



The Eurocouncil of the Fédération Internationale de l'Automobile  
European Bureau

**FIA Eurocouncil answer to public consultation on the Communication COM(2009)  
279/4 on “A sustainable future for transport: Towards an integrated, technology-  
led and user friendly system”**

The Eurocouncil of the Fédération Internationale de l'Automobile (FIA), Europe's leading mobility organisation, represents via its 71 national clubs in 47 European countries 34 million European motorists. Europe's motoring and touring organisations have as their highest priority to put their members' interests at the centre of Europe's policy in making mobility more sustainable, i.e. more comfortable and reliable, better integrated, cleaner, more efficient and safer while keeping it affordable for all.

The motoring and touring clubs in Europe draw on a great depth of experience and knowledge gained as a result of dealing daily with the mobility concerns of their members. This extensive know-how and expertise is used to tackle new mobility challenges as they arise. They are involved in a wide range of technical and educational development programmes, product and infrastructure testing, field research, the operation of a technical testing laboratory as well as driver training centres. Thanks to this they operate at the cutting edge where innovative solutions can be found for the benefit of consumers.

The clubs long experience means that they have the knowledge of how to best address mobility challenges all over Europe. The traditional focus of the clubs is on road safety. A more recent field of activity covers traffic management, with road patrols helping to speed up the process of incident clearance, and traffic information services giving congestion warnings to help motorists find an alternative route in time. The motoring and touring clubs are involved in technical development projects, participate in a variety of expert groups and promote innovative solutions by taking part in pilot projects. The clubs focus on their role in consumer protection, testing traffic management systems, public transport systems, park-and-ride facilities or cycling-friendly infrastructure. It is the close contact to road users and local, regional and national authorities that ensures practical, financially viable and user-oriented solutions.

As the voice of Europe's motoring consumers the Eurocouncil of the FIA believes that European transport policy should be solid, reality-tested and long-term oriented in order to successfully tackle present and future challenges. In response to the challenges outlined in the Communication the present answer to the consultation aims at providing ideas on how to translate the general objectives and priorities into concrete policy measures.

The issues addressed by the European Commission in its public consultation guide document are answered where most appropriate in the twelve chapters below. The questions are quoted in text boxes containing the reference number of the policy field identified by the Commission.



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*Policy field (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?*

1) Preliminary remarks

Mobility is an important enabler of social, economic and environmental welfare and not a playing field for ideological battles. The proper functioning of the EU's transport system is essential to its competitiveness and the quality of life of its citizens. It enables the production process to run smoothly and is an indispensable condition for economic growth. Citizens should benefit from a transport system whose design and management corresponds to their needs, taking into account social, economic and environmental aspects in a balanced way.

Especially with regard to the objectives of the Lisbon agenda, European transport policy has to fully support the needs of Europe's citizens in terms of mobility. Every mode of transport has advantages and disadvantages. They need to be recognised and used to the benefit of European citizens. A policy that does not take into account the real needs is bound to fail, implying tremendous costs to society. A transport system guided by ideological principles jeopardises the welfare of all.

European policy has in the past often failed to take account of the vital and central role of road transport in the European economy and society. Road transport contributes to social integration by reducing the geographical handicap of peripheral countries and regions and bringing EU citizens closer together. 90% of passengers and 80% of inland freight transport in the EU is carried on roads. The passenger car is the premier mode of transport for the vast majority of European citizens. It is unmatched for independent mobility and convenience and its benefit to society will continue to grow as the balance between social costs and benefits becomes increasingly positive.

Individual and collective transport offer different services and therefore fulfil different needs. They are not, as is often assumed, communicating vessels. Statistical evidence showing a large predominance of individual transport means with almost nine motorised journeys out of ten made by individual transport in the EU, compared to around one in ten by public transport, pinpoints to the fact that the individual transport is the area where most of the work needs to be done. The efforts need therefore to be focussed on enhancing the sustainability of individual transport. Public transport plays without any doubt a crucial supportive role which can be enhanced if its service is further adapted to the needs of its users (comfort, flexibility, modal integration, etc.). A forced modal shift policy based on traffic restrictions and increased costs for individual transport lead to loss of welfare without the expected benefits for mobility and quality of life.

