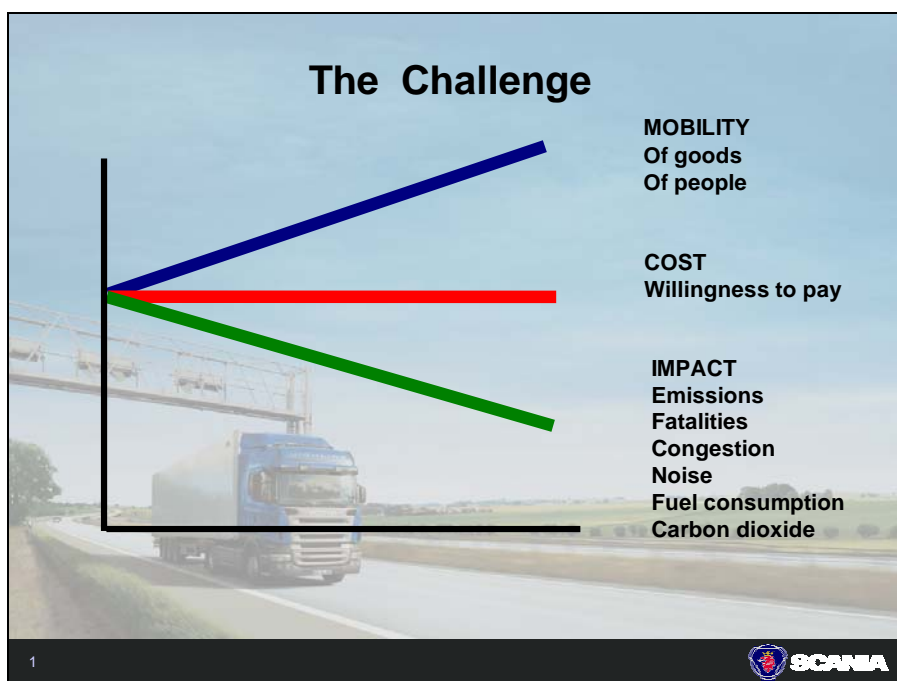


Consultation on the Communication on a Sustainable Future for Transport

The 2001 Commission White Paper on Transport policy set the transport policy agenda up to 2010. With the end of the ten-year period approaching, the European Commission has initiated the debate on the future of the EU transport policy, with a view to publish a new Transport White Paper in 2010.

The Communication on the Future of Transport, published on 17 June 2009, is an integral part of the debate and proposes a vision for the next decade. It develops ideas based on six trends identified as the drivers of transport, namely: an ageing population; migration and internal mobility needs; greenhouse gas generation and pollutants emissions; the increasing scarcity of fossil fuels; urbanisation; and globalisation. Solutions proposed include increased integration between different modes of transport, introduction and deployment of innovative technologies, with the goal of achieving a transport system that is integrated and sustainable, safe, accessible and efficient.

Scania welcomes the Communication and intends to continue to be a constructive partner of the European Institutions in the debate, by providing its technical expertise. This paper intends to state a few general principles that Scania supports regarding the future of transport policy in the EU.



Performance based vehicle standards

At Scania we are continuously working to decrease the environmental impact of our products and improve efficiency in the transport business. Scania's strategy aims at tackling the impacts of its vehicles not only through engine improvements, but also through investment in driver training, on-board driver support systems, aerodynamics, low rolling resistance of tyres and hybrid systems.

In order to achieve its goals, we believe that the industry needs the setting of performance-based, rather than technology-based, standards. We believe that performance goals stimulate innovation in the industry, rather than picking winning technologies and hamper new developments. Vehicle standards should be global whenever possible and completely interoperable in Europe and beyond, in order to avoid fragmentation of the market. Sufficient lead time should always be considered to enable the industry to comply.

Fuel consumption and CO₂ generation

Declarations or standards regarding fuel consumption and CO₂ generation for heavy commercial vehicles should be based on the "work done principle", that is fuel consumption and CO₂ generation in grams per tonne-kilometre of goods or per passenger-kilometre for buses and coaches.

