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To whom it may concern

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PUBLIC CONSULTATION ON THE EU COMMISSION COMMUNICATION ON A SUSTAINABLE FUTURE FOR TRANSPORT: The Volvo Group view

1. Executive summary & Introduction

The Volvo Group appreciates having the opportunity to hereby present its views on the forthcoming European Commission White Paper. We hope that the Volvo Group's experience and expertise can in any way contribute towards a policy for transport efficiency, environmental values, safety and competitiveness.

The Volvo Group's vision is to be valued as the world's leading supplier of commercial transport solutions. Our responsibility is therefore to provide society with energy efficient transport solutions that reduce the negative environmental impact and contribute to social development.

The Volvo Group, with about 90,000 employees, has production facilities in 19 countries and sells products such as trucks and buses in more than 180 markets. The Volvo Group's transportation and logistics company, Volvo Logistics, manage and operate the transports from 4000 suppliers to all the production facilities as well as the distribution of the vehicles to the markets. Consequently very complex global transportation solutions are required in which Europe has a dominant impact.

To make the European transportation more efficient and consequently Europe more competitive, the EU Commission White Paper needs strongly to promote;

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⇒ **Transportation and Logistics;**

The amount of goods is expected to grow significantly by 2020. To handle this growth more transport capacity will be needed – both longer trucks and trains. A policy that will support modal shift from road to other modes will not meet the demand for increased capacity. Despite heavy investments by the Member States in rail systems, road transport will need to absorb the major part of the increasing demand for transport. The overlap between rail and road transport is limited, a fact that is not always made clear in public discussions.

To meet future capacity constraints and increase transport efficiency the EU should promote;

- co-operation between rail, road and sea operators to facilitate a development towards totally integrated transport systems. For this purpose it is of highest importance with standardized and harmonized loading units.
- efficient cross border green corridors between nodes/terminals.
- solutions to utilize existing infrastructure better with;
 - Modular Concept (EMS) and thus the use of larger and more flexible trucks that can be adapted to local infrastructure circumstances.
 - longer train sets and harmonized standard for the length as proposed by the New Opera project.
- short-sea and coastal transportation (“Motorways of the Sea”)
- competition on equal conditions between different transport modes. All modes target different needs of transport and therefore all modes are needed. Routes and modes must be chosen to ensure that goods are delivered in the right condition at the right time to the lowest possible cost. The debate on “Modal shift” is not moving Europe forward and should not be supported.
- investments in European infrastructure by increasing the speed of the “European Bottlenecks Exercise” followed by investments programs agreed with the Member States.
- research and education in the fields of transport and logistics. The interest among young generations for transport and logistics has declined over the last decades.

⇒ **The transport vehicle & equipment**

development and use of larger transport equipment such as longer train-sets and larger trucks. Larger trucks would not only contribute to increased capacity and reduced congestion – it would also contribute to less emissions and improved safety

- adapted dimensions regulation and the use (how, where and when) of different vehicle combinations should be based on Performance Based Standards instead of strict over-all regulations.
- development of vehicle driveline such as hybridization and renewable fuels.
- transport security since the need has increased in the transport system.
- research and large scale demonstration activities related to road traffic safety. Adapt legislation (e.g. liability) and thrive for globally harmonized regulations.
- Active support for the ITS Action plan and further development of IT solutions to support inter-modal systems in terms of open IT platforms, e-freight etc within the framework of ITS.
- ICT-based transport applications need to be deployed on a large scale meeting both commercial and public needs
- research and development of techniques for more efficient handling and transfer of cargo between the modes
- incentives to promote the introduction of hybrid drive trains and electrification that leads to sustainable transport solutions

⇒ **Urban transportation and mobility**

- harmonized public transport and city logistics in order to reduce emissions in urban areas.
- Green city lanes to utilize network infrastructures in an efficient and safe way for coordinated urban transport of goods and people.
- “city micro-terminal” (i.e. urban consolidation centres) accessed through the green city lane with flexible opening hours.
- systematic approach to infrastructure and city planning, e.g. traffic lanes dedicated to bus and truck transport, Bus rapid transport systems.
- EU should aim for doubling public transport by 2030.
- harmonised city access restrictions for vehicles to reduce differences in technical demands on vehicles.

Answers to the Questionnaire

Please find below the Volvo Group's response to the Commission questionnaire and proposal of measures for a transport policy after 2010.