As a matter of fact, Europeans live longer and healthier lives, bringing about a number of challenges and opportunities. These changes lead to a significant increase in older citizens, who enjoyed the benefits of daily mobility all of their adult lives and who want to continue leading an active and socially integrated life in their old age. The European Union should take their needs into account when developing transport policy, not only to the benefit of the elderly, but to the benefit of all, so allow older citizens to fully participate in tomorrow's society.



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*Proposed action*

In the White Paper on transport policy to be published in 2010 the European Commission should focus on policies aimed making individual transport, representing 90% of passenger transport, more sustainable, i.e. more comfortable and reliable, better integrated, cleaner, more efficient and safer while keeping it affordable for all. The European Commission should in particular analyse the impact of the ageing population and take their needs into account.

2) Facts and figures

A vital tool to assess transport-related issues is sound facts and good analysis. Quantifying transport performance should be an important step when highlighting a problem, assessing its extent and defining the need for action. Developing policies without usable definitions or numerical and statistical foundations is like developing economic policy without sound GDP figures, interest rates or price indices.

*Proposed action*

In order to provide better factual information about transport and mobility the European Union should further develop harmonised statistical definitions. Where needed targeted research could address (1) data collection and demand analysis, (2) sustainable strategies, traffic planning & management and land use, (3) transport supply as well as integrated and harmonised systems and services and (4) user aspects: safety, security, comfort, accessibility. Based on the analysis of existing research results the European Union should develop sustainable mobility indicators and identify the research still to be addressed in the Mobility Strategic Research Agenda.

<i>Policy field (1) Infrastructure. What should be the priorities for investment?</i>
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3) Infrastructure development

A good transport infrastructure is a condition for sustainable mobility in ensuring smooth traffic flow and giving a high level of safety. Studies underline the strong positive relationship between investment into transport infrastructure and GDP growth<sup>1</sup>. This is particularly true for the access to main gateway infrastructures such as sea ports. While almost nine out of ten transport journeys are done on the road the European Union policy failed to appropriately support road infrastructure maintenance and development (e.g. TEN-T investment), new information technologies and efficient integrated public transport taking into account economic, social and environmental needs, while promoting inefficient and costly alternatives.

*Proposed action*

An important field of action in European transport policy is the financial support given to priority transport infrastructure axes, completing the Trans-European Transport Network (TEN-T). Given the key role played by the road in Europe's modern transport system a respective share of the financial investment should in future be allocated to it. Maintaining and completing the road TEN-T will reduce the amount of traffic congestion in Europe and so bring a contribution to less pollution and less fuel consumption as well as improve road safety by resolving some of the road network's black spots. This investment will contribute to make mobility more sustainable.

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<sup>1</sup> The Eddington Transport Study: Transport's role in sustaining the UK's productivity and competitiveness, December 2006.



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*Policy field (1) Infrastructure. What can the EU do to promote the integration of modal networks as well as their maintenance and upgrade? Which measures would allow a better exploitation of the networks and a balanced use of the different modes? Policy field (4) Legislative framework. In which sectors should market opening be pushed forward and how?*

#### 4) Co-modality

Public transport offers in many places a poor service that does not present an alternative to individual transport. Public transport therefore still needs to become a lot more efficient and better integrated in order to offer a competitive transport service to the mobile consumer. The efforts of the European Union to open-up the public transport markets with view to increase the quality of the offered services have had a limited success. As a consequence public transport remains often little efficient and offers poor services to consumers. Public transport would however be attractive if it could offer a partly equivalent and effective alternative to the individual transport. Moreover, a better inter-modal integration would give public transport a significant competitive advantage (e.g. park-and-ride, bike-and-ride, car hire and car sharing). It is especially important in urban areas, where public transport plays an important role as an alternative to the private car. Car pooling, car sharing and (company) mobility management can also make daily mobility more efficient. Walking and cycling can be real alternatives to motorised transport for short distances if the environment allow an easy, safe and secure trip. Barrier-less road environment for the mobility impaired people, bicycle hire points, bike-and-ride systems and anti-theft bicycle sheds, cycling safe road infrastructure as well as bicycle access to public transport are some examples of good practices.

