvements. The development of the next White Paper therefore also offers an opportunity to clearly define the role and responsibilities of the Agencies – including the potential economies of scale that they can deliver. In doing so the Commission should recognise the different functions that they perform and the different requirements that come with this. The functions of the agencies vary from sharing best practice to performing regulatory tasks on behalf of, and instead of, Member States and this needs to be recognised in the way that they are regulated by the Commission.
57. The Commission has recently indicated its intention to enhance the role of the European Railway Agency (ERA). The UK believes there is a role for the ERA in supporting the Commission to enforce the correct and full implementation of EC rail safety and interoperability legislation and in proceeding with infraction procedures for non implementation of measures. We would support proposals to facilitate this role. Notwithstanding we would caution against any reactive changes to the framework governing railway safety which could obstruct the independence of

national safety authorities and investigation authorities. We look to the White Paper to set out the proposed future role of the agency.

58. Rail based respondents all emphasised the widespread safety measures that were already in place beyond those in existence in other modes. The UK therefore believes that the White Paper should enable the European Railway Agency to improve the competitive position of the railway. The safety of the railway is of course critical but the White Paper should define outputs on safety which are workable and responsive to the needs of the industry and the user.
59. Over the next year the next Commission will be responsible for ensuring that the European Aviation Safety Agency delivers a safety programme by the end of 2010. The safety programme should define clear objectives and targets for improving aviation safety, based on an analysis of safety data from all member states. The White Paper should put in place the measures that will ensure that the programme is properly delivered and implemented.
60. In maritime safety, the UK again emphasises the need for the White Paper to deliver on existing commitments with a focus on the effective implementation of internationally based regulation and recognising the global framework for maritime affairs. We support the European Maritime Safety Agency's role in overseeing the implementation of EU maritime safety regulation. It is also highly effective in carrying out its service provision functions on behalf of the member states. We would welcome proposals in the next White Paper that would continue to maintain these roles.
61. The Communication rightly highlights the significant improvements in road safety. The next White Paper must build on those developments by providing evidence led policies and targets to deliver a further reduction in deaths on EU roads whilst recognising the fundamental differences between member states. The EU should look to ensure that policies are proportionate, effective and concentrate on areas where the Commission can add most value.

### **An EU Transport System that provides equality of opportunity**

62. As the Communication rightly highlights, transport provides the EU's citizens access to many of their freedoms. Transport has a fundamental role in promoting equality of opportunity for all citizens, with the desired outcome of achieving a fairer society. It is therefore vital that the next White Paper promotes actions that help to deliver transport services that passengers want to use. Transport is about improving quality of life for all passengers and the White Paper must lead the way in ensuring that transport is accessible to all – including by reflecting the needs of an ageing population. Broadening the range of transport choices available is an important tool for delivering a fairer society. Quality of life benefits are also likely from policies which promote the development of sustainable travel solutions, particularly in urban areas – including by delivering health benefits, and reducing traffic volumes and noise. Respondents to the Communication also strongly emphasised that improvements to quality of service across Europe would also drive modal shift.

63. The Commission has already led the way with proposals on passenger rights. It is vital though that proposals like these respect the differences between modes of transport, are proportionate and cost effective and are practical rather than burdensome for operators.
64. The Communication also identifies influencing behaviour through education and awareness raising campaigns. The UK supports such campaigns as a way to influence future consumer behaviour and facilitate sustainable mobility choices such as encouraging the use of public transport and walking and cycling.
65. The Communication refers to the 'urban challenge'. The UK believes that any solutions proposed should not impose a single model on all member states in respect of urban transport as there needs to be flexibility to implement locally relevant solutions. The UK would be supportive of an EU role promoting best practice rather than legislative solutions.
66. The Communication also reflects the importance of transport as an industry employing many of the EU's citizens. In this area the UK believes that the EU should implement appropriate measures for the self-employed on working time for road transport workers. The UK is also keen that the development of a maritime strategy towards 2018 reflects the importance of the maritime sector to the European economy and fully recognises the international competitive pressures of a globalised industry, particularly with a view to increasing employment opportunities and career prospects for young people at sea and in land related based economic activity.

### **Next Steps**

67. The UK welcomes the Communication and looks forward to the opportunity over the next year to work with the Commission, European Parliament and fellow Member States in helping to shape the development of the White Paper. The UK response to the Communication is a first stage in that engagement. Respondents to the UK Public Consultation also provided views on the role of the Commission in delivering and implementing the next White Paper. Those responses have helped shape this high-level response. A summary of the main themes from the responses received has also been submitted alongside this high level response.