(1) Infrastructure. *What can the EU do to promote the integration of modal networks as well as their maintenance and upgrade? What should be the priorities for investment? Which measures would allow a better exploitation of the networks and a balanced use of the different modes?*

1.1 Expanding the infrastructure.

Already in the mid 80s', top industrialists of Europe formed "The Roundtable of European Industrialists" as "The need for Renewing Transport Infrastructure in Europe" was stamped as "High Priority". The issue was also of highest concern in the EU and has been a hot issue since then. Measures have been taken but the speed of change is far too slow and Europe is steadily going towards more gridlocks on the roads and in the rail systems – only "saved" by the present downturn in the economies.

To some extent EU has supported the rail systems but basically because of National responsibilities the development of the infrastructure for rail freight has been limited. The Volvo Group supports the EU ambitions for rail, as highlighted in the New Opera project, but is waiting for actions.

Regarding the road net-work we are currently facing a variety of bottlenecks of different nature and all have large impact on transport performance, citizen welfare and society prosperity which leads to EU competitiveness challenges. The speed of improvements has been far too slow and the severances have now reached an extensive level. Bottlenecks, whether they are of administrative, operational, infrastructure or technical nature, must have a high priority on the future agenda. Areas such as cross-border infrastructure, utilization of the capacity, increased utilization of the 24 hours, standards, single documents for different transport modes, longer vehicles and trains and IT support guidance will have to be prioritized. In urban areas the Volvo Group wants to stress the possibilities with dedicated freight/passenger lanes and urban hub concepts.

The Freight Bottleneck exercise initiated by EC in 2007 is a good example of ambition to stress the issue. However, the work with the Freight Bottleneck exercise seems to be fading out. To increase speed that hopefully will lead to decisions followed by investments, it is vital that the Member States are active and clear about their ambitions and take a responsibility that corresponds to an EU perspective.

The Volvo Group's view is that "Efficient cross border green corridors" concepts described below should be prioritized. In the Swedish Governmental Infrastructure proposition for 2010-2020 this approach will most likely be taken.

1.2 Utilization of the existing infrastructure

Utilization of the existing infrastructure will also have to be improved significantly. A step towards a more efficient use of existing infrastructure would be the development of "efficient cross border green corridors".

An "efficient cross border green corridor" approach between hubs/terminals in which rail, road and sea systems co-operate will be the fundament for utilizing the infrastructure in a more efficient way. Through specially adapted transport corridors for heavy duty traffic the impact on the environment can be reduced while simultaneously increasing efficiency and safety on highways. Additionally, applying "green corridors" and "green city lanes" described below, concepts in urban areas could also provide an excellent possibility to create a public transport system for both people and goods.

However, we also need to develop market and supporting business models in order to facilitate deployment. One way would be to differentiate the service levels of the "transport system" in a way that does not exclude any actor but provide financial incentives for the players (goods owner, forwarder, carriers) that make efforts (route choice, schedules, equipment, training etc) to comply with "green corridors"

The Volvo Group in cooperation with the Swedish Government's Logistics Forum has started an initiative of "green corridors concept" to realize the EU Commission's vision of enhancing transports by environmental efficiency. This is a full-scale pilot project, in cooperation with various stakeholders, including carriers, infrastructure owners and authorities. As a part of the project the Volvo Group will provide the field test with longer and more energy efficient EMS trucks, based on the European Modular System (EMS), compared to the ones running on some European roads today. The project enables even longer and heavier trucks based on the EMS which can transport goods using less fuel. The purpose is to try more efficient transport solutions, such as efficient reloading, more efficient vehicles, alternative fuels and smart IT solutions that take into consideration the interaction between drivers, goods, vehicles and infrastructure. The project will reflect an integrated transport concept in which road, rail and sea transports complement each other to enable more efficient and environmentally adapted transports. We believe EU should strive for and promote these kinds of concepts and we look forward to common EU legislations to promote "Efficient cross border green corridors".

As expressed in the introduction we also find Motorways of the sea as one of the most advantageous concept to utilize the present infrastructure. Motorways of the sea and short sea shipping need to be developed with an increased emphasis on landward connections in order to create better synergies between road, sea, rail and river, and integrate various transport modes in logistics chains. This will give the industry a competitive edge but also diminish the environmental impact per unit of freight

1.3 EMS & larger trucks.

Europe will need to introduce a wider and flexible use of the modular concept based on existing standardized units transported by longer vehicles. A Modular Concept and longer truck combinations would not only contribute to increased utilization of the existing infrastructure but also increase the efficiency in the European transportation systems and substantially reduce CO2 emissions per ton km. The concept is used in some Member States already and tested in others with proven only good experience.