#### *Proposed action*

Based on their experience working in the field of mobility management the motoring and touring clubs have analysed the mobility patterns following the mobile consumers' needs as well the actual offer. Through specific projects they have developed qualitative criteria, tested transport offers and highlighted best practices. The European Union should in the framework of co-funded projects further promote such activities. The European Union should on the other hand pursue its efforts to open-up the markets for public transport services and make sure that the respective European legislation is applied in all Member States.

*Policy field (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?*

#### 5) Passenger rights

The FIA Eurocouncil welcomes the willingness of the European Commission to improve the existing EU policy on passengers' rights, originally developed for air transport. This policy will have to be adapted to the specificity of each other transport mode and have to take into account the size of the enterprises operating in the sectors concerned. The implementation of the legislation ultimately lies in the Member States.

#### *Proposed action*

The European Commission should provide passengers of busses and ferries with precise applicable policy principles in the future EU policy, taking into account the specificities of enterprises operating in these sectors. Besides, more should be done to ensure that consumers' rights are effectively respected, without having to go through a long judicial procedure. As



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cross-border mobility is a key requirement for an effective internal market, closer attention should be paid to ensure that the legislation also encompasses inter-European travels. Beside rail and aviation, our own consumer testing programmes (bus test, ferry test) indicate that similar initiatives in other fields would be beneficial.

*Policy field (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?*

#### 6) External costs

The approach chosen by the European Commission to internalise external costs through charges contradicts the goals fixed by the Lisbon Agenda by unnecessarily burdening the European economies. A proper assessment of the so-called external costs is outstanding. The study on which the Commission bases its policy proposals is merely a compilation of research results without proper and critical assessment. Moreover, an internalisation without a cost-benefit analysis is a non-sense. External benefits, such as social inclusion and economic prosperity, have not been considered. In fact, taxes and charges paid by motorists cover all of their environmental and social costs.

##### *Proposed action*

The European Commission acknowledged in its Communication on a sustainable future for transport (art. 71 and 73) that transport energy taxes by themselves roughly cover the sector's most common external costs. Following this conclusion the Commission should focus its efforts on reducing the nuisances and not for trying to charge for them. Cleaner vehicle technologies and efficient transport infrastructures should be promoted through legislation where most appropriate and through encouraging Member States to upgrade their transport networks.

*Policy field (4) Legislative framework. What measures of a regulatory nature should be considered to reduce the transport sector's environmental impact?*

#### 7) Environment

Cars have ever become cleaner and more fuel efficient. Toxic emissions from road transport have significantly decreased in recent years following the technological development of vehicles and fuels (CO, SO<sub>2</sub>, NO<sub>x</sub>, Pb, PM). However further improvements are still necessary and new Euro norms will enter into force within the coming years (e.g. Euro 6). With regard to greenhouse gases the CO<sub>2</sub> emissions from cars have remained stable over the last 10 years, despite a significant growth in traffic. The legislation limiting CO<sub>2</sub> emissions from cars and vans will contribute to further significant efficiency gains. Further effective incentives include targeted motoring taxes, a harmonised CO<sub>2</sub>-labelling scheme and a large scale promotion of fuel efficient driving information and training.

##### *Proposed action*

The European Union should further promote the development of alternative propulsion systems and fuels as well as fuel efficient driving, for instance through including efficiency aspects into initial driver training, promoting advanced driver training and co-funding European projects addressing eco-driving. The European Commission should furthermore pursue its efforts to implement a harmonised approach to an environment friendly technology neutral taxation.



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*Policy field (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?*

#### 8) Intelligent transport systems

ICT-based transport applications can help increasing the efficiency of transport and the use of limited infrastructure, so reducing congestion and improving transport safety and security. A large number of ICT-based transport applications have been successfully developed and demonstrated in collaborative research projects throughout Europe. Today, there is a growing need to deploy them on a large scale while making sure that user needs are taken into account, that field tests confirm the proper functioning and that liability issues are addressed.