In this context, Scania considers useful to bear in mind the inherent physical conflict that exists between fuel consumption and CO₂ generation and the emissions of NO_x and particulates. Engine technologies that reduce emissions of NO_x might lead to higher fuel consumption. Exhaust particle filters also increases fuel consumption.

Efficiency of transport and logistics

Improved logistics and increased efficiency in transport feature regularly in any debate regarding the future of transport and sustainable mobility.

One of the main issues debated is that of longer and heavier vehicles, the European Modular System (EMS). The EMS is probably the simplest solution to increase the road transport capacity in an environmentally sound manner, thanks to the flexibility it allows and to the use of existing standardised loading units that can facilitate the development of intermodal logistics operations. However, the debate is highly sensitive, with the opponents of EMS citing negative consequences for the environment and for road safety. We understand the issue's political sensitivity in some member states and believe that each member state has to reach its own conclusions. However, we do encourage all member states to carry out tests and are happy to support with our technical expertise.

Scania is also in favour of market liberalisation in Europe and welcomes moves to lift all restrictions to cabotage. Maintaining limits hampers efficiency with

negative consequences on fuel consumption, CO₂ generation and the emissions of pollutants. More efficient logistics, investment in infrastructure and the creation of a well maintained network of trans-European roads can greatly contribute to tackling environmental and capacity issues. Scania welcomes calls to adopt an integrated approach to tackle the challenges of the transport sector and improve the efficiency of logistics. However, Scania believes that the concept of modal shift should be fully replaced by one of co-modality as one mode of transport should not hamper the development of other modes.

ITS Action Plan and Directive

The European Commission published an Action Plan and a proposal for a framework Directive on Intelligent Transport Systems (ITS) in December 2008. The ITS Action Plan outlines priority areas to accelerate the deployment and use of ITS applications and services across the EU in a coordinated fashion across member states. The Directive provides a framework for the implementation of these actions. The ITS Action Plan and Directive enjoy great political support and the usefulness of ITS systems is generally accepted.

Scania is in general in favour of actions that ensure interoperability across the EU, and welcomes initiatives to deploy ITS systems, as long as the issues of liability, data protection and users' costs are satisfactorily addressed. However, Scania questions whether artificially creating one single policy area for ITS is the appropriate instrument to encourage and support deployment.

Transparent and interoperable road pricing¹

The Eurovignette III proposal aims to enable EU member states to integrate costs, such as noise, pollution and congestion into toll prices, based on a common methodology for the calculation and internalisation of external costs. Negotiations in Council failed to find an agreement and the dossier has now been put on hold, while the Commission carries out further impact studies. The Swedish Presidency will not treat this dossier as a priority, meaning that work will resume only under the Spanish Presidency (first half 2010) or even under the Belgian Presidency (second half 2010), given the negative stance of Spain on the proposal.

Scania is convinced that in order for the Eurovignette system to be efficient and effective, it must be interoperable, transparent and the revenues be reinvested in the development of European road infrastructure. There also should not be a double charging of externalities.

¹ A transparent road pricing scheme should be devised in a way that enables the road user to take proper action - e.g. by replacing his vehicle - in order to decrease fees for emissions, noise and other vehicle related externalities.

Road safety

In 2001 the European Commission launched European Road Safety Action Plan where it agreed on the goal of halving the number of road deaths by 2010. Today it is clear that this goal will by far not be reached. The European Commission has launched a public consultation on road safety and driver training, with traffic safety education as its focus. Following that, the European Commission is expected to present its Road Safety Action Programme in 2010.

Scania takes pride in constantly improving the safety and comfort of its products for the sake of the drivers, our customers. We believe that legislated vehicle safety features should be based on sound cost-benefit analysis. However, Scania also considers that an integrated approach should be adopted which focuses on safer infrastructure and appropriate drivers' training, as well as proper implementation of road safety rules, such as the driving time legislation.