For best efficiency, harmonization and competition neutrality, the Volvo Group promotes a vision to focus on the interaction in the infrastructure; axle loads, stability, sweep area, size of the loading units and the loading area length instead of the overall total length of a vehicle, by applying Performance Based Standard. By using existing standardized units and guidance of how they are allowed to be combined, an overall combination length will follow automatically.

An EU wide application of the Modular Concept is one of the most cost-effective ways to address all the different concerns, including CO2 emissions. The EU should in the revised White Paper promote the Modular Concept leaving aside possible national interests that may risk harming the general interest of the whole EU.

1.4 Hubs/Terminals /Trans-shipments centres

Hubs or transfer terminals have been a bottleneck in the total transport chain during the past decades - in respect of efficiency as well as capacity. The necessity to invest in these will increase further when "Efficient cross border green corridors" and "EMS & larger trucks" described above will be realized. Efficient reloading and transshipment solutions involve evaluating the design of vehicles, load bearers and reloading equipment.

Further development of the transfer points will be even more essential and the EU can support this by promoting research and demonstration projects exploring new concepts for co-modal hubs (sea/road/rail) which could significantly lower transshipment costs.

Tri-modal land hubs would provide fast transshipment for goods (but also for people) between rail, inland waterways and road services and could attract other commercial activities such as shopping, finance and office facilities. Reloading equipment and areas as well as container loading facilities are of importance. Standard loading units (worldwide) that are easy to move between modes both at large and small junctions should be promoted as well as communication technology, RFID, enabling pallets and cargo to remotely communicate their status. RFID is an ICT protocol for the remote tracking and tracing of freight consignments.

A network of intermodal transfer points of various size and reach would facilitate seamless transitions of cargo between the backbone of inter-connecting high ways and the regional networks. This could be done through a development of the basic ideas of existing “Euro platforms”, “Freight Villages”, “Güterverkehrszentren” etc.

1.5 ICT and ITS

To facilitate the development and use of what is mentioned above in “Efficient cross border green corridors”, “EMS & larger trucks” and “Hubs / Terminals”, IS/IT support systems will be a key element. There are different transport companies involved in the transport chain, often being competitors. To be able to plan for on-carriage etc the transport information (including e-freight for tracking and document handling) will have to be open to all involved in the process. Transport operators, terminals, authorities etc. Such an IT support platform might be possible to develop within the framework of ITS and it is essential that an intelligent IT infrastructure that enhances the efficiency of freight (but also passenger traffic) should be strongly supported by the EU.

The ITS action plan is an opportunity strongly supported by the Volvo Group. It is of key importance to work for trans-European deployment of a harmonized and interoperable platform for ITS services in the topics addressed in the action plan;

- Optimal Use of Road, Traffic and Travel Data, to generate personalized dynamic point-to-point traffic information for heavy goods vehicles.
- Traffic and Freight Management has an enormous potential with ITS applications in the commercial transport area for people and goods - in urban and large metropolitan areas and in green freight transport corridors. It is also of great importance to prioritize the work on a networked based information approach to realize the eFreight concept. Electronic road toll systems must be interoperable on a pan-European scale, including the in-vehicle systems and the administrative connection to the fleet management portals.

- Road Safety & Security, where the continued introduction of advanced driver assistance systems through a market driven deployment open for innovative solutions needs based on voluntary guidelines such as the ESOP.
- Integration of Vehicle and Transport Infrastructure, where continued trials of cooperative systems based on a cross-sector deployment plan based on global standards for communication.
- European ITS coordination, where the commercial vehicles should particularly be considered as early adopters of pan-European deployment of ITS services. The Volvo Group may play an active role safeguarding the interest regarding commercial transportation.

The “Connected Vehicle” is already becoming a reality. It will be important to safeguard an open ICT-platform that connects the main stakeholders in the transport logistics information chain to enable development and deployment of services building on the eFreight concept. The Volvo Group will take an active part in the development of this open ICT-platform for transport logistics.