##### *Proposed action*

The European Commission should set a framework for the deployment of the most market-ripe and affordable technologies. Motorists should be convinced of the utility of the systems and better informed on their use. Tax incentives should be put in place to help speeding up their penetration. Proposals made in the ITS Action Plan published in 2008 should be pursued.

#### 9) Testing, benchmarking and consumer campaigns

European FIA member clubs have been testing and benchmarking mobility infrastructure for several years, both at national and European level. The aim of EuroTest is to test the quality and safety of mobility in Europe (e.g. railway stations, pedestrian crossings, park-and-ride) while EuroRAP<sup>2</sup> and EuroTAP<sup>3</sup> specifically benchmark open roads and road tunnels. National test included bus and ferry tests. In a similar way, the EcoTest programme helps consumers to choose environmentally friendly cars by measuring their emissions and published rating results. Based on the experience gained in past years we believe that testing and benchmarking contributes significantly to fostering sustainable mobility. Those programmes provide mobile consumers with tips and recommendations so they can safeguard their own mobility and stimulate public debate about identified failings and if necessary call for regulations.

##### *Proposed action*

The European Commission should set consumer information and awareness activities as one of its key actions in its strategy to foster sustainable mobility. Consumer testing and benchmarking programmes such as EuroRAP, EuroTest and EuroTAP should be promoted by the European Union to play an important role in informing consumers and fostering a sustainable mobility.

#### 10) Road safety

Road safety needs strong leadership, commitment, clear objectives and precise, ambitious while achievable targets. Today's challenge is to create a system that minimizes errors and absorbs human mistakes in critical situations and crashes. To be most efficient any road safety policy must address vehicles, drivers and roads within a safe systems approach. Road safety is a responsibility of all stakeholders including users, vehicle manufacturers, road infrastructure owners and governments.

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<sup>2</sup> European Road Assessment Programme (<http://www.eurorap.org>).

<sup>3</sup> European Tunnel Assessment Programme (<http://www.eurotap.eu>).





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*Proposed action*

The European Union has to play a key role in this field by setting ambitious targets in its fourth Road Safety Action Programme, launching new initiatives, foreseen further legislation where appropriate and showing a high level of commitment in reaching the set targets. In general, a particular focus should be put on vulnerable road users. With regard to behaviour the awareness and responsibility of all road users need to be further promoted through education and information. An important step in improving driver education should be taken by implementing the second stage of driver training on the European level as some Member States have already successfully implemented it. Campaigns should encourage safe driving practices and programmes should insure life-long learning, targeting especially high risk groups. New E-learning and simulation technologies should be encouraged as a supplementary means of training new drivers, to undertake assessments of those most at risk and to maintain and update the knowledge and skills of more experienced drivers. As to improving the road environment, the Directive on Road Infrastructure Safety Management should be implemented without any further delay. The European Union should condition TEN-T funding to the delivery of safe infrastructure and to the provision of road related risk information according to the concept of the "freedom of information act"<sup>4</sup>. Each European Council should in this regard set road safety on its agenda and monitor progress very closely.

*Policy field (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?*

12) Urban mobility

The issue of mobility of people and goods in urban areas is often narrowed down to difficulties and loss of quality of life. Air pollution and noise problems in urban areas are finding more and more awareness in the media and the public opinion. Political leaders feel increasingly compelled to take short term drastic measures. As a result, rather than integrating mobility into the equation of a successful city management, policy makers choose to single out transport as the cause of the problem and believe to solve it through bans and restrictions. Bad mobile management and deficient urban planning can however not be sweetened by a ban or a charge. A more sustainable strategy to address the causes of the problem would need to look at the structure of cities as a whole and at the individual needs of its citizens.

*Proposed action*

The burden put on cities by the mobility of goods and people should be alleviated through better planning and infrastructural measures, not through traffic restrictions or additional charges. These are however regional and local competences. The European Union should however leave this matter to the Member States so respecting the principle of subsidiarity.

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<sup>4</sup> Research clearly shows that the potential for reducing death and serious injury is significantly increased when a road is “self explanatory” and “forgiving”. See also chapter about infrastructure development.