1.6 Increased share of renewable fuels

The Volvo Group is a leading actor in the research and development for vehicle technologies that can use sustainable fuels. Vehicle technology can already today be demonstrated to handle the fuels that have a future potential both from a CO₂ perspective as well as from a security of supply perspective. As a step wise approach it is recommended to blend renewable fuels into fossil fuels. One important challenge for society is to produce and distribute the renewable fuels in a sustainable way.

- ⇒ The EU should support the development of production and refinement of renewable fuels such as DME and liquid bio-methane and facilitate tools for building the needed infrastructure to distribute the fuels.
- ⇒ The EU should support harmonization of global fuel standards for renewable fuels.

(2) Funding and pricing. *What can the EU do to ensure that prices in transport correctly reflect costs to society? What actions should be considered for implementing the ‘polluter-pays’ and ‘user-pays’ principles in transport? What should be done with the revenues thus obtained?*

The Volvo Group supports the polluter pays and the user pays principle applied to all modes of transport. A good example is the transport fuel taxation. However, a user pays principle needs to consider that:

- charges are representing actual costs
- charges are levied only once
- charges are balanced to other charges, taxes and fees
- all transport modes are treated equally
- tax etc should be technically neutral.

Regarding Road Taxation, the Volvo Group can accept its use for road transportation. However, the revenues should be invested back into the transport sector, transparency must be reflected and interoperability is necessary. The EU must secure fair competition.

The revenues from infrastructure charging should be used to benefit the transport sector and optimise the entire transport system. Revenues should for example be used to identify and eliminate bottlenecks in transportation system.

To make market introductions of advanced energy effective vehicles and vehicles adapted to alternative fuels there is a need for cooperation and action by national and regional authorities in introducing harmonized control methods and support in public procurement. One positive step in this direction is the EC Commission.

Proposal on clean vehicles. Different alternatives which lead to increased energy effectiveness e.g. hybrid vehicles and others making it possible to use bio-mass based fuels need to be evaluated on a technology neutral basis. Additional actions based on environmental credits, road charges, etc are of interest.

*(3) **Technology.** Many technologies are being developed or are already available to improve the environmental performance of transport, increase safety and reduce congestion and dependence on oil. What can the EU do to accelerate the development and deployment of these new technologies?*

The long-term vision for Safety is a road traffic system without any accidents. It is a fact that most accidents involve factors that are out of the control of the vehicle manufacturer. Therefore, cooperation with all concerned stakeholders in society will be needed to reach the vision of no accidents. Furthermore, many safety-related features will rely on the implementation of an ITS-based, modern and pan-European service infrastructure. The EU need to support research and large scale demonstration activities and to stimulate the market introduction of new safety technologies (e.g. by use of public procurement).

There is a potential in developing and deploying open standardized ICT-based smart management systems for transport of goods and people. These systems will be designed to offer functions and services utilizing all opportunities for

consolidating goods, filling up and minimizing the number of vehicles in operation. In addition to raising effectiveness and reducing energy use, emissions and congestion, new opportunities to improve availability are created.

There is a need for R&D and large scale demonstration projects. The solutions of the future have to encompass the “transport systems view” rather than isolated technologies and point solutions. EU can play a vital role in creating innovative environments but it will require that academia, authorities (local, national, EU) and industry can collaborate in large scale projects where the roads and city streets are the test sites rather than tucked into closed laboratories. Additional efforts for an easier access to EU R&D funds should be made in terms of simplification, flexibility, speed and in general avoiding superfluous bureaucracy.

The use of different kinds of financial incentives e.g. differentiated annual taxation, road charge, national premiums/subsidies for customers are efficient tools to promote the introduction of new technologies. However financial incentives are very strong instruments and should therefore be used in order not to distort technical development.

*(4) **Legislative framework.** What can the EU do to further improve working conditions, health, safety and security standards in transport and the rights of passengers? In which sectors should market opening be pushed forward and how? What measures of a regulatory nature should be considered to reduce the transport sector's environmental impact?*

For best efficiency, harmonization and competition neutrality, the Volvo Group promotes a vision to focus on the interaction in the infrastructure; axle loads, stability, sweep area, size of the loading units and the loading area length instead of the overall total length of a vehicle, by applying Performance Based Standard. With a clear identification of units that are allowed in a modular vehicle easy recognition of legal use is facilitated. By using existing standardized units and guidance of how they are allowed to be combined, an overall combination length will follow automatically.

There is a need for a comprehensive approach on safety and security in these fields which includes drivers, goods, vehicles, pedestrians, surrounding environments, etc. There seems to be a need for new mandatory measures for instance real time monitoring of dangerous goods and unprotected road-users.

An efficient legislative tool to open markets for new technologies and to promote the introduction of clean and fuel efficient vehicles is the requirement in public procurement. These should mirror both the regulated emissions, CO₂ and energy consumption and be harmonised on an EU level. The existing EU directive is a good start in this direction but must be changed into meeting these requirements fully.

The advantages of lower fuel consumption in hybrid vehicles should be reflected in laws and regulations. The hybrid advantages must be acknowledged by regulators and future customers. In order to introduce the hybrid technology the EU should promote incentive programs to support the early introduction.

*(5) **Behaviour.** Sustainability of transport also depends on sound planning and on a change in transport habits. Are there measures that can be taken at EU level to improve accessibility and modify transport needs and behaviour?*

In order for society to tackle the CO₂ reduction challenge there is a need for stimulating behavioural change on individual level as well as for enterprises and organizations related to public transport.

Volvo Commute Greener is an innovation that helps people to engage into better utilisation of more sustainable transports. With a 'CO₂ pedometer' that leverage already existing infrastructure it is possible to provide means and ends that stimulate positive actions. Initial studies show individuals achieving 30% reduction of CO₂ emissions within one month, just by getting aware of their daily travelling pattern. Even if the individual steps are relatively small there are giant leaps of results thanks to the scale that can be stimulated through the "Commute Greener".

*(6) **Coordinated action.** Effective action requires coordination between different levels of government: what can the EU do to facilitate this process and avoid inconsistent approaches? Many of the challenges for transport will be in the urban environment: are there specific measures the EU could take to help local authorities?*

Volvo Group supports the view that long distance transports of cargo, city distribution as well as transports of passengers need to be more integrated into one transport system meeting the different demands.

Urban transport is one of the greatest challenges of major cities due to rapid changes in demography, city structures, behaviour and demand. This will lead to demands for efficient high capacity and environmental friendly transport systems for distribution of goods and people.

If transport flows are to be managed better, we need both better information on these flows and effective management tools. However, only part of the challenge is technological. A much greater challenge is institutional, organizational and financial. Urban transport is a complex system in which intervention in one place can have unforeseen consequences in other aspects. Learning to understand this complexity is a key condition for managing this transformation.

Transport of people and goods in urban environments must be treated from a holistic perspective taking into account the complex interaction of drivers and

processes. Integrated logistic solutions must be developed that coordinate goods transport in city environment. Solutions that integrate long and/or regional distance transport with local transport systems that allow easy transferring of goods from long distance vehicles to efficient distribution vehicles should be analysed and developed.

European safety agencies exist for aviation (EASA), maritime (EMSA) and rail transport (ERA). The development of a safe and efficient European road traffic system is one of the EU's major priorities and there is a lack of a common body to facilitate the work.

As a first step a small but highly competent "Road Safety Institute" for analyses and policy recommendations should be formed.

Integrated transport solutions could be viewed in 3 dimensions;

- 1 - Driver support/aid systems to quickly reduce fuel consumption.
 - Driveline development such as hybridization, renewable fuels and more efficient and longer vehicle combinations.
 - Elimination of bottlenecks and a systematic approach to planning infrastructure and city planning
 - Intelligent and standardized IT infrastructure that enhances the efficiency of freight and passenger traffic.
 - Standardized legislation, systems and solutions.
 - Institutional coordination to enhance R&D focus and large scale field operation tests.
 2. Europe needs all modes of transportation well-integrated and complementing each other to ensure efficient transport routes. Totally integrated transport solutions (often referred to as co-modal) wherein different modes of transport operate jointly, are crucial to a sustainable development.
 3. Green corridors and Green City Lanes with separated lanes in the cities for buses and whenever possible also combined with goods transportation.
- ⇒ The EU should in the revised White Paper take a holistic view promoting "Integrated transport solutions" in all dimensions.

- ***Cooperative urban transport of goods and people – Green city lanes***

The challenge in meeting demand for mobility of people and goods in cities is related to the slow change in land use, the reallocation of road space and the need for increased transport network efficiency and reduced cost while respecting environmental concerns.

The introduction of “collaborative urban transport solutions” will maximize the utilization of the infrastructures, load carriers and vehicles both for goods and passengers. Active and early cooperation between all stakeholders (society, transport customers, operators and transport system) is required and can be stimulated by the EU. The collaborative urban transport solutions should consist of:

- The “green city lane” is a shared infrastructure (i.e. dedicated lanes, bus rapid transit, bus stops and delivery zones) used to distribute goods and transport passengers in the cities. Trucks and vans are able to access the infrastructure between passenger traffic peaks when fulfilling predefined criteria's (such as for example load factor and emission levels including noise). Access is controlled and regulated by the city authorities in real time using latest information and communication technologies.
- The “city micro-terminal” (i.e. urban consolidation centre) is located nearby or in the city centre and accessed through the green city lane. Flexible opening hours allow regular freight deliveries even during night. Last kilometre deliveries in critical city area, is ensured by electrical vehicles (i.e. light or medium duty vehicles). In some cases micro-terminals could also include waste consolidation (i.e. waste compacting) and be connected to the passenger terminals, thus covering the complete urban transport metabolism (i.e. goods and passengers transport flow in/out the city). Micro-terminals are equipped with latest information and communication technologies to ensure just-in-time availability for goods distribution trucks.
- The “city commercial vehicle” is;
 - clean, safe and efficient
 - multi-purpose and modular to allow optimization for the transport mission (i.e. volume and weight, type of goods, load carrier, etc).
 - energy flexible (i.e. diesel, gas, hybrid electric or full electric) to allow adaptation to specific city requirements.
 - safe and in the future semi-automatic.
 - flexible; allow adaptation to specific city requirements, i.e. night deliveries
 - convertible passenger/goods transport, e.g. load more than 10 delivery persons, 10 electrical lifts and 20 city containers.

- **Bus systems**

EU should strongly promote a holistic view point on city bus traffic systems including Green City Lanes, described above. Sets of rules that facilitate public procurement of city bus traffic systems need to be developed on an EU level. Today city planning and public procurement is favouring rail as rail is procured as a system. Buses are often reduced to a simple procurement by piece and not a part of a transport system.

It is proven that a modern city bus traffic systems with dedicated lanes, effective ticketing, etc is more energy and cost effective than rail bound systems. Pilot installations of bus transport systems, performed with the same system thinking that characterizes investment and re-investment in rail bound transport, should be promoted by the EU.

The Volvo Group do not only manufacture buses but also develops efficient bus systems for large cities such as the “Bus Rapid Transit” (BRT) which is similar to an above-ground subway/streetcar system operated by buses. A BRT system has the same features as a track-bound system with regards to passenger capacity and average speed. It is achieved with dedicated bus lanes, longer distances between stops, buses with high capacity (150-270 passengers), signal systems that prioritize the bus traffic, rapid payment systems (payment at the bus stop or Smart Cards) as well as effective passenger information.

The major advantages with BRT are improved environment through reduced emissions, large passenger capacity and substantially lower cost than for a track-bound system both in infrastructure investment and vehicles. The system can be implemented in a very short time and operated without any subsidies – financed solely by ticket sales. EU has an important role in implementing processes and rules for public procurement and deployment of standardized systems.

*(7) **The external dimension.** The transport sector is increasingly becoming more international. Which actions in the transport sector can help to foster relations with our neighbouring countries and encourage sustainable growth there? What measures can help the EU industry and transport operators to thrive in the international context? How can the Union better contribute to sustainable global governance?*

The weight & dimension regulation should be more global and harmonized with regulated load length by which the total vehicle length is not the most important. With harmonized regulations the transport and logistic solutions will be more flexible, efficient and global. Focus shall be given to criteria's for Sustainable transport (emissions, road wear, traction and safety).

On an EU level regulations for the use of the heavy commercial vehicles; e.g. road taxation, environmental zones, transport/vehicle combinations etc

Harmonized regulations and/or mutual acceptance are needed on a global level for:

- testing methods
- certification
- routines for conformity of production

To finalize: The EU has a very important role to play to establish a new transport policy that will contribute to the competitiveness of EU by removing barriers to the use of different modes of transport in different combinations. EU management is needed in all these fields by developing common platforms for standardized solutions for integrated European transport models, common European road safety rules and emissions targets.

The Volvo Group would appreciate to participate in further discussions, if we can in any way contribute to the work ahead.